



The Consumer Voice in Europe

IMPROVING FISH LABELLING: CONSUMERS NO LONGER WANT TO FISH FOR INFORMATION

BEUC position on European Commission proposal for a Regulation on the common organisation of the markets (CMO) in fishery and aquaculture products

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Summary

Consumers should have access to clear, honest and comprehensive information about the food they buy. When it comes to fish, the (accurate) commercial name of the species, the production method and the precise origin are essential information that should always be provided, whether the fish is sold fresh, frozen, tinned or prepared. For “fresh” fish, consumers should know whether the fish has been defrosted and the date of catch should be given as it is important information to those wishing to support small scale fisheries. Finally, whilst avoiding their proliferation, there is a need to guarantee that “sustainable” fish labels can be trusted by consumers looking for fish that has been sourced from healthy stocks and using techniques that do not damage the marine life.

Fish is a healthy and nutritious part of Europeans' diet and ever more health-conscious consumers are trying to follow advice to eat seafood twice a week. Beyond price and quality (freshness), consumers are increasingly interested in what fish they buy, where and how it was caught or farmed. However, they cannot always find this information on food labels: whilst EU law requires that the commercial name of the species, the means of production and the origin be given for raw and minimally processed fish, this no longer applies when the fish has been prepared or preserved.

BEUC, the European Consumer Organisation, welcomes the introduction of improved and extended provisions for consumer information on fish. Consumers should have access to clear, precise and truthful information on the main characteristics of the fish they buy. In particular, labels should always indicate the accurate commercial name, the precise origin and the production method. Whether or not the fish has been defrosted is also important information to consumers, as is the date of catch for those wishing to support small scale fisheries. It is also imperative that, when it comes to the provision of additional information on a voluntary basis (e.g. relating to sustainable fishing), this should be clear, verifiable and non-misleading.

1. Unambiguous fish names controlled for accuracy

Consumers should be clear about what fish they buy. Labels at retail level should show species *specific* commercial names (e.g. "Skipjack tuna" and not just "tuna") and sufficient controls should be in place to ensure labelling is accurate: cases of mislabelling of fish (whether inadvertent or intentional) have repeatedly been reported^{1,2}, which undermine consumers' confidence in their food.

Indication of the **scientific name** of the species could help make the label even more explicit, hence keep consumers from being cheated on what they are buying (e.g. the (Atlantic) sole (*Solea vulgaris*) has a more delicate flesh than so-called "tropical sole" (*Cynoglossus spp*)).

Also for preserved or prepared products, it should be clear from the label if several varieties of fish have been mixed. This would help avoid that cheaper fish is substituted for more expensive species without consumers being properly informed.

¹ FSAI Fish Labelling Survey of March 2011.

² Poissons de mer: Alerte aux faux filets. Article published in the April 2010 issue (N° 27) of the Swiss consumer organisation FRC's magazine.

2. Easily understandable information on origin, including for preserved/prepared fish

Research, including that conducted by BEUC members^{3,4,5}, shows that **consumers are increasingly interested to know where their food comes from** – especially meat and fish. For instance, 73% of UK consumers believe it important that the origin of fish is labelled and 61% of French consumers systematically or often look at the origin of fish.

Today, indication of the catch or farming area is only required for raw/minimally processed fish: we support the extension of this provision in order that such information is **also provided on prepared and preserved fish** so that consumers wishing to avoid particular fishing areas (e.g. over fears of heavy metals contamination) or wishing to consume locally can do so. Moreover, when consumers are told that e.g. breaded fish was “made in” a given country, they should know if the fish was actually caught elsewhere in the world⁶.

More clarity is also welcome when it comes to expressing the catch area for fish caught at sea as the current FAO areas are too vague⁷. BEUC supports a **precise indication of the fish origin** (spelled out in words).

3. Indication of whether fish is fresh or has been defrosted

The freezing and later defrosting of seafood and seafood products limits their possible further use and may also have an effect on their safety, taste and quality. Therefore consumers should be **informed of whether the product they buy (pre-packed or not) is fresh or has been defrosted**. Regarding the mention “defrosted”, the provisions of Regulation (EU) 1169/2011 on Food Information only apply to pre-packed foods. Therefore, specific provisions are needed in the fish CMO Regulation. There should be no further derogations

³ Which? research from September 2009 <http://www.which.co.uk/about-which/press/press-releases/campaign-press-releases/food-and-health/2010/01/country-of-origin-rules-should-be-expanded-says-which/>

⁴ Verbraucherzentrale, Bundesweite Umfrage “Lebensmittel aus aller Welt – Kennzeichnung lückenhaft und missverständlich”, Eine Gemeinschaftsaktion der Verbraucherzentralen, Juli 2007, at http://www.vzbv.de/mediapics/bericht_umfrage_herkunft_von_lebensmitteln_23.07.2007_copy.pdf

⁵ IFOP (June 2010). Research conducted in December 2009 and May 2010. Results available at http://www.ifop.com/?option=com_publication&type=poll&id=1179

⁶ CLCV (Confédération de la Consommation, du Logement et du Cadre de Vie) <http://www.lepointurlatable.fr/le-blog-de-celia/les-pieds-dans-le-plat-croustibat-100-made-in-france.html>

⁷ CAI (Consumers' Association of Ireland). Fishy business in Consumer Choice, June 2010 (pp. 176-178).

than the limited ones foreseen in Regulation (EU) 404/2011 (i.e. fish previously frozen for health safety purposes or before further processing operations).

4. Date of catch vs. date of landing

Many consumers are **interested in the date when a fresh fish was caught** (e.g. to know whether the fish was caught by a trawler that has been at sea for several days/weeks or rather by a smaller off-coast vessel whose catch has just been landed). On the contrary, the date of landing would not provide them with meaningful information as fish caught several days ago could end up with the same landing date as fish caught only one day ago. Education campaigns - e.g. to inform consumers that some fish species may enjoy a better taste from maturing - could further empower consumers to make a fully informed choice as to which "quality" (freshness) of fish to purchase.

5. More precise information on production methods

As of today, indication of the production method is only mandatory for raw and minimally processed fish. BEUC welcomes the extension of this requirement to prepared and preserved fish even though the information that must be provided to consumers is rather limited (i.e. whether the fish was caught at sea, in freshwater or was farmed). **More detailed information on the production technique** (e.g. trawl, long-line or pole-and-line fishing, fish pond or open water aquaculture) could help consumers so wishing to make more sustainable choices even in the absence of a "sustainable" label. This factual information could be complemented by a rating system allowing consumers to easily evaluate and rank their impact on the environment and marine life.

6. Preventing bogus sustainable fish labels

Many consumers want to buy fish that has been sustainably sourced but the multiplication of industry own claims and independent certification schemes makes it difficult for them to know what to buy. A **transparent and harmonised set of minimum criteria** should be in place to ensure that only genuine sustainable fish labels can remain on the market. An **EU-wide ecolabel** for fish may also be worth considering provided the underpinning criteria are strict and regularly updated in order to promote ever more sustainable practices.

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