Caviar Labelling, a global issue

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Caviar historical background

Historically:

- More than 90% of caviar came from Black and Caspian Seas
- Because of overfishing, international trade of caviar fell under CITES in 1998
- Quotas not respected → ban on exports of « Wild » sturgeon in 2008

Data: WSCS
Caviar labelling, the issue

Facts list:

• EU is the bigger market for caviar
• Only CITES code as mandatory mentions on label of cans
• Extremely hard to read (or understand for casual buyers)
• The majority of the caviar produced outside the EU is not sold under the primary producer brand but is repacked in European facilities under an other name (which is called repacking)
• Big loss of information (and misunderstandings)

Why?
Caviar labelling, the issue

Not repacked caviar label:

Species code  Country of origin  Processing plant identification number
↓  ↓  ↓
HUS / C / CN / 2017 / xxxxx / yyyy

Source (wild or cultivated)  Year of harvest  Lot identification number

Repacked caviar label (same product):

Repacking plant identification number with country ID code
↓
HUS / C / CN / 2018 / FR-xxxxx / yyyy

Year of repacking  Lot identification number (or export or re-export certificate number)
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Results:
• No more information about the year of production and the plant of origin (only the country, if you are able to read the code!)
• European consumers don’t know what they buy!

But, CMO (EU 1379/2013) in its precepts clearly states:
“In order to enable consumers to make informed choices, it is necessary for them to be provided with clear and comprehensive information on, inter alia, the origin and the method of production of the products”
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CMO, what does it exactly say?

Art. 35 (mandatory information):

(a) the *commercial designation* of the species and its *scientific name*;

(b) the production method, in particular by the following words "... caught ..." or "... caught in freshwater ..." or "... *farmed* ...";

(c) the *area where the product was* caught or *farmed*, and the category of fishing gear used in capture of fisheries

In application for products listed in Annex 1 (a, b, c e) BUT not for products listed in Annex 1 (h):

“Prepared or preserved fish; *caviar* and caviar substitutes prepared from fish eggs”
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What is exactly caviar?

• According to CMO Annex 1: Prepared or preserved fish

  So, it means that it has been processed:

  ‘processing’ means any action that **substantially alters** the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes (852/2004)

  **Is it the case? Absolutely not!**

• According to us: pre-packaged, salted aquaculture product

  And so falls under Annex I (b) **Fish, dried, salted** or in brine; smoked fish, whether or not cooked before or during the smoking process; flours, meals and pellets of fish, fit for human consumption
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Why?

Prepared or preserved fish (Annex 1 h) → CMO Art 35, only CITES labelling

Fish, dried, salted or in brine (Annex 1 b) → Art 35, full labelling!
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What does it imply?

• Move “1604.31 Caviar” from CMO Annex 1 (h) to Annex 1 (b)
  → Caviar should follow art. 35 and label should clearly state the origin of the product!
• Or creation of a Common Marketing Standard on Caviar Labelling
• FEAP also ask for the 2 dates (production and repacking) clearly appear on the cans.

To be clear FEAP:

• doesn’t want to make an exception for caviar but wants fresh caviar considered as it is, not prepared or preserved fish
• doesn’t want to stop extra-EU imports
• doesn’t say imported caviar is of lower quality
• wants European repackers stop making consumers believe that what they sell comes from Europe or Caspian Sea!
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Where are we now?

• **AAC** (Aquaculture Advisory Council)

  - [Checkmark]

• **MAC** (Market Advisory Council)
  
  - Still under discussion with support of the majority

• Bilateral meeting with the European Commission (DG MARE)
  
  - Planned
UN’s Sustainable Development Goals

1) No Poverty
2) Zero Hunger
3) Good Health and Well-being
4) Quality Education
5) Gender Equality
6) Clean Water and Sanitation
7) Affordable and Clean Energy
8) Decent Work and Economic Growth
9) Industry, Innovation, and Infrastructure
10) Reducing Inequality
11) Sustainable Cities and Communities
12) Responsible Consumption and Production
13) Climate Action
14) Life Below Water
15) Life On Land
16) Peace, Justice, and Strong Institutions
17) Partnership
Thank you for your attention