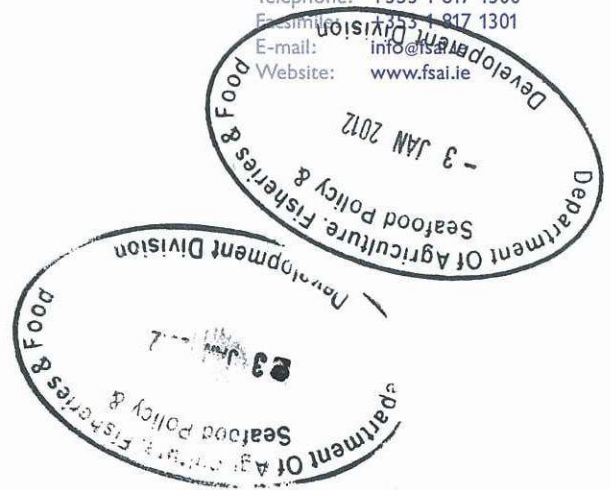


19th December 2011.

Roni Hawe
CFP Consultation
Seafood Policy and Development Division
Dept. of Agriculture, Food and the Marine
Clonakilty
Co. Cork.



Dear Roni,

Re:- Consultation on reform of the EU Common Fisheries Policy

Further to the letter sent to the Chair of the Food Safety Authority of Ireland, Mr Eamonn Ryan, from the Minister for Agriculture, Food and the Marine, concerning the European Union Common Fisheries Policy, the matter has been passed to me for a response.

The Food Safety Authority of Ireland's remit extends, in the context of food safety, to encompass matters relating to consumers' interests, and specifically to promote standards that safeguard these interests. The Authority is also involved in nutrition and provides advice to Ministers on the nutritional aspects of food and the role of diet in public health. Finally, a significant portion of the Authority's food safety remit is delivered through Service Contracts, two of which are in place in the seafood sector, with the Sea-Fisheries Protection Authority and the Marine Institute.

The Authority would welcome any proposals that improve the labelling and traceability of fish marketed in Ireland and the European Union, whether wild caught or from aquaculture. The proposals in the European Commission's Green Paper ('Reform of the Common Fisheries Policy') under the heading 'Trade and markets – from catch to consumer' lack detail, but appear to envisage measures being put in place to encourage producers' to consolidate and better organise to meet the requirements of the consumer.

The Authority would welcome such a simplification of the supply chain in fish as it should allow for greater transparency of information to be provided to consumers, allowing them to make more informed choices about the food they purchase.

We agree with the idea that imported fisheries products must come from sustainably managed fisheries to ensure a level-playing field on the EU market and in this case we regard the need for clear information and labelling at the point of sale as critically important.

If consumers can make informed decisions about their purchases, and they have the information available to them, there is the potential to encourage them to purchase more fish from properly managed fisheries, thus rewarding the responsible elements of the sector and creating an economic imperative to halt the exploitation of unsustainably managed fisheries.

In order to directly assist consumers and provide them with better quality information, we would recommend that the current legislation applying to the labelling of fresh fish¹ is reformed to remove ambiguities that permit the vague labelling of fish, especially from aquaculture, which can cause confusion over their true origin.

The Authority recognises that fish forms an important part of people's diet and offers advice to eat at least two portions a week including one of oily fish. However, while fish is perceived as a healthy food, consumer reluctance to consume it may be based on a complicated set of motivations, perceptions and cultural factors. What is clear, however, is that for fish to play a greater role in further improving the health status of the population, a ready supply of wholesome products at a reasonable price must be available.

Additionally, for certain groups of consumers assurances must be in place that what they are consuming has been fished or grown sustainably, and they are not supporting an activity that is inherently wasteful. In this regard, the proposals to end 'discards,' require the landing of all fish caught at sea and improve and regionalise management of fisheries, would be welcome.

Certification, we consider, has an important role to play in providing assurances to consumers regarding the origin and quality of the fish they might be considering buying. This is particularly important in relation to fish farmed organically, or wild caught fish marketed on the basis of sustainability. As a matter of principle, we would advise against self-certification and suggest that any system in place should employ independent accredited certification bodies with oversight provided by competent authorities in EU Member States.

¹ Council Regulation (EC) No. 104/2000 on the common organisation of the markets in fishery and aquaculture products and Commission Regulation (EC) No. 2065/2001 laying down detailed rules for the application of Council Regulation (EC) No. 104/2000 as regards informing consumers about fishery and aquaculture products.

Independent certification, while admittedly more expensive, may be considered more reliable by consumers, especially if the system is obviously and closely overseen by competent authorities. It would contribute to consumer confidence in the information they rely on when making purchases of fish.

Finally, through the mechanism of Service Contracts the Authority maintains a mutually beneficial and productive working relationship with the Sea-Fisheries Protection Authority (SFPA). The SFPA is responsible for ensuring that food safety official controls are delivered in respect of sea-food from production up to, but not including, sale to the consumer.

The implementation of any positive reforms in this area while welcome, should not, we would hope, lead to a de-prioritisation of food safety or a shift in resources that undermines consumer safety in the sector.

To conclude, we would like to thank you for the opportunity to contribute in this area and wish the Department every success in developing policy in this area. If there are any queries in relation to the points raised, or if the Authority can in any way further contribute, please do not hesitate to contact us.

Yours sincerely



David Lyons
Contracts Manager.