



EU Fish Processors and Traders Association

Brussels, 9 September 2019
Ref. 2019/121

Subject: Net quantity declaration/Request for clarification

Dear Ms Nikolakopoulou,

In February 2015, AIPCE-CEP had a fruitful exchange of letters with the former Unit E4 of DG SANCO (Nutrition, food composition and Information) Head of Unit, Mr Mathiudakis, with regards to the request for legal clarity on net quantity declaration provisions in Regulation (EU) 1169/2011. [Ref. Ares (2015)538413]

During the previous contact, the Commission Services explained that Regulation (EU) No 1169/2011 introduces a clear provision in relation to the indication of the net weight compared to the previous Directive 2000/13/EC, stating *"Where the food has been glazed, the declared net weight of the food shall be exclusive of the glaze"*.

According to FIC regulation, glazed products must indicate the net weight of the whole product. Despite this clarity, it has been noted that there is still confusion in the market about how to label glazed products, as the wording of Regulation (EU) No. 1169/2011 is not interpreted univocally by all the operators.

Owing to these different interpretations of the EU legislation from companies and national authorities throughout Europe, it is actually possible to encounter two kinds of indication: net weight only or both net and gross weights. This leads to different denotations of the weight on the labels of fishery products, which may lead to market disruptions, as operators would need to use different labelling options, not knowing with certainty the appropriate one for each sale destination.

AIPCE-CEP would highly appreciate it if the Commission services could provide with an opinion on how best to prevent inconsistencies in denotation of the weight on labels of fishery glazed products.

We remain at your disposal for any further clarification and we thank you for your attention.

With kind regards,

Guus Pastoor, AIPCE President

Peter Bamberger, CEP President