

## EU FISHERIES CONTROL COALITION

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## From Net to Plate: Gaps and Benefits in Processed Seafood Traceability in the EU



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The ongoing revision of the EU Fisheries Control Regulation provides an opportunity to finally implement traceability for **all** seafood products in the EU. As the world's top seafood importer, the European Union (EU) has a duty to ensure complete supply chain traceability of the products present in its market.<sup>1</sup> Yet, some Member States want to exclude **processed and preserved products listed under codes CN 1604 and 1605**, which represent one out of every six fish consumed in the EU, from the revised Control Regulation.

However, as this brief shows:

1. **Excluding** processed and preserved products from the revised Control Regulation would **leave significant policy gaps**, undermining the EU's effort to increase sustainability, consumer awareness, and to eliminate illegal fishing. Existing EU regulations **do not** have key traceability indicators for processed and preserved products (Fig. 1).
2. **Including** processed and preserved products in the Control Regulation would **improve consistency and critical traceability indicators (species name, catch location, fishing gear, producer ID) and bring benefits to a range of stakeholders, including processors, governing bodies, fishers and consumers.**

<sup>1</sup> To improve sustainability and consumer knowledge, the EU aims to make 'all lots of fisheries and aquaculture products traceable at all stages of production, processing and distribution, from catching or harvesting to retail stage.' (Article 58 of Regulation (EC) No 1224/2009).

## Where are the policy gaps?

- EU regulations in place do **not** cover processed products on key traceability indicators (species name, catch location, fishing gear, producer ID);
- Species name, catch location, and fishing gear are insufficiently addressed by existing regulations;
- Marketing Standards fail to provide traceability standards for the majority of consumed species;
- IUU regulation performs best in covering traceability indicators, but only applies to imports.

It is therefore clear that current EU regulations hamper adequate traceability and reduce the efficacy of proper management. **The revision of the EU Fisheries Control Regulation presents an opportunity to improve consistency and improve critical traceability indicators.**

[Click here](#) for detailed information on the EU policy evaluation and relevant regulatory text.

Figure 1. Extent to which key policies cover traceability indicators for processed seafood.

■ Limited     ■ Not covered

	Species name	Catch location	Fishing gear	Producer ID
<b>CMO</b>	Not covered	Not covered	Not covered	Not covered
<b>FIC</b>	Not covered	Not covered	Not covered	Not covered
<b>GFL</b>	Not covered	Not covered	Not covered	Not covered
<b>IUU</b>	Limited	Not covered	Not covered	Limited
<b>Marketing Standards*</b>	Not covered	Not covered	Not covered	Not covered

\* Regulation EU No 1379/2013 (CMO), EU No 1169/2011 (FIC), EC No 178/2002 (GFL), EC No 1005/2008 (IUU), and EEC No 2136/89, No 1536/92, EC No 2406/96 (Marketing standards).

## EU policy evaluation

- EU regulations do not cover products such as canned tuna, preserved caviar, and prepared eel (CN 1604-1605 product codes) on key traceability indicators.
- Inconsistencies between labeling and traceability requirements exist across a range of products.
- Traceability requirements differ significantly between the products themselves, as observed with unprocessed and processed, packed and unpacked, wild-caught and aquaculture, imported and EU-produced, etc.
- The Marketing Standards illustrate these discrepancies; while sardine cans are required to display the geographic provenance of the product (i.e., FAO areas), tuna cans are not expected to display any catch location.

## Benefits from tracing processed seafood

Numerous benefits are associated with seafood traceability. **Table 1** illustrates benefits that are specific to preserved and processed products and that are related to the complexity of the supply chain, to instances of mislabelling and fraud, and to contamination issues.

**Table 1. Benefits of improved processed and preserved seafood product traceability.**

Category	Factors	Main beneficiaries
<b>Efficiency &amp; Quality</b>	Improved inventory, reduced storage, and <b>reduced product spoilage costs</b> due to residue monitoring, first-in first-out process support, and clear audit trail.	Supply chain actors
	<b>Decreased processing costs</b> through reduced disruptions in productive processes, reporting, and record-keeping requirements.	Processors
	<b>Improved supply chain management and reduced transaction costs</b> by avoiding misrecognition and inaccurate inputs, more efficient communication, and real-time information e.g., for adding new orders.	Supply chain actors
<b>Market</b>	<b>Improved confidence</b> and retention of customers by building trust in trade relations, strengthening trademarks and their reputation, and eliminating costs of product re-launches.	Processors, Exporters
	<b>Minimized recall risks and customer complaints</b> by enabling fast and accurate identification of recall and complaint product scope, enabling corrective measures based on reliable and complete information, and clarifying liability of recall, thus, reducing organizational and reputational recall risks.	Supply chain actors, Fishers, Governing bodies
<b>Liability</b>	<b>Reduced insurance premiums and claims</b> because proof of origin and transit reduces risks of liability.	Supply chain actors
<b>Staff</b>	<b>Labor cost savings in data and operations</b> by optimizing workflow, and reducing data collection and reporting efforts (e.g. during audits).	Supply chain actors, Governing bodies
<b>Governance</b>	<b>Reduced risks in food safety</b> by identifying and withdrawing affected products and assigning liability.	Supply chain actors, Governing bodies
	<b>Increased protection of public health</b> by reducing the magnitude and possible health impacts of food-borne disease outbreaks.	Governing bodies
	<b>Improved compliance by verifying and validating product properties</b> (e.g., origin, species) to meet regulatory documentation requirements.	Supply chain actors, Governing bodies
	<b>Reduced quality verification costs by making aggregated data available.</b>	Consumers, Auditors





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### About the Coalition

The EU Fisheries Control Coalition — The Environmental Justice Foundation, Oceana, Seas At Risk, The Nature Conservancy and WWF, together with Client Earth, The Fisheries Secretariat, Our Fish and Sciaena — is working to ensure that fisheries management in the EU safeguards ocean health and marine life for generations to come. A robust Control Regulation is essential for sustainable fisheries. It will ensure that fisheries activities are fully documented and will bring transparency to our seafood supply chains.

For more information, please visit <http://www.transparentfisheries.org>

