

EU Fisheries Control System Factsheet

Traceability Requirements for Seafood Products

Importance

Making seafood products traceable from point-of-catch to final point-of-sale is a necessary precondition to combating illegal, unreported and unregulated (IUU) fishing, achieving sustainable fisheries and healthy fish stocks, and safeguarding the livelihoods of fisheries-dependent communities. As the leading market for seafood products in the world, the European Union (EU), which imports over 60% of its seafood from mostly developing countries, has a tremendous responsibility to not only require full chain traceability of the seafood products sold in its market, but also to fully enforce this requirement.

EU food safety regulations and best practices oblige a degree of traceability of food products for health and safety purposes, but they do not provide a comprehensive framework for tracking seafood products to verifiably legal sources. This means having the ability to determine by which exact vessel, registered under which country's fleet registry, and under which country's or regional body's jurisdiction the products were harvested, and therefore the ability to make a judgement on whether the products were caught in compliance with relevant fisheries laws.

The Commission's Proposal

The EU's seafood traceability requirements for fisheries control purposes are currently outlined in Regulation 1224/2009 (the Control Regulation).¹ Traceability requirements for imported seafood products, on the contrary, are embedded in Regulation 1005/2008 (the IUU Regulation) ². The European Commission has proposed amendments to both these Regulations as part of their revision of the EU Fisheries Control System.

The Commission's proposal suggests some positive improvements for seafood traceability, especially for EU-caught products, but there are also a number of shortfalls and gaps, especially for imported seafood products.

1. Positive aspects of the Commission's proposal:

- a) For EU-caught products, the Commission's proposal introduces a unique fishing trip identification number into the EU logbook, and mandates the inclusion of this unique fishing trip identification number in the sales note when the product is first sold, which would allow for greater traceability of the product along the supply chain.
- b) More stringent measures for product tracking. Batches of fish (referred to as 'lots' in the proposal) can only be merged with other batches or split in to smaller quantities, if the traceability

¹ Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy.

² Council Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing.

information of each batch is maintained, passed along the supply chain, and the responsible operator is able to keep track of all traceability information

c) Keeping and transmitting traceability information by electronic methods.

2. Shortfalls in the Commission's proposal:

a) Lack of a clear definition for traceability, which maintains a level of confusion for users on what exactly is meant by traceability from a fisheries control perspective. It should be clearly outlined that traceability requirements in the context of the Control Regulation aim to establish the rules to ensure sufficient information is collected and passed to the various actors along the supply chain, as well as EU fisheries control or customs authorities, to verify the legality of the products.

b) The information required to verify the legality of imported seafood products has several loopholes. For imported seafood products, the collection of traceability information is mandated through the catch certificate as required by Annex II of the IUU Regulation. However the catch certificate does not always require some of the essential information for traceability purposes, such as:

- The exact identification of the fishing vessel (i.e. unique vessel identifier, eg. IMO number), which only needs to be provided if available. This contrast with the requirements for EU vessels, which need to provide the identification whenever a vessel is above 15 meters.
- The fishing method that was used. This contrast with the requirements for seafood products covered by the Common Organisation of the Markets.
- Identification of the exact location where the catch took place, as well as date of the catch.

Another loophole for imported seafood products is linked with the catch certificate where most operators provide the fishing area code developed by the Food and Agriculture Organisation (FAO). In EU waters, these FAO fishing area codes are functional because the areas have been subdivided sufficiently to be able to pinpoint which fishery, and under which country's jurisdiction, the product was caught. The same cannot be necessarily said for other FAO fishing areas around the world, which in some cases cover a vast area of ocean. One example of this is FAO fishing area 71, which covers parts of the waters of Australia, Cambodia, Indonesia, Papua New Guinea, Philippines and Thailand, as well as some pockets of high seas, (ie. an area which is more than 13 times the size of the Mediterranean Sea). While it is ultimately in the competence of the FAO to address these issues, the EU could better regulate how information is provided on the catch certificate in order to prevent ambiguity on the location of the catch.

Recommendations

1. Support Articles 14, 56a, 58 and 64 of the Commission's Proposal, which:

- introduce a unique fishing trip identification number in the EU logbook;
- introduce more stringent measures for product tracking;
- mandate electronic record keeping and electronic transmission of traceability information.

2. Request the introduction of a definition for traceability in Article 4 of the Commission’s Proposal.

Suggested definition: *“Traceability is defined as the systematic ability to access any or all information relating to a food under consideration, throughout its entire life cycle, by means of recorded identifications”*

3. Amend Annex II (i) of the Commission’s Proposal to mandate the inclusion of essential traceability information, including:

- the IMO number of the vessel;
- the fishing method and type of gear used;
- Identification of the exact location where the catch took place, as well as the date of catch.

[Read the full NGO position paper](#)