



From Net to Plate

Gaps and Benefits in Processed Seafood Traceability 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. 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).

The revision of the EU Fisheries Control Regulation (EC) No 1224/2009 provides an opportunity to implement traceability for all seafood products in the EU. Yet, suggestions from some Member States to exclude one out of every six fish consumed in the EU (CN 1604 and 1605) would significantly undermine the EU's effort to increased sustainability, consumer awareness, and to eliminate illegal fishing. Indeed, existing EU regulations fail to cover key traceability indicators for these types of products (Fig. 1).

Where are the policy gaps?

- EU regulations fail to cover processed products on key traceability indicators;
- 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.

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



Figure 1. Extent to which key policies of seafood traceability cover traceability indicators. Full (green), limited (yellow), not covered (red).

* 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 fail to cover products such as canned tuna, preserved caviar, and prepared eel (CN 1604-1605 product codes) on key traceability indicators.
- Inconsistencies between labelling 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.

With such issues present, 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.**

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

