# What requirements must fish and seafood comply with to be allowed on the European market?

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As an exporter of fish and seafood to the European market, you must be aware that the requirements for these products are becoming more stringent. The increasing number of requirements is a reaction from the European Commission to mislabelling and fraud as well as to environmental ambitions. Businesses and consumers also want more assurances on their seafood. Read on to learn how to get your products into the European market and what the mandatory market and niche requirements are.

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## 1. What are the mandatory requirements for fish and seafood?

Your products will have to be correctly labelled, with proof of source and with all necessary health certificates. While there is a lot to think about, the following section will give you an overview of the most important requirements for you to consider. Meeting all requirements starts in your country of origin. These requirements are enforced by your government through a competent authority.

### Country and processing facilities need to be accredited

Before you can export your products to Europe, your country needs to be accredited by the European authorities. For this reason, your country needs to have regulations and capacity in place to ensure that the fish and seafood produced in your country will meet European food safety requirements, and pose no threat to European consumers.

Once your government applies for European Union approval for exports of fish and seafood products, the European authorities will engage in a dialogue and appoint a "competent authority". This authority will be responsible for developing and implementing the regulations that meet the European requirements.

The competent authority is the government department in your country that the European Union appoints to be the most capable (competent) of monitoring the seafood and fisheries products to be sent to the European Union to ensure the safety and quality of the food. The European Union concludes an agreement with this department, giving them responsibility for the mandatory control measures before export.

Usually, the competent authority is a department in the ministry in which aquaculture and fisheries are regulated. For example, the competent authority in Peru is the Organismo Nacional de Sanidad Pesquera (SANIPES); in Costa Rica the National Animal Health Services (SENASA); in Senegal the Directorate of Fish Processing Industries; in Bangladesh the Department of Fisheries in the Ministry of Agriculture, Fisheries and Rural Development; and in Vietnam NAVIQAD, the Quality Department of the Department of Fisheries in the Ministry of Agriculture.

Once a competent authority has been appointed, and once the European Union has granted approval for fish and seafood exports to Europe, that authority can approve your facilities for export to Europe. The competent authority is responsible for keeping the lists of establishments up to date. If any changes occur, they will use the TRACES-NT system to inform the European Union of any changes.

Representatives of the competent authority in your country will visit and audit your facilities to ensure that the regulations are met. Key requirements that you as an exporter need to meet are implementing the hazard analysis and critical control points (HACCP) standards and the ability to trace your products back to registered fishing vessels or aquaculture farms.

HACCP is a method to control your processing operations. The method helps you to identify possible issues, and teaches you how to prevent and resolve them, with the aim of ensuring hygiene, safety and traceability. Europe has one of the highest food safety standards in the world. Products that are found to be non-compliant will be registered and reported in the Rapid Alert System for Food and Feed (RASFF).

European Union regulations on food hygiene cover all stages of the production, processing, distribution and placing on the market of food intended for human consumption. The European Union's hygiene rules include the following:

- Primary responsibility for food safety rests with the food business operator;
- Food safety is ensured throughout the food chain, starting with primary production;
- General implementation of procedures based on the hazard analysis and critical control points (HACCP) principles;
- Application of basic hygiene requirements, possibly further specified for certain categories of food.

Every couple of years, an audit team of the European Union authorities will visit your country and meet with your competent authority. The European Union will audit the systems in place and will visit some facilities throughout the supply chain in your country to see whether regulations are implemented properly. In an audit report, the European Union auditors will report on their findings and provide recommendations for improvement if shortcomings are identified.

It is crucial that the competent authority and the stakeholders in the fish and seafood supply chain in your country cooperate with the auditors and take action to implement the recommendations made. If the recommendations are met, the European Union will not take any action. However, if your authorities refuse to follow the recommendations, the European Union might eventually take measures against your country. In the most extreme cases, this situation might result in a trade ban for the whole sector.

Important to realise is that if you want to export cultivated fish and seafood to Europe, your government authorities need to get special approval based on a Residue Monitoring Plan (RMP). The RMP needs to get approval from the European authorities and will be audited separately every 2 or 3 years.

Although these regulations have already been in place for many years and do not change regularly, this requirement is the most crucial one that you and your country need to meet. There are countries that only recently got access to the European Union market for aquaculture products, such as Myanmar, or countries which are still working on getting access, such as Nigeria. It is a lengthy process that requires commitment from all the involved stakeholders in your country.

**Tips:**

On the EU traces portal, see whether your country is already listed by the European Union, and which companies in your country can export fish and seafood to Europe.

On page 4 of this publication from the European Union, read more about what the authorities in your

country must do to get approval to export fish and seafood products.

Contact Open Trade Gate Sweden if you have specific questions about rules and requirements for Sweden and the European Union.

## Maximum residue levels must not be exceeded

The European Union has strict and complex regulations on maximum residue levels (MRL) for fish and seafood. These levels are written down in different regulatory documents. Depending on the species and the source (fisheries or aquaculture), you need to prove for every shipment that your products do not exceed the relevant maximum residue levels by providing a health certificate produced by an accredited laboratory with your shipment.

If you want to export to Europe, you need to have systems in place in your processing establishments and upstream in your supply chain. You need to ensure that the raw materials which you source meet European standards and are not already contaminated when they enter your factory. You must ensure that your suppliers handle products with care by maintaining a proper cold chain and hygienic storage facilities. You will be responsible if a container is rejected when it enters the European port.

The regulations of which you should be aware when you export fish or seafood to Europe are the following:

- Regulation (EC) No 470/2009 lays down the procedure for setting MRLs for residues of pharmacologically active substances in food of animal origin, such as antibiotics. See the complete list of substances and their MRLs in the Annex to Regulation (EU) No 37/2010;
- Regulation (EC) No 396/2005 establishes European Union MRLs for pesticides. They are laid down in various Regulations and a publicly available database is maintained by the European Union;
- Regulation (EC) No 1881/2006 lays down MRLs for specific environmental contaminants such as heavy metals, including mercury;
- Some other substances classified as "feed additives" in the European Union (coccidiostats and histomonostats) may also leave residues in food derived from animals reared on feed containing them. See the European Union Register of Feed Additives.

Although European Union regulations are already complex, not all types of residue are included or clearly set. Now and then, regulations change when the European authorities start monitoring a particular residue more strictly. Your authorities also have a role to play. In the national plans developed by your competent authority, your authority decides on the list of residues relevant to your country's fish and seafood industry.

Chlorate levels in imported fish and seafood are one of the residues that came into focus in 2019, and a tighter MRL was expected shortly after. Processing establishments that do not have access to clean water use chlorate to treat the water before it is used in the processing facilities. At the end of 2019, German authorities found levels of chlorate in imported fish and seafood products, raising concerns about these products' safety for human consumption.

As a result of the concerns raised in Germany, a debate was started about what chlorate levels are reasonable. In 2020 it was decided not to change the levels of chlorates in food exported to Europe yet, but to review this every five years. An update can therefore be expected in 2025. Chlorate-based pesticides have already been banned. Of course, these types of changes can have an enormous impact on your operations, and it is crucial for you to stay on top of this in order to be as prepared as possible when changes to regulations are made.

As the fish and seafood industry matures, authorities become more aware of the kinds of issues that affect the trade of imported fish and seafood, such as the levels of certain substances found in products and the labelling

of those substances. Some importers in Europe therefore expect that European regulations will become stricter. Chlorate is only one example; another example is the use of antibiotics in cultivated seafood, the regulations for which change regularly. We expect the fish and seafood trade to be fully regulated and controlled by 2030.

> **Tips:**
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> Take out insurance on the cargo you ship to Europe to cover financial losses when a container is rejected at the European port. For example, read more about seafood cargo insurance on the website of DLV, a leading cargo insurance provider.
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> Contact your European buyer for the latest updates on European regulation changes.

## Labelling regulations must be strictly followed

European regulations on labelling are clear. There might, however, be slight differences between the labelling of unprocessed and processed fish and seafood, and between the labelling of wild and cultivated fish and seafood. In general, the following information needs to be labelled on seafood products, with pre-packed products having some additional information needs that products which have not been pre-packed do not need to include.

All products:

- The name of the product, including the commercial and scientific names;
- List of ingredients (including all relevant E numbers, which are the identifying numbers given to the substances that the European Union permits to be added to food), to be added to the outer carton label;
- Production method – it must be mentioned whether it is a cultured product or wild catch;
- Origin – reference the country where they are produced;
- Net weight – the net weight must be mentioned on pre-packed products;
- Date of minimum durability, consisting of the day, month and year, in that order and preceded by the words "best before" or "best before end" or the "use by" date;
- European Union seller – the name or business name and address of the manufacturer, packer or seller established in the European Union;
- The packaging must contain a European Union approval number;
- The packaging must also contain a "lot number", which a is number that is given to products belonging to the same batch from the same exporter;
- Nutrition – ingredients and nutritional value must be mentioned.

Additional information for pre-packed products:

- List of ingredients (including all relevant E numbers, which are the identifying numbers given to the substances that the European Union permits to be added to food), to be added to the consumer packaging label;
- Quantity of ingredients (as a % of the total net weight);
- Net weight;
- Name or business name and address;
- Country of origin or place of provenance;
- Instructions for use (only if needed);
- Nutrition declaration;
- Packed in a protective atmosphere;
- Date of first freezing (the right date of freezing needs to be agreed on with the buyer. Some buyers prefer the first date that raw materials are frozen; for example, when a fish is caught and frozen on board, even if it is not yet in its final form. Other buyers may want the date of freezing to be the first time that the product is

frozen in its final form; for example, fish fillets rather than the whole fish frozen on board);
- Added proteins of different origins;
- If a product is processed, such as surimi or fish balls, this information needs to be mentioned (a preparation of…);
- Identification mark;
- Added water needs to be included as an ingredient.

The last point needs extra attention. Added water remains a continuous point for discussion among importers and European authorities. Although it is clear that water needs to be mentioned on the package, it is not always clear how water content should be measured and how it should be labelled. There are also differences in interpretation between the Member States.

Water should always be mentioned on the ingredient list in the order of its share of the product's total weight compared with other ingredients. For example, if 8% water is added, the label should read 92% fish, 8% water, followed by any other ingredients.

In the case of processed fish, if less than 5% water is added, the order in which water is mentioned on the ingredient list is not important. However, suppose more than 5% water is added. In that case, water should not only be mentioned in the ingredient list, it also has to be stated explicitly in the name of the product, which should read "shrimp with added water", for example.

In Germany, authorities apparently take it a step further; if more than 12% water is added, the seller is no longer allowed to name the product as shrimp. Instead, a product with more than this amount of added water should be labelled a "preparation from shrimp".

The consequences of the interpretation of the Regulation are far-reaching, affecting not only consumer perception but also the customs code under which the shrimp product has to be imported. As "preparations from" fish or seafood fall under HS16 instead of HS03, they are subject to higher import duties that increase the price of the product. Authorities in the Netherlands claim not to go this far, as long as importers assure that the product name is not misleading for consumers.

## Tips:

The debate about how to deal with added water in seafood labelling is still ongoing. As the impact of decisions can be large, we recommend that you stay on top of the issue by asking your contacts in Europe for regular updates.

Check the EU's pocket guide to understand the European Union's requirements for fish and seafood labelling and to investigate the differences in label requirements between processed and unprocessed products.

Visit the European Union Trade Helpdesk for more information on import rules and taxes in the European Union

Learn country-specific labelling laws. For the European Union, it is important to put the right commercial and scientific name of your product on the product label, and there are also differences between European Union Member States. For example, grouper is labelled as a general group (Grouper – *Epinephelus spp.)* in Germany and the Netherlands, but you need to label the grouper with its specific commercial and scientific name (Mérou loutre – *Epinephelus tauvina*) in France. The European Union website shows what commercial designations are recognised in the different European Member States.

## Prove that your fish and seafood come from legal sources

The European Union Regulation to prevent, deter and eliminate illegal, unreported and unregulated (IUU) fishing came into effect on 1 January 2010. According to the European Union, IUU fishing is any fishing in forbidden areas, uses illegal methods or goes unreported. IUU fishing harms the sustainable management of global (and local) fish stocks, and creates unfair competition against those who fish legally and responsibly.

The European Union requires you to prove that your fish and seafood do not come from IUU fisheries. Your wild fish products need to be sent with a catch certificate that is approved by your competent authority. The catch certificate shall contain all the information specified in the specimen shown in Annex II of the European IUU legislation. You can only obtain a catch certificate for fish and seafood purchased from vessels which are registered and licensed by the competent authorities in your country.

The European authorities have committed to increasing their efforts to sustain the health of global oceans, which is reflected in the pressure that authorities put on developing countries to comply with the IUU Regulation. Several countries such as Thailand, Vietnam and Ecuador have been confronted by yellow cards that require the authorities in the countries to take action against IUU fisheries. If the government does not take action, European authorities might impose a red card, which would mean a ban on European imports of fish and seafood from that origin.

### Tips:

For an overview of countries which are currently confronted with yellow or red cards, check this overview presented by the Europe-based non-governmental organisation IUU Watch.

To read a summary of Europe's IUU regulations, check this European Union publication.

Check this write-up about the European Union CATCH system which will eventually replace the old paper-based catch certificate system. Currently, the CATCH system is not a must for non-European Union countries.

## The EU system for guarantee of origin

If you export fish and seafood products, you might benefit from reduced or even removed import tariffs. This is the case if they are from a country that is listed as 'Standard GSP', 'GSP+' or 'EBA' (Everything But Arms) with regard to the European Generalised Scheme of Preferences (GSP). However, you will only get this benefit if you can prove that the product which you export originates from the country from which it is exported. You need to prove this fact and the European Union has an IT system you can register it in: the Registered Exporter System (REX).

The REX system was introduced by amending Regulation (EU) No. 1063/2010 in the context of improving the GSP Rules of Origin (RoO) in 2010. Although most elements of this Regulation had already come into effect by 1 January 2011, the REX system was deferred until 1 January 2017. There was a subsequent transition period until the end of 2020 for GSP beneficiary countries to move from the previous system of origin certification to the new REX system.

To get registered, you have to file an application with your country's competent authority. The competent authority will register you as an exporter in the REX system, after which you receive a registration number (the REX number). If registered in the REX system, you can use this REX number for all arrangements for which the REX system is authorised, such as providing the guarantee of origin.

## Inspection of seafood products at the border

After shipment, your consignments must enter the EU via an approved Border Inspection Post under the authority of an official veterinarian in the EU Member State. Usually, not all consignments will be subjected to a physical check; however, systematic documentary checks and identity checks are common. The frequency of physical checks depends on the risk profile of the product and on the results of previous checks. Consignments which are found not to be compliant with EU legislation shall either be destroyed or, under certain conditions, re-dispatched within 60 days. In addition, the exporting company can be blocked and the competent authority can face disciplinary action.

European buyers have not added any requirement related to COVID-19 (such as nucleic acid testing, fumigation and other sanitary measures imposed by China on seafood imports). Unlike China, which has strict biosecurity on seafood imports, in general, Europe does not associate COVID-19 with food safety issues.

If your seafood product must transit through the EU in order to get to the UK, it must enter the EU territory via a Border Control Post and each consignment will need a Common Health Entry Document. Importers will need to notify the UK authorities using the new import notification system (IPAFFS: Import of Products, Animals, Food and Feed System). If your products do not travel to the UK via the EU, they need to be accompanied by a health certificate issued by the country of origin.

## 2. What additional requirements and certifications do buyers ask for in the fish and seafood sector?

Beyond the requirements placed on you by European countries, most buyers will have a range of standard requirements. Buyers will want proof that your company and its facilities live up to specific food safety standards and social and environmental responsibility. For example, sustainability certifications are already a market entry requirement for the northwestern European retail markets, and are a growing requirement across

other regional and end-consumer markets.

Table 1: Most important certifications requested by buyers in the fish and seafood sector

| Name | Type | Cost | Most used in European end-markets | Further information (with a link) |
|------|------|------|-----------------------------------|-----------------------------------|
| British Retail Consortium Global Standards (BRCGS) | Food Safety | The cost (and time) of the certification audit will vary depending on the complexity and size of the company as well as the certifier's rates and travel expenses. | Europe-wide, but focused on retail | Read the steps on how to get a Food Safety Certificate. |
| International Featured Standards (IFS) | Food Safety | The average price for the 2-day audit for SMEs and 3-5 products is usually in the range of €3,000. Additional costs include annual re-certification. | Europe-wide, but focused on retail | Visit the IFS website for more information on certification or perform a self-assessment with the smartphone application IFS Audit Manager |
| Social Accountability International's (SAI) SA8000 Standard | Social | You first have to do a self-assessment, costing US$300, after which the certification cycle can be free or costs up to US$1500/day for the auditor. | Europe-wide | Read this overview of aspects on which you will be audited to get SA8000 accredited. |

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|---|---|---|---|---|
| Marine Stewardship Council | Sustainability | Anecdotal information from certified fisheries suggests the cost can vary from US$15,000 to US$120,000. Costs for Chain of Custody certification are significantly lower. | UK, Netherlands, Germany, Belgium | Read the MSC fishery certification guide and MSC's capacity building programme |
| ASC | Sustainability | The cost (and time) of the certification audit will vary depending on the complexity and size of the company as well as the certifier's rates and travel expenses. | UK, Netherlands, Germany, Belgium | Aquaculture Stewardship Council shares information about ASC standards, group certification and ASC improver programmes |
| Global G.A.P | Sustainability | Use of the GGN standard is free, but there are audit costs as charged by independent certifiers. There is a one-time registration fee for companies using the logo, topped by a volume-based fee. | Germany, Switzerland | GLOBALG.A.P. provides 5 steps to get certified |
| Best Aquaculture Practices | Sustainability | There is an application fee, an audit fee and a programme fee specific to each type of standard. | Europe-wide | Read about the experiences from other producers that received BAP certification, showing timelines for the certification process. |

| Organic (EU standard) | Sustainability / organic | Average fees are around €750 for SMEs and the certificate must be renewed every year. | Germany, Spain, France, Italy, UK | If you have questions about EU rules for organic production, consult the EU's Frequently Asked Questions on organic rules. |
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Source: Seafood-TIP

## Food Safety Certification

Food safety regulations of the European Commission are regarded as one of the most, if not the most, stringent legal food safety standards. Nevertheless, most European buyers will have additional food safety requirements. Certainly in retail and most foodservice and wholesale markets, European buyers will require you to have your facilities certified by a third party. The most commonly required standards are British Retail Consortium (BRCGS) and International Featured Standards (IFS).

The industry is working on harmonising food safety standards and increasing mutual acceptance through benchmarking third-party food safety schemes by the Global Food Safety Initiative (GFSI). As more schemes are getting benchmarked by the GFSI, it is likely that retailers and other distributors will accept multiple schemes, reducing pressure on suppliers to have multiple third-party food safety schemes in place.

### Tips:

Check the websites of the BRC Global Standards company and IFS to find out more details about the standards and certification requirements.

Search for your country and other ones that produce your product in the BRCGS database, and find out which of your competitors are already BRC-certified.

## Social compliance certification

While United States supermarkets often have their own social compliance audits and certificates, European supermarkets often require their suppliers to be certified for social compliance by a third party. Like food safety certification, social compliance certification is mainly relevant for your processing establishments. These certificates relate to the rights, health and incomes of the people working in your facilities, and also in your broader supply chain, but it can be more difficult for you to certify your complete supply chain according to these standards at the moment.

In Europe, the most widely accepted third-party social compliance accreditation schemes are Social Accountability International's (SAI) SA8000 Standard and the Business Social Compliance Initiative (BSCI). While SA8000 is really a compliance tool, BSCI goes much further and requires accredited companies to show that they are making continuous efforts to improve the situation where a shortcoming is found. The fewer shortcomings and the more progress, the better the BSCI rating will be.

With many allegations concerning labour rights being made about several fisheries around the world (such as the use of slave labour and human trafficking), taking social responsibility seriously and working on third-party social compliance certification might make you a frontrunner in your sector. And a preferred supplier in the European market.

An example of a company known for its campaign for the welfare of its workers is Omarsa, an Ecuadorian shrimp exporter. Omarsa is a member of Sedex, which enables its members to improve business practices and working conditions in the global seafood supply chain. Their corporate social responsibility (CSR) plan includes water projects for the communities near shrimp farms as well as livelihood projects. Check out Omarsa's CSR projects and their environmental and social footprint.

More recently, besides the dedicated social certification schemes, some sustainability certifications have also been adopting social compliance in their standards. An example is the Aquaculture Stewardship Council (ASC), which includes fair wages and contracts for employees of certified companies. As an exporter, be aware that these standards are not yet fully developed, and most buyers will require an existing social compliance certification.

> **Tips:**
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> Check the website of the Seafood Slavery Risk Tool and enter the fishery in which you are involved to find out what they say about the risks of slavery in your supply chain.
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> To have a better understanding of other social risks that NGOs campaign against in the seafood industry, check the report of Fairfood, which addresses labour issues in the shrimp industry.
>
> Browse the website of the Aquaculture Stewardship Council (ASC) to understand how they work with social compliance in their standards.

## Sustainability certification

Consumers can learn that your seafood has been produced sustainably thanks to sustainability certification. An ecolabel is placed on the finished product of certified seafood, which you may find at the supermarket and more frequently in the restaurant sector. The demand for certified seafood is growing, and Europe is already home to the biggest concentration of certified seafood products.

In contrast to food safety and social compliance certification, sustainability certifications relate to your processing establishment as well as the primary production location from which you source your raw materials. Certification standards first and foremost provide assurance about sustainability at the fisheries and farm level. Fisheries standards certify fisheries (which can entail a single fisheries company with several vessels or a group of companies working together). Aquaculture standards certify farms or groups of farms.

If you want your seafood products to stand out and compete in the European market, offering certified sustainable products is essential. In fact, a rising number of European buyers actively demand that your primary production facilities be certified. If you do not have a sustainability certification yet, having a Fishery Improvement Project (FIP) in progress can also help you to find buyers and gain market access.

By far, the largest global certification standard for wild-caught fisheries is the Marine Stewardship Council (MSC). The Best Seafood Practices (BSP) is a recently established certification programme that assures the marketplace that wild seafood has been harvested and processed in an ethical manner. The largest three standards for aquaculture are the Aquaculture Stewardship Council (ASC), Best Aquaculture Practices (BAP) and GLOBALG.A.P.

Retailers are gradually moving away from committing to selling seafood with specific ecolabels and toward committing to selling seafood that is GSSI-benchmarked. As more certification becomes available on the market, the GSSI Benchmark enables retailers to purchase from a wider range of products and suppliers. This provides an opportunity for other standards to increase their presence in Europe. For you, it broadens the selection of

standards to consider for the certification of your facility.

The Global Sustainable Seafood Initiative (GSSI) is a public-private partnership on seafood sustainability. They developed a tool that benchmarks seafood certification schemes using the FAO Code of Conduct for Responsible Fisheries. GSSI-benchmarked certification standards are recognised by many retailers as being credible and trustworthy.

There is not just one single set of guidelines or requirements that you need to adhere to, as there are numerous standards for seafood certification which all function differently. All these standards are certified by a third-party organisation known as the Certification Body. This organisation will determine whether your business, operations and goods meet the requirements of a specific certification scheme. Finding out if your supply chain partners can obtain certification or a Chain of Custody certification is crucial. If they lack it or are unable to acquire it, your own certification is useless because the entire supply chain must be accredited.

## Tips:

For a full overview of certification schemes in the sector, consult the ITC Standards Map. Enter your sector or product, the producing region or country and the target destination region or country to see the relevant schemes.

Check out CBI's study exporting certified sustainable seafood to Europe to understand the needs and opportunities for Organic seafood in the EU.

Check the websites of the ASC and MSC to find out more about their certification standards, and also to see which of your competitors are already certified, if any. Please be aware that your products should be certified for their production methods and your facilities should be certified by the Chain of Custody certifications by either the ASC or MSC to ensure traceability in the supply chain.

Read about the GSSI, a Global Benchmark Tool, to understand their benchmark system and approved certifications.

Check the FIP database to see which fisheries are involved in a FIP and the progress they are making. The FIP profiles will also give you a better understanding of what you need to do to have a sustainable fishery.

## The European Green Deal

The European Green Deal (EGD) is the EU's response to the global climate emergency. EGD policies will likely impact trade within and imports to the EU, and environmental and sustainability standards may become stricter at a later stage. This will mean more requirements for businesses from developing countries that export to the EU. The EGD aims for ambitious GHG emissions reductions by 2030 and climate neutrality by 2050. But to achieve those goals, it is necessary to act much earlier. Some policies that will likely affect your business were already introduced in 2020, and more policies will be announced in the coming two years.

The European Green Deal, which aspires to create equitable, healthy, and ecologically sustainable food systems, is built around the Farm-to-Fork Strategy. The policy puts a strong emphasis on preventing food loss and waste, as well as on sustainable food production, processing and distribution.

This has an impact on production, since it means that regulations governing the harvesting, processing and distribution of your products in Europe will become stricter over time. In terms of sustainable consumption, there are already concrete plans to require origin information for certain products, setting minimum mandatory criteria for sustainable food procurement and a proposal for a sustainable food labelling

framework.

# 3. What are the requirements and certifications for fish and seafood niche markets?

The high-end retail niche market demands the use of new technology such as traceability or blockchain, and a much higher level of control of your supply chain. Consumers are more interested in the source of their seafood, which encourages traceability in retail and also stimulates the increase in organically certified seafood. The level of traceability can go as far as knowing which pond the shrimp came from or the name of the fisherman who caught the fish. As an exporter, it is not easy to fulfil these demands; however, it can provide you with broader market access and premium prices.

## Increased traceability demands in wild and farmed fish and seafood supply chains

Traceability innovators are offering an increasing number of traceability services and the market is showing interest, even if it is mostly just a niche market. If you supply fish or seafood to European retailers, you will sooner or later be confronted with requirements to avoid fraud, mislabelling and the risks of IUU products entering the supply chain. If you want to be a frontrunner, link up with traceability innovators and alternative feed protein producers working to resolve these issues.

Traceability, related to ruling out the risks of IUU practices and fraud, is becoming more important in the European retail market. Driven by new opportunities that are generated by new technologies on the one hand and driven by perceived reputational risks on the other hand, supermarkets take their traceability requirements more seriously than other markets.

Many European retailers are beginning to look beyond the traceability of the consumer products themselves and also consider the ingredients needed to produce those consumer products.

For farmed fish, reputational risks perceived by retail chains often relate to the use of fishmeal and oil from unsustainable or irresponsible sources that target overfished stocks or which use methods that damage ecosystems. Retailers themselves, but also suppliers, are working hard to take traceability to the next level.

Several retailers in Europe are involved in the Seafood Taskforce. The Seafood Taskforce is a non-profit organisation. Its members are made up of businesses, governmental organisations and non-governmental organisations. The taskforce aims to tackle IUU fishing, and the social and environmental damage that it causes.

The Seafood Taskforce is piloting a new tool, which enables them to track the origins of the different inputs to the farm; for example, tracing the fishmeal and oil which is used on the farm back to the boats and fisheries

that supply them. These retailers will require that their suppliers make an attempt to map the whole supply chain and all of its inputs, including the indirect ones. You can imagine the challenge involved.

A seafood company that is working hard to reduce supply chain risks is Thai Union. With partners such as Calysta and Corbion, which provide alternative proteins that can replace fishmeal and oil, Thai Union aims to produce a zero-fishmeal product range. Calysta's Feedkind single-cell protein and Corbion's algae-based protein can reduce the use of fishmeal and oil almost entirely. Calysta and Corbion are just 2 of the many innovators working on alternative ingredients.

Calysta's Feedkind product is an excellent example of how alternative ingredients can also help supply chain partners to increase the traceability of their products. With a simple test, it can be confirmed whether the consumer-packed product contains their Feedkind ingredient. If not, it identifies a gap in the chain of custody of the supply chain and the problem that needs to be addressed.

A DNA traceback is another way of increasing the traceability of products. It has already been used in other animal protein sectors for a long time, but it is now also being developed for farmed fish and seafood. United Kingdom supermarket chain Marks & Spencer and United Kingdom importer Seafresh announced already in 2017 that they would partner with Identigen, a DNA traceback technology company. The 3 companies claim that "this partnership will give guaranteed transparency… [and] that what they are buying is sourced from approved sources."

> ### Tips:
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> Although it is not discussed specifically above, because blockchain is often not mentioned in relation to IUU fishing, blockchain is one of the other major technologies driving innovation in seafood supply chains. Search for blockchain in seafood on Google and many pilot projects, such as those of IBM, turn up. One of the initiatives is FishCoin. Contrary to the others, where the focus is on transparency, FishCoin focuses on improving the livelihoods of small-scale fishermen and fish farmers.
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> Read more about digitalisation and transforming your business into a data-driven company in this CBI study on digitalisation.

## The organic seafood market requires certification for proof

Although there already was a rising demand for organic seafood in Europe because of consumers' increased concern for their health and the source of their food, the pandemic has accelerated this trend. In parallel, regulations governing organic agriculture are changing. The EU is creating new legislation for organic farming as the industry expands, which means that imported organic seafood will also be subjected to different regulations. It is crucial for you as an exporter to be aware that all goods must adhere to the EU Organic Regulation if you want to export seafood that is certified organic.

The EU Organic Regulation must be followed for all organic seafood entering the EU. These regulations forbid the use of synthetic fertilisers, pesticides, radiation, sewage sludge, and items created through genetic engineering. They provide the legal foundation for regulating organic agricultural, food processing, and labelling practices within the EU. These EU regulations have been maintained in the UK following Brexit.

Organic seafood can only be sourced from aquaculture because European Union organic regulations, with which all imported organic seafood must comply, does not allow wild-caught seafood to be certified as Organic seafood. The most common items to be found in the organic segment are species such as shrimp (black tiger shrimp and Pacific white shrimp), salmon and trout. Organic seafood always needs to be a native species to the place where it is produced. This means, for instance, that organic Pacific white shrimp can only be sourced from

the Americas, while organic black tiger shrimp can only be sourced from Africa or Asia.

This compliance will allow you to put the European Union green leaf on the package (see photo below).

Figure 1: Sample of organic shrimp found on the public website of Dutch retailer Albert Heijn



Source: ah.nl

The growth of organic agriculture has led to the development of new legislation for organic farming, which entered into force in January 2022. The most important part of this legislation for producers from developing countries is that you must comply with the same set of rules as those producers in the EU to ensure that all organic products sold in the EU are of the same standard.

Examples of other changes that will be made under the new organic legislation include:

- a strengthening of the control system to help boost consumer confidence;
- a new system of group certification to make it easier for smaller farmers to convert to organic production;
- a greater range of products that can be marketed as organic;
- a more uniform approach to reducing the risk of accidental contamination from pesticides.

There are private organic certifications in addition to EU standards. Remember that these private organic certifications sometimes go above and beyond EU rules for organic seafood and demand further restrictions. Because these private certifications are well-liked in specific markets, you should be aware of these labels. For example, Naturland is popular in the German market.

Imported organic food is also subject to control procedures to guarantee it was produced and shipped in accordance with organic principles. Regulation 1235/2008 describes the rules concerning the import of organic products from third-world countries. These are the rules that your buyer has to comply with when importing your products.

**Tips:**

Check out CBI's study exporting certified organic seafood to Europe to understand the needs and opportunities for Organic seafood in the EU.

Browse the EU website on organic farming for more information on the aims, the logo and the rules behind it.

Visit the IFOAM website to learn what they are doing to develop organic aquaculture further and support related activities.

For retail sales of organic food, the organic share of total retail sales, and per capita consumption of organic food for different countries, visit The World of Organic Agriculture 2021.

The study has been carried out on behalf of CBI by Seafood TIP.

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