

## **Executive Summary Report**

# FISH LIST WISH LIST: A case for updating the Canadian government's guidance for common names on seafood

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# EXECUTIVE SUMMARY

The ever-increasing complexity of seafood supply chains and lax labelling and traceability systems have led to a patchwork of allowable names for seafood products in the marketplace. In Canada, the guidance for naming seafood products comes from the Canadian Food Inspection Agency (CFIA) and is maintained through the Fish List. The Fish List contains entries for all seafood sold in Canada, including those harvested in Canada and imported seafood harvested internationally. The Fish List contains a database of these seafood species with corresponding English and French common names for companies and retailers to use on seafood packaging.

One of the most significant problems with the Fish List is that it allows for a single, often generic, common name to represent several species while at the same time allowing several common names to be used for a single species. A seafood package labelled as "rockfish," for example, could be one of more than 100 possible species, some of which are endangered and others that are sustainably managed. Furthermore, Canadian law currently only requires the common name of any seafood product on a label, and if imported, "the place of last major transformation;" for example, where the seafood was canned or filleted (also called "country of origin"). This is in stark contrast to best practice labelling modelled by the European Union where seafood product labels must contain the scientific name, production method, harvest method and geographic origin, in addition to the common name and country of origin. With the absence of a species scientific name on a label specifically, buyers lack the information they need to make informed choices, or are confused by misleading common names because seafood varies so much in its production, population health and the environment it grows in.

This report is a comprehensive analysis of the Fish List and recommends a suite of changes to improve the list's utility to improve traceability and labelling, and consequently human health and safety and conservation of seafood resources. First, SeaChoice examined which CFIA common names are used for multiple species. Next, we prioritized our analysis by narrowing our focus to Canadian wild-caught species. Within this subset, we examined the number of English common names for species against the following criteria: species prone to mislabelling, species prone to sustainability and health concerns and species that are subject to the U.S. Seafood Import Monitoring Program. Last, we examined the full Fish List, to identify inconsistencies and missing information to improve the guidance provided by the CFIA.

### **FINDINGS**

Our analysis of the most frequently occurring common names found four groups of common names to be highly problematic due to their association with the high number of species, the risk of ambiguity and the high occurrence of overlap among the associated genera and species. These groups of common names are 1) snapper, rockfish, rosefish, redfish and Pacific snapper, 2) sole and flounder, 3) shrimp and prawn and 4) dogfish and shark.

#### Our set of analyses of Canadian-caught species revealed:

- Twenty-four of the Canadian-caught species subset are commonly mislabelled in the marketplace. Of these, the species found to be most problematic due to their high number of CFIA common names are: *Gadus chalcogrammus* (walleye pollock), *Limanda ferruginea* (yellowtail flounder), *Oncorhynchus mykiss* (rainbow trout), *Reinhardtius hippoglossoides* (Greenland halibut) and *Sebastes alutus* (Pacific ocean perch).
- Fifty-six of the Canadian-caught species subset have sustainability concerns associated with their species or populations. Of these, the species found to be most problematic due to their high number of CFIA common names are: *Oncorhynchus tshawytscha* (chinook salmon), *Hippoglossoides platessoides* (American plaice), *Sebastes fasciatus* (Acadian redfish), *Sebastes mentella* (deepwater redfish) and *Sebastes ruberrimus* (yelloweye rockfish).
- Eighty-one of the Canadian-caught species subset have health concerns associated with species. Of these, the species found to be most problematic due to their high number of CFIA common names are: *Thunnus thynnus* (Atlantic bluefin tuna), *Mercenaria mercenaria* (northern quahog), *Prionace glauca* (blue shark), *Sebastes fasciatus* (Acadian redfish), *Sebastes mentella* (deepwater redfish), *Sebastes ruberrimus* (yelloweye rockfish), *Thunnus alalunga* (albacore tuna) and *Thunnus albacares* (yellowfin tuna).
- Twenty-three of the Canadian-caught species subset are subject to the Seafood Import Monitoring Program. Of these, the species found to be most problematic due to their high number of CFIA common names are: *Gadus chalcogrammus* (walleye pollock), *Prionace glauca* (blue shark), *Pandalus borealis* (northern shrimp), *Pandalus montagui* (aesop shrimp) and *Squalus acanthias* (spiny dogfish).

A combined impact assessment identified the species that generate the most concern across all four criteria. The most problematic groups of species are rockfish, tuna, shark, whitefishes of high commercial value such as halibut and cod, some flounder and sole and some species of shrimp. The top six species found to be of greatest concern were *Thunnus thynnus* (Atlantic bluefin tuna), *Sebastes fasciatus* (Acadian redfish), *Sebastes mentella* (deepwater redfish), *Sebastes ruberrimus* (yelloweye rockfish), *Squalus acanthias* (spiny dogfish) and *Reinhardtius hippoglossoides* (Greenland halibut).

Finally, our investigation into inconsistencies with the CFIA Fish List revealed that 14 species (or updated scientific names) are missing from the list and 16 species or genus-level entries are missing either an English or French common name, or both. Examination of the 99 genus entries in the Fish List shows 1,661 species are contained within the genus entries that are not captured by their individual scientific names on the Fish List. Accounting for the species represented by genus-level entries means the number of species on the Fish list jumps from 871 to a total of 2,532 species.



#### RECOMMENDATIONS

Based on our findings, we recommend that the CFIA make the following key changes to the Fish List to ensure proper and accurate seafood product labelling:

- Require the high-priority species identified in this report to be labelled only with the standard common name.
- Strengthen industry guidance to encourage the use of the standard common names instead of the generic common names, particularly the generic common names snapper, rosefish, redfish, rockfish, sole, flounder, shrimp, shark and dogfish.
- Remove common names that are misrepresentative from the Fish List altogether.
- Harmonize the common names of all species that are subject to the Seafood Import Monitoring Program such that they reflect the common names required for U.S. seafood product labels to uphold trade requirements.
- Add and update species and common names that are missing from the Fish List.
- Remove all genus entries and add any missing commercially relevant species as a species-level entry with one associated common name (the recognized standard common name) to the Fish List.

Our findings support widely described research that shows requiring a scientific name on a seafood product label would be the universal fix to address all other naming issues identified in this report. Furthermore, we recommend the CFIA dedicate additional resources to the implementation and enforcement of the Fish List to ensure compliance throughout the seafood supply chain.

To download the full report, visit: seachoice.org/fish-list-wish-list/



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