

Briefing to the Standing Committee on Fisheries and Oceans

Study on Traceability of Fish and Seafood Products

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Dear Fisheries and Oceans standing committee members,

Through years of working closely with the seafood supply chain, SeaChoice has noticed the recurring issues of inconsistent data, poor labelling and questionable traceability of seafood. At the same time, consumers are becoming increasingly engaged in understanding the origins of their seafood due to media exposure of issues related to environmental sustainability, mislabelling, health concerns, illegal, unregulated and unreported (IUU) fishing, quality assurances and human rights abuses. Furthermore, the “eat local” movement has increased the number of Canadians wanting to support local and/or domestic seafood producers. Many of these issues can be at least partially resolved through comprehensive product labelling and traceability.

Demand for stronger traceability is evident with recent polling in 2021 showing that 91% of Canadians think it is somewhat to very important that traceability laws require companies to track information like what species it is, how it was caught or farmed and where it was caught or farmed.¹ Further, a group of 26 seafood companies, grocery store chains and experts recently called on the Federal government to bring Canada’s seafood traceability standards into the 21st century.²

Canada’s current traceability and labelling requirements may, to an extent, serve important health and safety needs, but do little to support Canada’s seafood industry in maintaining market access or meeting the growing global call for traceability, nor does it help consumers or retailers ensure their seafood is sustainably caught.

With the 2019 Federal commitment to develop a boat-to-plate traceability program, Canada is in a unique position to integrate and align our seafood labelling practices with our major export countries, as well as lead the way in developing stronger seafood labelling and traceability standards that provide greater seafood transparency and sustainability.

SeaChoice’s key recommendations

We urge the government to take the following actions in developing a robust seafood labelling and traceability system in Canada. We recommend:

- Improving traceability standards to track key information, including at a minimum: what the product is (common and scientific name), where it is from (geographic catch area or harvest location and processing location), and how it was produced (farmed or wild caught and method) for all seafood sold in Canada.
- Strengthening seafood labelling regulations that include: the scientific name, the location of catch or the location of the aquaculture operation, the production method (farmed or wild) and the gear type or farming method.
- The Canadian government put in place proper measures to ensure data verification at key nodes within the supply chain, such as at the point of import or at retail sale.

¹ <https://www.seachoice.org/survey-seafood-labelling-traceability/>

² <https://www.seachoice.org/wp-content/uploads/2022/02/Boat-to-plate-stakeholder-sign-on-letter-Dec-2021.pdf>

- The Canadian government establish an interdepartmental committee to ensure all relevant departments and stakeholders work together.

Why do Canada’s seafood labelling and traceability standards need improvement?

Canada seafood labels do not allow consumers to make an informed choice

In our research, SeaChoice has found that the labels on seafood products usually lack critical information to allow consumers to make an informed choice, which may increase the potential for product misrepresentation. Our studies have found that retailers are doing a relatively good job of telling Canadians whether their seafood is wild caught, less of a good job with labelling its products as farmed, and doing a very poor job including the actual species, the country of harvest, and how the product was caught or farmed on labels.³ Without this information, Canadians only have a small amount of information on the package on which to base their purchasing decision.

The common name on a seafood product may not always sufficiently identify the fish or shellfish species and are often market driven at the expense of misrepresenting the product. Common names on seafood products may be too generic to identify the species or may mislead consumers into thinking the seafood product is an entirely different species. For example, “shrimp” is an acceptable common name for 41 different species with varying production/harvest methods. Businesses often label many different species of rockfish as “red snapper”, while the only true red snapper is *Lutjanus campechanus*. SeaChoice published a report in 2020, which outlines more of the issues with common naming in Canada and offers a number of concrete recommendations to improve the Fish List.⁴

Including the scientific name on a seafood label would help to reduce the rates of mislabelling that are present in Canada. In 2015, one of the largest transnational survey of seafood mislabelling was conducted in the European Union, and found a significant reduction in mislabelling rates (down to approximately 5%) after stronger labelling requirements has been implemented.⁵ **SeaChoice recommends the government work towards suggesting only one common name per species and requiring the scientific name on a label.**

The requirement for a “country of origin” label, meaning where the product was last majorly transformed (ie processed), on imported seafood products also does nothing to help consumers know where their seafood is actually coming from. This requirement is insufficient for seafood products, which are unique food commodities with complex global supply chains. Products are often processed in different countries than the one in which they were farmed, caught or landed. Consumers may want to purchase a product based on where it was caught or farmed if they have concerns about the health and safety of the harvesting practice and/or about the quality of the environment from which it was harvested. Canadian fishers/farms are at a disadvantage by geographic origin not being required because shoppers who want to support Canadian producers can't easily do so. For example, a Sockeye salmon caught in British

³ <https://www.seachoice.org/our-work/labelling-and-traceability/dna-testing/>

⁴ <https://www.seachoice.org/wp-content/uploads/2020/10/Fish-List-Wish-List.pdf>

⁵ <https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1890/150119>

Columbia Canada, but filleted and packaged in China would appear on a seafood label as “Product of China” in Canadian grocery stores.

The requirement to include geographic origin on labels is standard practice for key export markets such as the European Union (EU), which Canada has yet to recognize. **SeaChoice recommends that the geographic origin of seafood products - where the seafood was caught or farmed - be required on a label or packaging.**

Canada’s traceability regulations do not allow for accurate and important data to be passed from the point of harvest to the end consumer.

The Codex Alimentarius standard, on which the CFIA’s traceability regulations are based, provides some level of consumer protection for food safety. However, this standard only follows the movements of food through the specified stages of production, processing and distribution. It ignores other properties of a robust traceability system, such as documentation of product transformations and the ability to maintain critical information about the provenance of that product throughout the supply chain.

SeaChoice recommends developing an event-based traceability solution, such as the United States recently proposed rule for food traceability.⁶ The FDA has proposed an improvement in its domestic seafood supply, which includes critical tracking events with certain key data elements that must be captured along the supply chain. Improvements such as this could allow for better maintenance of lot information when these merging events occur by linking shipments and food through each point in the supply chain.

Many of Canada’s largest trading partners, including the United States, EU and Japan have implemented stronger traceability requirements, particularly with respect to import requirements. For example, the United States’ Seafood Import Monitoring Program requires importers to share data about seafood’s journey from point of harvest to US port, the EU developed a catch documentation scheme for all imported seafood products, and in late 2020, Japan became the third major seafood-consuming nation to impose traceability demands with a new law that requires proof of the legality of imported catch.

IUU fishing is prevalent within our global seafood supply chains, which poses huge risks to the health of ocean ecosystems, disrupts fisheries management efforts, affects the industry actors who depend on fisheries income and perpetuates the continued exploitation of slave labour and human rights abuses. With most of the seafood consumed in Canada from imported sources, **SeaChoice recommends Canada also develop traceability at the point of import, such as catch certificates, for products entering Canada, consumers cannot be sure if their seafood was caught sustainably and legally.** A traceability system should be co-designed with our seafood trade partners so that it can be applied seamlessly to imports and exports.

While the government has made some progress to shift to electronic data transfer systems since the Safe Food for Canadian Regulations were last updated, there is no requirement for the industry to retain all

⁶ <https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-proposed-rule-food-traceability>

records electronically. It is generally accepted and case studies have demonstrated that when electronic data capture and traceability is implemented, the data is more accurate, less subject to human error or fraud and easily facilitates monitoring and enforcement.⁷ Further, “one-up, one-down” traceability systems may not be sufficient for quick tracebacks because it results in untimely verification of product information, particularly when there is a reliance on paper-based records. **SeaChoice recommends the government consider shifting to a fully electronic system for better data recording and automated verification.**

Finally, **SeaChoice recommends the government examine ways of adding verification and enforcement procedures to current traceability regulations.** Verification is especially important to deter IUU seafood products from entering the supply chain. The capacity to cross-check product or related information at any point in the supply chain with data supplied by other actors is a critical aspect of traceability to ensure the legitimacy and accuracy of the data. Verification could include mass-balance checks, data entry checks, verification of data accuracy via landing documents or logbooks, verification of legal fishing through vessel AIS records, or DNA testing.

A standard government regulated traceability and labelling system would provide a level playing field for industry and support market access

Detailed product labelling and traceability are important tools to help companies back-up their environmental claims that they may make on packages or through their marketing. SeaChoice examined the types and legitimacy of claims made in 2019 through our study, *Certification, Verification or Fabrication? an investigation of seafood environmental claims in Canadian retailers.*⁸ The assessed claims included third-party certifications and endorsements, as well as private company self-declarations. We found that self-declared claims were the most frequent environmental claim type across the Canadian retail market. However, this means that most claims in Canada are not subject to any independent oversight or standard. SeaChoice found that of the self-declared claims on packages such as “sustainably caught” or “responsibly sourced”, 41% had no evidence to back up their claims. Improved seafood traceability and labelling standards would help consumers substantiate the environmental credentials and help create a level playing field among industry actors where businesses who don't invest in traceability can't undercut those that do.

Stronger seafood traceability systems will also ensure that Canada can easily maintain our market access as requirements and best practices evolve globally. Unfortunately, Canada is still lacking the traceability and data capture systems to efficiently comply with increasing regulations and is instead reacting to requirements as they come up. This is inefficient and costly. For example, SeaChoice has heard firsthand from government staff that as the US has rolled out their Marine Mammal Protection Act, there has been a lot of work to help processors prove compliance with the requirements.

The Canadian government has an important role in setting a strong traceability standard and levelling the playing field for the industry creating a more equitable and transparent supply chain. It is critically

⁷ <https://ipnlf.org/implementing-electronic-traceability-the-journey-of-anova-food-usa-and-the-indonesian-handline-tuna-fishery/>

⁸ <https://www.seachoice.org/wp-content/uploads/2020/09/Sustainability-Claims-Study-High-Quality.pdf>

important that the Canadian government provide the necessary support for traceability in Canada to avoid placing the burden solely on industry or private certifications as new demands arise.

Finally, SeaChoice recommends the Canadian government establish an interdepartmental committee to ensure all relevant departments and stakeholders work together to develop full-chain seafood traceability. There is an apparent confusion about how the boat-to-plate mandate fits within the departmental mandates and who has regulatory authority to move forward with this work. A committee composed of various authorities and stakeholders whose cooperation is needed to get the job done is critical.

About SeaChoice

SeaChoice is a Canadian sustainable seafood partnership among the David Suzuki Foundation, Ecology Action Centre and Living Oceans Society.

We have been working together since 2006 to improve sustainability and transparency in the seafood supply chain. SeaChoice has four key areas of work: (1) providing retailers with tools and incentives to improve their sustainable seafood commitments, (2) using market leverage to improve some of the least sustainable fisheries and aquaculture production, (3) ensuring that seafood certification and ranking systems are as robust as possible, and (4) improving seafood labelling and traceability through DNA testing and reforming seafood legislation in Canada.

We have been working together since 2006 to improve sustainability and transparency in the seafood supply chain, and we have actively engaged in the Canadian Food Inspection Agency's (CFIA) revisions to food labelling and traceability over the past four years.