

Canada's seafood at risk:

A comparative report on seafood import controls in Canada, EU, US and Japan

Globally, the issues of illegal, unreported and unregulated (IUU) fishing and illicit trade have proliferated through the seafood industry. IUU fishing includes a range of activities where fishing laws are broken or dodged and accounts for approximately 1 in every 5 fish caught worldwide.¹ These practices inhibit global and regional progress towards sustainable management of seafood production and disadvantages fishers and companies that act responsibly by adhering to the law.² What's more, mounting evidence reveals an intrinsic link between IUU fishing and forced labour and human rights abuses aboard fishing vessels.³

Over the last decade, major market states including the United States (US), the European Union (EU) and Japan, have introduced import control schemes to improve seafood traceability and transparency for seafood supply entering the market. These regulations aim to capture key information about seafood products as they move through the supply chain and are imported into the respective market, which can then be used to identify products of IUU fishing or seafood fraud. To date, the major import control schemes in effect include the EU's IUU Regulation, the US Seafood Import Monitoring Program and Japan's Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants.⁴ Some Regional Fisheries Management Organizations (RFMOs) have also developed catch documentation schemes that multiple countries adhere to alongside shared IUU vessel blacklists and Port State Measures to block illegal catch from entering member markets.⁴ Increased adoption of industry-led traceability initiatives such as the Global Dialogue on Seafood Traceability shows that industry actively favors harmonized international standards and adopting digital traceability rules to ensure transparency across global supply chains.⁵

While import controls have been developed by other countries, Canada is falling behind, leaving its market vulnerable to the entrance of products of IUU fishing. This creates an unfair playing field for Canada's domestic fisheries, disadvantaging law-abiding fishers and

reducing Canada's competitiveness. In December 2019, the Liberal government committed to implementing a boat-to-plate traceability system⁶, but very little progress has been made on this promise, and Canada remains without robust import control measures. Current reporting requirements for any food imported into the country fall under the Safe Food for Canadians regulations.⁷ However, it is not specific to seafood, and current information collected is not enough to detect and deter products of IUU fishing and other associated violations.⁸

How does Canada measure up to other countries?

There are 17 essential key data elements (KDEs) recommended by the EU IUU Fishing Coalition, US IUU Fishing and Labor Rights Coalition, and IUU Forum Japan for achieving a robust baseline of information for imports that will help authorities detect and prevent products of IUU fishing from entering their market.⁹ Using the 17 KDEs, SeaChoice has compared Canada's import reporting requirements to those of the EU, US and Japan (see table 1). The table uses data published by the EU IUU Fishing Coalition in 2025.¹⁰

Canada's current seafood imports are only required to report three of the 17 (12%) recommended KDEs and one partially, this is an extreme underperformance compared to other market States (see table 1):

- EU: 100% alignment (17 out of 17 KDEs).¹⁰
- US: 71% alignment (12 out of 17 KDEs), with three conditional or those that partially meet requirements.¹⁰
- Japan: 71% alignment (12 out of 17 KDEs), with four conditional or those that partially meet requirements.¹⁰

Canada's import compliance with RFMO's

Canada is a member of 7 RFMOs, the International Commission for the Conservation of Atlantic Tuna (ICCAT), which has an established electronic catch documentation scheme for Atlantic bluefin tuna, the Inter-American Tropical Tuna Commission (IATTC), North Pacific Fisheries Commission (NPFC), North Pacific Anadromous Fish Commission (NPAFC), Northwest Atlantic Fisheries Commission (NAFO), North Atlantic Salmon Conservation Organization (NASCO) and Western and Central Pacific Fisheries Commission (WCPFC).¹¹ Additionally, Canada commits to implementing the catch document requirements for Antarctic or Patagonian toothfish under the Convention for the Conservation of Antarctic Marine Living Resources (CCAMLR).¹² While these organizations' reporting requirements do not satisfy all of the recommended KDEs in this report, ICCAT aligns with at least 40% of the KDEs, with the CCAMLR having 76%.⁴

Canada is already complying with more detailed RFMO requirements and can use this existing infrastructure to easily expand to all or most seafood imports.

Table 1: Analysis of the seafood import controls in Canada, EU, US, and Japan

● KDE is required ● KDE is optional or needs improvement ● KDE is not required

	Key Data Element (KDE)	Canada ⁷	European Union ¹⁰	United States ¹⁰	Japan ¹⁰
WHO 	Vessel name	●	●	●	●
	Unique vessel identifier (IMO number)	●	●	●	●
	Vessel flag	●	●	●	●
	International Radio Call Sign (IRCS)	●	●	●	●
	Information on exporter / re-exporter	●	●	●	●
WHAT 	Identity of import company	●	●	●	●
	Product type	●	●	●	●
	Species name - ASFIS 3-Alpha Code	●	●	●	●
	Estimated live weight (kg)	●	●	●	●
	Processed weight (kg)	●	●	●	●
WHEN 	Transshipment: Declaration and authorisation at sea, IMO number and vessel master info	●	●	●	●
	Event date	●	●	●	●
	Catch area (distinction between EEZ and high seas)	●	●	●	●
WHERE 	Authorisation to fish	●	●	●	●
	Port of landing	●	●	●	●
	Processing location	●	●	●	●
HOW 	Fishing gear type or catch method	●	●	●	●

Recommendations

If Canada does not act, we risk furthering marine biodiversity decline, perpetuating human rights abuses, squandering food security and preventing economic prosperity of the industry. Canada is also at risk of becoming a target market for seafood products tried to IUU fishing and forced labour as other countries are tightening and closing loopholes in their seafood import regulations. It is critical that Canada maintain its competitive access to markets given the large value of exports of fish and seafood it produces, and that Canadian consumers have access to ethically sourced seafood.

Canada has the unique opportunity of developing a seafood import control system that learns from the mistakes of existing systems and enters into force as a robust and effective system that both strengthens the Canadian market and deters products of IUU fishing.

We urge the Canadian government to:

- Develop a new import control scheme that requires reporting of key data and facilitates full chain traceability of seafood products entering Canada, in line with those of trade partners.
 - Ensure that lessons from existing systems are implemented to make the system as efficient as possible from the beginning, for example developing a fully digitalised import control scheme that aligns and recognises the requirements of key trade partners will reduce administrative costs and risks of data falsification seen in current paper-based systems.
 - Provide and maintain sufficient funding, staffing and capacity to support effective establishment and implementation of the import control scheme
- Change seafood labelling regulations to 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.
- Continue funding international bilateral fisheries monitoring missions and improve information sharing with countries across the seafood supply chain to strengthen compliance and oversight
- Establish domestic electronic monitoring standards, expand on-vessel fisheries observation levels, and invest in modern data processing tools in order to improve domestic fisheries management and science and meet Canada's international commitments

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