



What do we know about the seafood we buy in supermarkets?

Case studies of Belgium, France, and Spain

Introduction

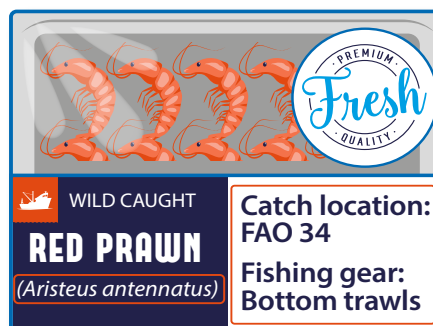
The European Union (EU) is one of the three largest seafood markets in the world. With imports representing 70% of all seafood consumed in the EU,¹ it has one of the strongest legal frameworks globally to prevent illegally caught seafood from entering its market. Traceability requirements for fresh, frozen and smoked seafood products within the EU are also very strong, requiring key information such as species name, origin, catching method and production method to be passed along the supply chain all the way to consumers.

In contrast to fresh seafood, traceability requirements for processed products like canned tuna and fish fingers remain weak. This is a significant problem, as these products are very popular in the EU. For example, in 2021, 93% of French households bought canned seafood products.² **Processed seafood represents 22% of fishery and aquaculture products consumed in the EU.**¹ According to a 2021 Eurobarometer survey on consumption habits, nearly one third of respondents eat tinned fishery and aquaculture products once or twice per month.³ Certain popular processed products, particularly shrimps, prawns, and tuna, are of particular concern for traceability, because they have a higher risk of being associated with illegal, unreported, and unregulated (IUU) fishing or human rights violations.⁴



© OCEANA / Enrique Pardo

Labels on fresh and frozen fish and aquaculture products must indicate the species (including the scientific name), catch location, and fishing gear, while **processed seafood such as canned tuna, canned sardines, and surimi are exempt from these requirements.**



This means that consumers do not have basic information about their seafood, such as which species they are eating. For example, a canned product might simply be labelled “tuna”, which could refer to any of 14 different tuna species, including overfished stocks. Additionally, **there is no labelling requirement for information on the origin of the product**, which prevents consumers from being able to choose to avoid certain regions for political, environmental, or human rights concerns. Similarly, information about **fishing gear, especially if sufficiently precise, can inform consumers about associated environmental impacts**, such as the risk of seabed damage or bycatch of protected species like turtles or cetaceans, or of juvenile fishes.

Seafood supply chains are complex and often span multiple continents before reaching consumers. In addition, **seafood products are the most globally traded animal protein** in terms of trade value.⁵

A single product can be caught by a Chinese vessel in the South Atlantic, shipped to China to be processed, and then exported to the EU. For example, 50% of Atlantic cod consumed in the EU and 70% of the Alaska pollock consumed in the EU is caught by Russian vessels.^{6,7} Over 90% of Russian-caught pollock is processed in China, including products that ultimately reach the EU market. In 2022, EU countries imported seafood products from Russia worth 920 million euros.⁸

Popular processed foods such as fish sticks (which are often made with imported seafood), from well-known brands such as the parent company of 'Iglo', have been linked to forced labour in fish processing plants and human rights violations at sea.⁹ Recent investigations by the Outlaw Ocean Project have exposed forced labour cases in Chinese seafood processing factories with Uyghur and North Korean workers, as well as human rights violations and IUU

fishing within the Chinese squid fleet. This research revealed that 54 European companies based in Belgium, France, and Spain, and a company supplying the European Parliament were importing seafood products from China with possible links to human rights violations.¹⁰

Enhanced traceability and transparency not only empower consumers to make informed and sustainable choices, but also help national and European enforcement agencies in combating IUU fishing, food fraud, human rights violations, and illicit international trade.⁴ Moreover, being able to show that seafood products have been legally caught has **positive impacts for companies**. A study by Planet Tracker showed that an investment of just 1% of the seafood industry's revenue in traceability could increase profits by 60%.¹¹



© Freepik

We consumers have the right to know and choose what we eat


For this reason, the Follow the Fish movement led by Oceana calls for essential consumer information (species, origin, fishing gear, and production method) to be included on the labels of all seafood products, and to require the food service sector (including restaurants, hotels and mass caterers) to provide this information, by strengthening the regulation on the Common Market Organisation (CMO) for fishery and aquaculture products.¹²


This report sheds light on the differences in the information provided on the labels of fresh/frozen versus processed seafood products sold in the EU. To illustrate these differences, we analysed the information included on seafood labels for products sold in three EU Member States: Belgium, France and Spain.


Our analysis found that fresh and frozen seafood products provided more information than processed products. **In contrast, for 38% of processed seafood products in Belgium, France and Spain, it is impossible to know the species, the origin and the fishing gear used.** This shows that consumers do not have enough information to make informed choices about their seafood.

In light of these findings, **Oceana calls on EU decision-makers to revise the Common Market**

Organisation (CMO) Regulation, which sets fishery and aquaculture product labelling requirements, to:

- 

Require key information (i.e. species, origin, fishing gear, and production method) for all seafood products, including processed fish and seafood.
- 

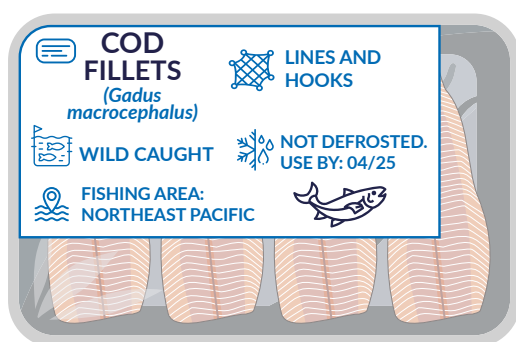
Require the food service sector (such as mass caterers, hotels, and restaurants) to provide this key information (species, origin, fishing gear and production method) to their customers.
- 

Require science-based sustainability information to be displayed on all seafood products.


What consumer information is currently required on seafood products?


The Common Market Organisation Regulation for fishery and aquaculture products (CMO Regulation)¹³ and the Food Information to Consumers Regulation (FIC Regulation)¹⁴ are complementary EU laws that regulate the labelling requirements for fishery and aquaculture products, both produced in the EU and imported. The FIC Regulation establishes general consumer information requirements that apply to all food products, including details on ingredients, food business operators, and the country of origin, particularly if their omission may mislead consumers.


The CMO requires that specific consumer information is included on fresh and frozen products from fisheries and aquaculture (including those that are precooked) and certain processed products (e.g. smoked fish), regardless of whether they are packaged or not. This mandatory information includes:




 Commercial designation and scientific name of the species.

 Production method (i.e. caught, caught in freshwater, or farmed).

 Area of origin (catch area, country and body of water, or country of production). For wild-caught marine products, this includes specifying the name or number of the FAO fishing area,¹⁵ (and also the FAO sub-area or division, if products are caught in the Northeast Atlantic, the Mediterranean Sea, or the Black Sea).

 Type of fishing gear used.¹⁶

 Whether the product has been defrosted, and the date of minimum durability.

While prepackaged products must display this information on their labels, non-prepackaged items such as those sold in fishmongers may use other methods, like billboards or posters. **Most processed products do not need to provide this information.**¹⁷ This is the case of canned seafood, caviar, marinated seafood, surimi, and fish sticks.

Case studies:

What do product labels in Belgian, French, and Spanish supermarkets tell us about our seafood?

Methodology

Oceana carried out case studies of seafood labelling information in three EU Member States: Belgium, France, and Spain which are in the top 10 of EU seafood consuming countries¹ In March and April 2024, we compiled and analysed the information included on the labels of fishery and aquaculture products sold in Brussels, Paris, and Madrid. We focused our sampling on supermarkets, as they are the main purchasing point for these products for nearly 80% of EU consumers.⁴ In each country, we sampled products sold in the two largest supermarket chains. In total, we examined the labels of 182 seafood products (65 fresh and frozen products, and 117 processed products).¹⁸ To ensure representativeness, a variety of species and products from both fisheries and aquaculture were included, representing a total of 131 brands.¹⁹

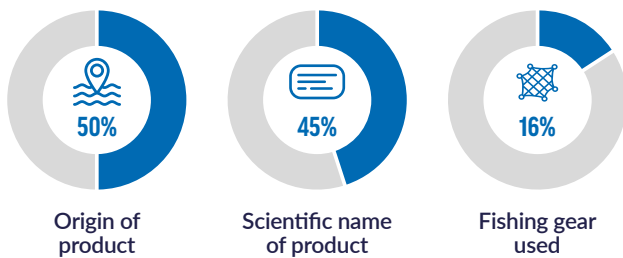
For each seafood product, we verified if the following basic information was available on the label: species name, fishing gear, area of origin, and production method (caught or farmed). This research only looked if the information was available or not, we did not investigate its accuracy.

Our analysis showed that the labels of fresh and frozen seafood products include much more information than processed products. **The consumer information requirements of the CMO Regulation are generally well implemented for products under its scope, namely fresh and frozen products and smoked fish.** Even so, however, we identified three cases of non-compliance with the current requirements, all related to missing information on the fishing gear used.



In contrast, processed seafood products provide consumers with very little information:

- ◇ For 38% of processed products, it is impossible to know the species, the origin, or the fishing gear.
- ◇ Where any information is provided, it is usually incomplete: only 50% of processed products indicated the origin (catch area or production country), 45% of products indicated the scientific name, and 16% of fished products indicated the fishing gear used.

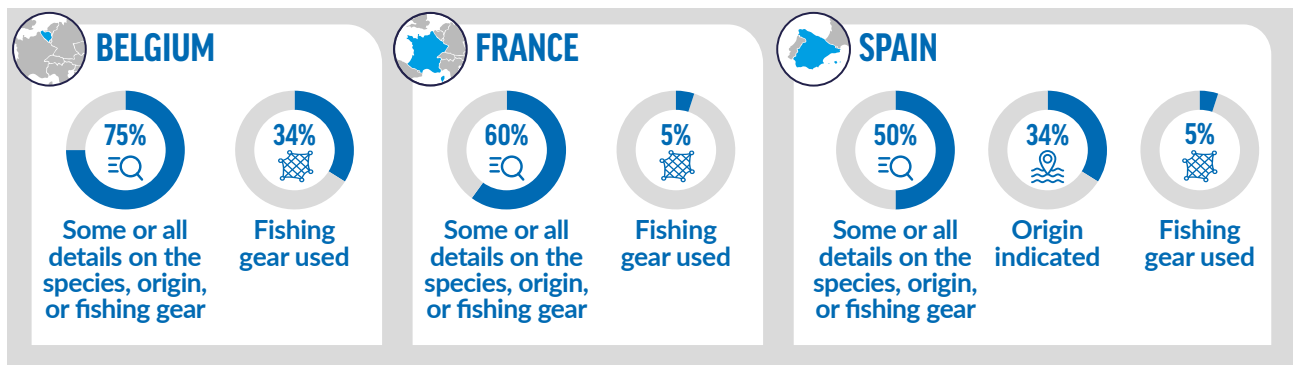


- ◇ 35% of processed products fail to specify the production method. This makes it difficult for consumers to differentiate between aquaculture and fishery products.

- ◇ 63% of products do not indicate the country of processing.²⁰

- ◇ Information was more complete in Belgium, followed by France and Spain:

- ◇ **Belgium:** Most processed seafood products voluntarily provided traceability information, with 75% listing some or all details on the species, origin, or fishing gear. Only 34% of products indicated the fishing gear used.
- ◇ **France:** 60% of processed products voluntarily provided some or all details on the species, origin, or fishing gear. Only 5% of processed items specified fishing gear used.
- ◇ **Spain:** 50% of the processed products on supermarket shelves voluntarily provided information on species, origin, or fishing gear. 34% of processed products indicated their origin, and only 5% stated the fishing gear used.



The seafood importing industry often argues that because processed products use seafood of different origins and species, it is costly and complicated to provide consumers with detailed information about what they are buying. However, our research contradicted this claim. We found that most processed seafood products have voluntarily included some key information on their labels. Across the three Member States, 16% of processed products provided information on the fishing gear, production method, area of origin, and species, showing that it is possible to do so even if products are processed.

Our analysis also identified several good practices in how some companies communicate traceability information on processed fishery and aquaculture products to their customers, for example with unique tracking codes, vessel names, or detailed information about fishing gear.



Why do we need to strengthen consumer information about seafood?

Understanding the origins and methods of production of the seafood we consume is crucial for making informed and sustainable choices. Various recent assessments have pointed to the need to provide EU consumers with better information about their seafood:

A 2023 European Commission evaluation of the CMO Regulation highlighted stakeholders' calls for mandatory consumer information on processed fishery and aquaculture products (under Article 35).²¹ Concerns were raised regarding the lack of criteria on sustainability, despite it being a core objective of the CMO.

A 2024 European Parliament resolution called for a comprehensive labelling system for all fishery and aquaculture products, with clear product origin identification.²² It also emphasised problems with using the FAO system of fishing areas, which does not indicate the origin clearly.

A 2024 study for the Fisheries Committee of the European Parliament recommended creating a label to identify EU seafood products, thereby enhancing consumer awareness on the origin, quality, and production conditions.²³ For imported fishery products, it suggested labelling them with the flag state (the flag under which the fishing vessel is registered), as this is an indicator of onboard working conditions and standards. The study also underscored that some EU imports come from fisheries that are overexploited or at high risk of IUU fishing.

A 2021 Eurobarometer poll indicated that two thirds of EU consumers value knowing the species in their seafood products.⁴ In addition, half of respondents considered information on the production method, origin, and catch/production area important; and one quarter of respondents found information on fishing gear to be useful. Information about fishing gear, especially when sufficiently precise, can inform consumers on environmental impacts such as seabed damage and bycatch risks of sensitive species such as turtles or cetaceans, or juvenile fish due to non-selective gears.



Enhancing transparency in the food service sector

Improvements in consumer information are also needed in the food service sector. A large-scale study of European mass caterers found that 26% of the seafood samples were mislabelled, with one third of establishments selling mislabelled seafood.²⁴ Moreover, more than one in five Europeans eat fishery and aquaculture products at restaurants and other food outlets at least once a month.⁴ Some Member States such as France²⁵ and Finland²⁶ already require the country of origin to be indicated for certain processed and non-processed meats in the food service sector.

Requiring this sector to provide this information to their customers would be a way to ensure a level-playing field as supermarkets, fishmongers and food stalls are required to provide this information.

Sustainability information for sustainable choices

In addition to displaying key information on species, origin, fishing gear, and production method, labels on seafood products should provide consumers with an indication of their sustainability: for instance, the status of fished stocks, the impact on the seabed, and the impact on protected species (such as dolphins and turtles). Without this information, consumers are unable to identify sustainable seafood options, particularly considering that many commonly sold seafood are associated with environmental damage. For example, a study by a French consumer association showed that 81% of the fishmongers in supermarkets sold seafood fished with unsustainable fishing practices or from depleted stocks.²⁷ Including this information on seafood products would allow to give value to local, high-quality and sustainable fishery and aquaculture products, such as from low-impact fisheries.

Recommendations

Oceana therefore urges the European Commission to revise Article 35 on consumer information in the CMO Regulation²⁸ to:

1 | Expand its scope to include prepared and preserved fishery and aquaculture products.

Basic information such as species, origin, fishing gear and production method should be required for all products.

2 | Require science-based sustainability information to be displayed on all fishery and aquaculture products.

There is currently no EU-wide requirement to provide sustainability information on these products, which makes it difficult for consumers to identify sustainable products based on clear and objective criteria.

3 | Expand its scope to include the food service sector.

Mass-caterers, hotels, and restaurants should be required to provide information on species, origin, fishing gear, production method to customers. Under EU law, the food service sector is currently exempt from consumer information requirements, needing only to provide information on allergens.



© OCEANA / Juan Cuetos

References

1 EUMOFA. (2023). *The EU Fish Market: 2023 Edition*. European Market Observatory for Fisheries and Aquaculture Products. Publications Office of the European Union.
https://eumofa.eu/documents/20124/35668/EFM2023_EN.pdf/95612366-79d2-a4d1-218b-8089c8e7508c?t=1699541180521

2 FranceAgriMer. (2023). *Étude des nouvelles tendances de consommation des produits aquatiques français en France métropolitaine dans un contexte post-Covid*. AND International.
https://www.franceagrimer.fr/content/download/71682/document/20230720_Etude_consommation_post_Covid_rapport.pdf

- 3 European Commission. (2021). *EU Consumer Habits Regarding Fishery and Aquaculture Products*. Special Eurobarometer 515 Report. European Union. <https://europa.eu/eurobarometer/api/deliverable/download/file?deliverableId=76466>
- 4 WWF. (2021, January 14). *Seafood traceability: exemptions risk fuelling illegal fishing*. <https://www.wwf.eu/?1909966/Seafood-traceability-exemptions-risk-fuelling-illegal-fishing>
- 5 Rabobank. (2022). *World Seafood Map 2022*. <https://research.rabobank.com/far/en/sectors/animal-protein/world-seafood-map-2022-seafood-trade-keeps-growing-from-strength-to-strength.html>
- 6 Tjoeng, M., Eikelenboom, S., & Tokmetzis, D. (2024, February 16). Russian fish & ships: Europe helps Kremlin make billions off its maritime catches. *Follow the Money*. <https://www.ftm.eu/articles/europe-transit-hub-for-russian-fish>
- 7 AIPCE-CEP. (September 2023). *Finfish Study 2023*. <https://www.aipce-cep.org/wp-content/uploads/2023/10/Final-draft-Finfish-Study-2023.pdf>
- 8 Source: Oceana elaboration of Eurostat-COMEXT
- 9 Onderzoek: dwangarbeid in Chinese visserij, producten ook in Nederlandse schappen. (2023, October 16). NOS. <https://nos.nl/artikel/2494310-onderzoek-dwangarbeid-in-chinese-visserij-producten-ook-in-nederlandse-schappen>
- 10 Four brands included in the Outlaw Ocean investigations were found in the supermarkets sampled for this analysis. Source: The Outlaw Ocean Project. (n.d.) *Discussion/Stakeholders*. <https://www.theoutlawocean.com/investigations/china-the-superpower-of-seafood/discussion/stakeholders/>
- 11 Planet Tracker. (2022, September 29). *Better traceability could boost global seafood profits by 60%, finds Planet Tracker*. <https://planet-tracker.org/better-traceability-could-boost-global-seafood-profits-by-60-finds-planet-tracker/>
- 12 Oceana. (August 2024). *Follow the Fish statement*. <https://europe.oceana.org/wp-content/uploads/sites/26/2024/08/STATEMENT-FOLLOW-THE-FISH-AUGUST-2024-ENGLISH.pdf>
- 13 Regulation 1379/2013. *Regulation (EU) No 1379/2013 of the European Parliament and of the Council of 11 December 2013 on the common organisation of the markets in fishery and aquaculture products*. <http://data.europa.eu/eli/reg/2013/1379/oj>
- 14 Regulation 1169/2011. *Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers*. <http://data.europa.eu/eli/reg/2011/1169/oj>
- 15 The Food and Agriculture Organisation divides the world's oceans and inland waters into 27 major fishing areas.
- 16 Annex III of the CMO Regulation lists the following categories of fishing gear: Seines, trawls, gillnets and similar nets, surrounding nets and lift nets, hooks and lines, dredges, pots and traps.
- 17 The products referred to in points (h) and (i) (CN codes 1604 and 1605) which are prepared or preserved fish, crustaceans, molluscs and other aquatic invertebrates, and caviar.
- 18 In this analysis, the fishery and aquaculture products under the “fresh/frozen” category are the products referred to in points (a), (b) and (c) of Annex I of the CMO Regulation. Products under the “processed” category are the products referred to in points (h) and (i) (CN codes 1604 and 1605) which are prepared or preserved fish, crustaceans, molluscs and other aquatic invertebrates, and caviar.
- 19 Various species of tuna, bonito, mackerel, cod, Alaska pollock, mussels, cockles, clams, sardines, crabs, salmon, halibut, hake, squid, octopus, shrimps, anchovy, eel, herring, trout, blue whiting, lobster, scallops, prawn, plaice, saithe, haddock, sole, and sprat were included. A variety of fresh/frozen products (chilled, precooked, frozen, smoked) and a variety of processed products (tinned, surimi, caviar, seafood salad, nuggets, sticks, lumpfish roe) were included.
- 20 It is voluntary for operators to provide information on production techniques and practices (Article 39 of the CMO Regulation).
- 21 European Commission. (2023). *Report from the European Commission to the European Parliament and the Council - Implementation of Regulation (EU) No 1379/2013 on the common organisation of the markets in fishery and aquaculture products*.
- 22 European Parliament. (2024). *European Parliament resolution of 18 January 2024 on the implementation of the Common Market Organisation (CMO) Regulation in fisheries and aquaculture - Regulation (EU) 1379/2013*.
- 23 Aranda, M., Oanta, G., Le Gallic, B., Sobrino-Heredia, J.M., Arantzamendi, L., Andrés, M., Iriondo, A., & Gabiña, G. (2024). *Research for PECH Committee - Policy options for strengthening the competitiveness of the EU fisheries and aquaculture sector*. European Parliament, Policy Department for Structural and Cohesion Policies. [https://www.europarl.europa.eu/thinktank/en/document/IPOL_STU\(2024\)747292](https://www.europarl.europa.eu/thinktank/en/document/IPOL_STU(2024)747292)

- 24 Pardo, M.A., Jiménez, E., Viðarsson, J.R., Ólafsson, K., Ólafsdóttir, G., Danielsdóttir, A.K., & Pérez-Villareal, B. (2018). DNA barcoding revealing mislabelling of seafood in European mass caterings. *Food Control*, 92, 7-16.
<https://doi.org/10.1016/j.foodcont.2018.04.044>
- 25 In France, the food service sector must display information on the country of origin of all meats for meat dishes as a basic ingredient or meat preparation. Source: Décret n° 2024-171 du 4 mars 2024 relatif à l'indication de l'origine des viandes utilisées en tant qu'ingrédients dans des préparations de viandes et des produits à base de viande applicable aux établissements de restauration.
- 26 In Finland, the food service sector must indicate the country of origin for certain types of fresh, chilled, or frozen meat. Source: Ministry of Agriculture and Forestry Decree 154/2019 on providing food information to consumers.
- 27 UFC-Que Choisir. (2020). *La pêche durable reste à quai! Enquête sur la durabilité de la saisonnalité, des méthodes et des zones de pêche pour 8 poissons frais et pour le poissons surgelé.*
<https://www.quechoisir.org/action-ufc-que-choisir-la-peche-durable-reste-a-quai-onveutplusduchallut-n83139/?dl=63363>
- 28 A revision of the CMO Regulation can be undertaken separately, without carrying out a reform of the entire EU Common Fisheries Policy (CFP). The CMO Regulation has been amended three times in the framework of the current 2013 CFP.

Suggested citation: Oceana. (2024). Fishy labels: What do we know about the seafood we buy in supermarkets? Case studies of Belgium, France, and Spain. 8 pp.

Design: Yago Yuste.

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor CINEA can be held responsible for them.



OCEANA Protecting the World's Oceans

OCEANA IN EUROPE

European Headquarters:
Madrid, Spain
europe@oceana.org

European Union Office:
Brussels, Belgium
brussels@oceana.org

Baltic and North Sea Office:
Copenhagen, Denmark
copenhagen@oceana.org

europe.oceana.org



© OCEANA / Kerth Ellenbogen