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# Seafood Traceability New Legal Framework Webinar



03 April 2025



10:30 – 12:00 h CET





## Seafood Traceability New Legal Framework Webinar



Anne **Gautrais - Le Goff**,  
Policy Officer, DG MARE

Traceability of seafood products in the  
EU: **What changes in 2026 and 2029**

# Our Experts



## Seafood Traceability New Legal Framework Webinar



Gisela **Costa**,  
PhD Fellow, Universidade de Aveiro

Views on incentives and barriers  
towards **effective governance in  
seafood traceability**



## Seafood Traceability New Legal Framework Webinar



Stefan **Meyer**,  
General Manager, The German Association of Fish  
Processing and Wholesale

Labelling of seafood traceability  
information on processed fisheries  
products – **Practical experiences from  
the German market**



## Seafood Traceability New Legal Framework Webinar



José **Bento**,  
Business Development,  
Soguima, Portugal

Small-Scale Fisheries and **the  
upcoming traceability challenge:**  
the view of a fisherman

# Our Experts



# Traceability of seafood products: What changes in 2026 and 2029?

*Sea2Sea Project*

Webinar, 3 April 2025

*Anne Gautrais-Le Goff*

*DG MARE -Unit D4*

*“Fisheries control and inspections”*

# Revision of the EU Fisheries Control System

Initial proposal by the Commission COM (2018)368 amending Regulation 1224/2009 (30 May 2018)

**5 years** negotiation ( December 2023) : Regulation EU 2023/2842

[Regulation - EU - 2023/2842 - EN - EUR-Lex \(europa.eu\)](#)

**Entry into force ► 9 January 2024**

Different dates of application for different provisions

**Traceability provisions;**

- **10 January 2026**
- **10 January 2029**



# 2026 - Composition of lot of FAPs – New Article 56a

What are the new rules?

Which FAPs?

When do they apply ?

- ❖ **Simpler** definition of “lot” *means a batch of units of fishery or aquaculture products* - Article 4 point(20)-
- ❖ All FAPs to be put into **lot** prior to placing on the market
- ❖ Rules on **what constitutes a lot of Chapter 3** -fresh and frozen FAPs
- ❖ **2 derogations** for lot of Chapter 3 prior to placing on the market ;
  - ❖ If Total species ≤ 30kg : mix several species from the same catching vessel in one lot
  - ❖ If BMCS species: mix possible but from for non- human consumption
- ❖ Mixing of lots of chapter 3 authorized after placing on the market **ONLY** if traceability info of Article 58(5) + information **on composition** of the **newly** created lot & **quantities** of each lot forming it, is available
- ❖ Application: **2 years** after entry into force- **10 January 2026**

# 2026 and 2029-Traceability of lots of FAPs- Article 58

What are the new rules?

- ❖ Operators must **record** and **make available** traceability information in a **digital way** to the next operator in the supply chain.  
**All stages** of production , processing and distribution from “catching to harvesting to retail stage”

Which products? **ALL**  
When ?

- ❖ For **fresh and frozen** FAPs (including imported products: **10 JAN 2026**
- ❖ For **prepared and preserved** FAPs (including imported products), following feasibility study by COM – **10 JAN 2029**
- ❖ For **Algae**: **10 JAN 2029**

# 2026 - Lot of **fresh&frozen** FAPs – Minimum traceability information

Which  
traceability  
information for  
**fresh and  
frozen** FAPs?

Article 58 (5)

- ❖ Lot identification number
- ❖ **Unique fishing trip identification number**
- ❖ FAO alpha code of the species and scientific name
- ❖ Geographical area(s) of catch / production area(s),
- ❖ **Fishing gear**, date(s) catches/ date(s) of harvest & Quantities in Kg net weight or number of individuals
- ❖ **Clear requirements for imported products:** IMO number and catch certificate number(s) (IUU regulation)
- ❖ **Clear requirement for aquaculture products:** number of aquaculture production unit

# What's next for traceability of lots of FAPs?

Short term  
Q4 2025

Review existing COM implementing act (CIR 404/2011) in particular Articles 66 and 67 - and adopt additional detailed rules as necessary for **fresh and frozen FAPs**  
Article 58 (12)

Medium term  
Q4 2026

Launch a study on feasible traceability systems and procedures , including digital and minimum traceability information for lots of **prepared and preserved FAPs**  
Article 58 (9)

Long term  
( By 2028  
to apply by  
January  
2029)

Set minimum traceability information and systems for lots of **preserved and prepared FAPs** - Article 58 (10)  
Set Minimum traceability requirements for lots of **Algae**- Article 58 (11)



# 2029- Traceability information of “processed” FAPs and Algae



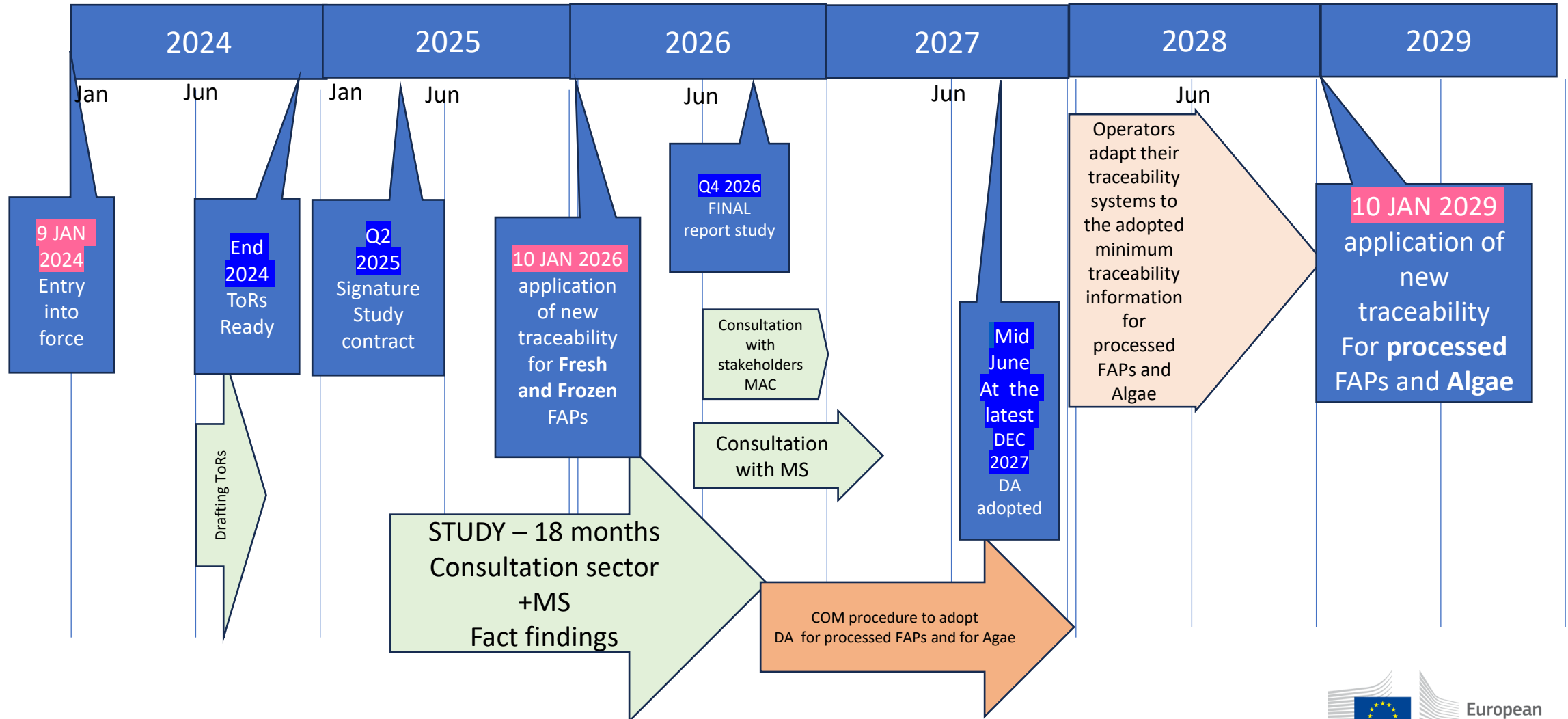
## A pre-requisite

- ❖ “The Commission shall conduct a study on *feasible traceability systems and procedures*, including *minimum* traceability information, for fishery and aquaculture products falling under headings **1604 and 1605 of Chapter 16** of the Combined Nomenclature, with a view to defining detailed rules for such products. The study shall include an analysis of *available digital solutions or methods* which meet the requirements on traceability in this Regulation, while taking into account the *impact on small operators*.”

## Delegated Act (DA)

- ❖ DA on the traceability requirements for lots of Chapter 16, subheading 1604 & 1605 FAPs, including the use of digital systems on the basis of the results of a feasibility study
- ❖ DA on the traceability requirements for lots of Chapter 12 – subheading 1212 21 “Seaweed/algae”

# Timeline: 2024 – 2029



# Thank you very much for attention !

[Regulation - EU - 2023/2842 - EN - EUR-Lex \(europa.eu\)](#)



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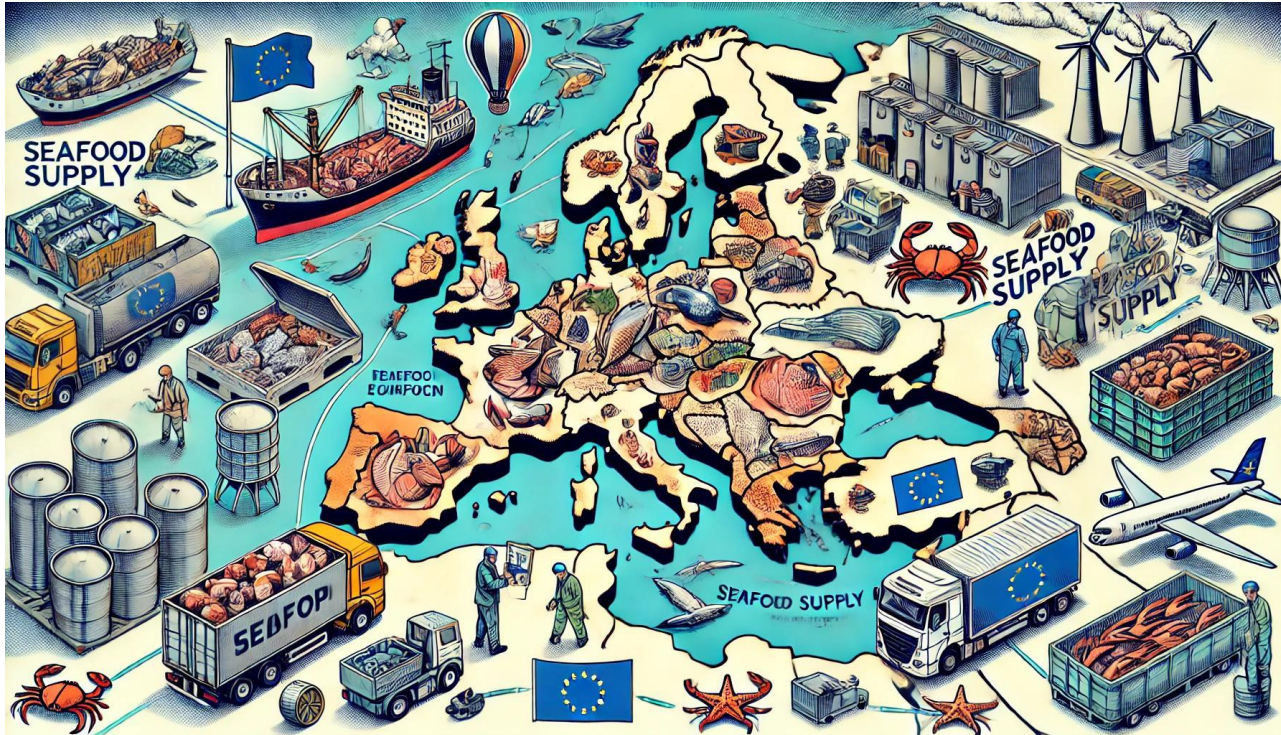
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# Labelling of seafood traceability information on processed fisheries products – *Practical experiences from the German market*

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# Seafood market in the EU in 2023



## EU market:

- Total market supply in the EU in 2023 was 12,473 thousand tons.
- Per capita consumption in 2023 was 23.0 kg.
- Export-corrected import dependency 82.9%

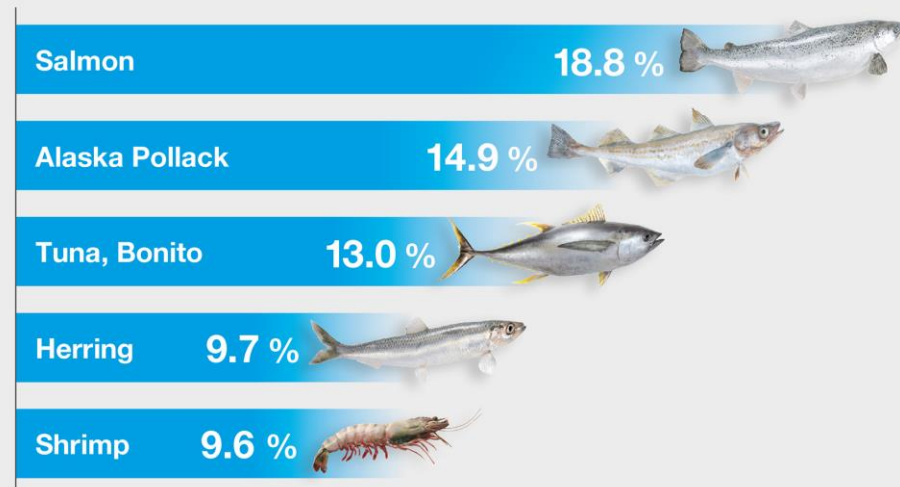
## German market:

- Supply 1,952 thousand tons (16 % of EU total)
- Per capita consumption in 2023 was 12.5 kg
- Average consumer price: 12,13 €/kg product weight

# German seafood market overview

## Fish market favourites in Germany

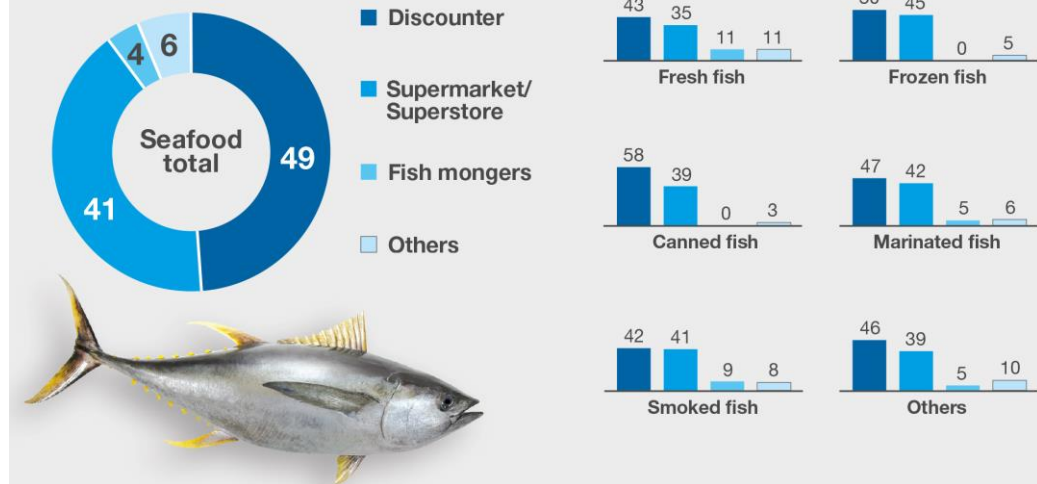
Share in the consumption of fish, crustaceans and molluscs in 2023



Source: FIZ, Status 2024

## Points of sale for seafood in Germany

Percentages in 2023



Source: GfK Panel Services, published by FIZ, 2024





























# Consumer expectations on labelling

Special Eurobarometer 558

**EU consumer habits regarding fishery and aquaculture products**

September October 2024

QB10. Which of the following information do you think should be mentioned on the label of tinned or prepared products? (MULTIPLE ANSWERS POSSIBLE) (%)

	EU27	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
																												
The species that the product contains	58	63	53	52	60	59	62	73	63	62	57	79	64	46	59	51	50	64	62	63	67	71	44	49	40	81	60	68
Whether the product used is wild or farmed	50	50	41	32	51	40	52	54	37	66	43	56	59	46	41	50	53	40	51	42	62	61	30	42	39	78	51	50
The area of catch or production	47	46	38	38	42	50	49	45	42	67	44	65	49	47	50	44	49	42	49	40	47	48	37	42	31	82	54	48
Where the plant that processed the product is located	42	40	32	40	37	46	47	41	30	44	32	54	50	40	42	39	38	32	37	46	43	39	37	31	40	59	39	46
The environmental impact	29	36	32	12	25	16	29	41	13	28	27	36	39	19	22	34	24	12	47	13	32	46	21	21	15	64	26	17
The fishing gear (e.g. longlines, trawls) used to catch the product	23	38	14	13	29	19	29	26	5	32	22	23	23	14	21	20	22	9	31	9	22	21	19	12	16	37	13	11
Don't know	2	2	1	4	2	2	1	2	2	1	2	2	2	2	0	2	1	2	1	3	1	2	2	2	1	0	1	1

1st Most Frequently Mentioned Item

2nd Most Frequently Mentioned Item

3rd Most Frequently Mentioned Item

Sept/Oct 2024



- 

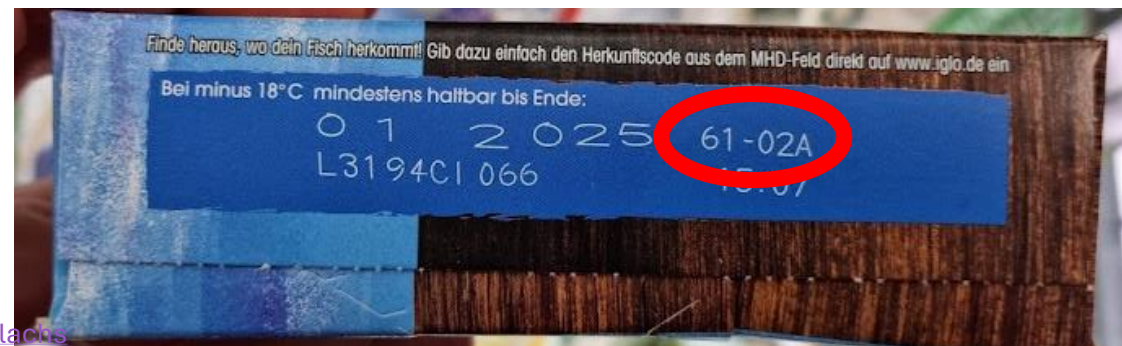
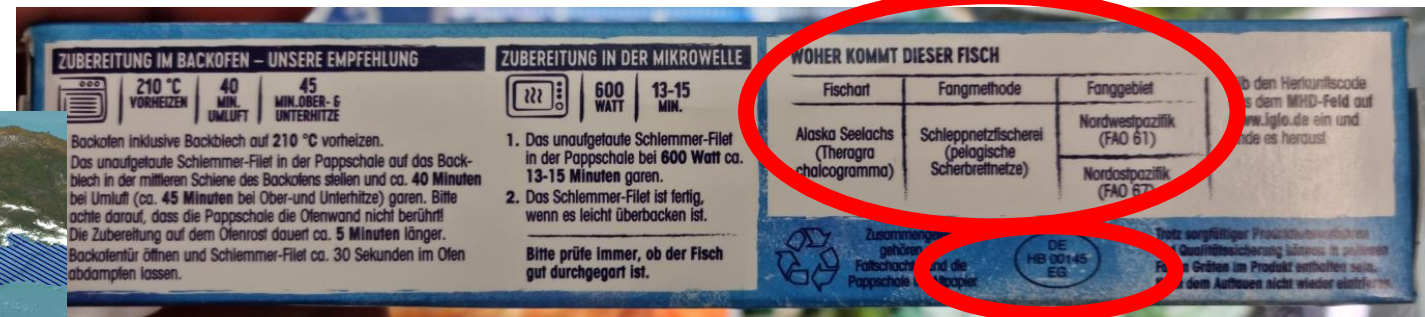
**\*\*1604&1605: prepared and preserved FAPs**

# Labelling requirements ... and realities

- Since 2008 voluntary labelling of catch area and species on all products
- Result of a bottom-up agreement between producers, retail and NGOs
- Additional: private certification labels have a high coverage since around 2012
  - **MSC/ASC** in 2022: 64%
    - Frozen: 82%
    - Fresh packed: 47%
    - Canned: 58%
  - Other labels, eg GGN, high coverage in some categories

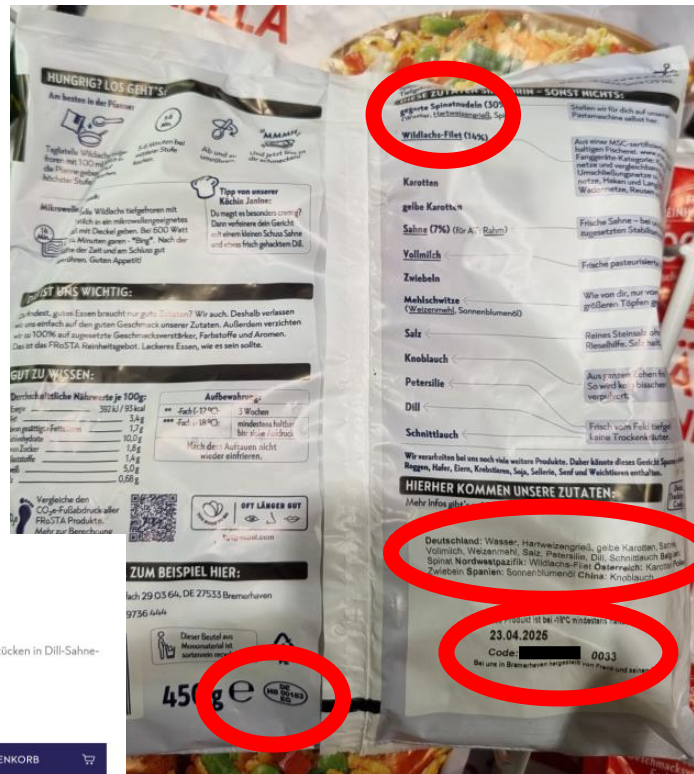


# Labelling realities: frozen




# Labelling realities: canned






- Name of the fish species
- Capture area
- Fishing gear
- Certified fisheries label
- Production facility
- Name of the production shift leader in charge
- Country of origin of every single ingredient
- CO<sub>2</sub>e
- Price
- Recipes



[Gerichte](#)
[Fisch](#)
[Gemüse](#)
[Vegan](#)
[Bio](#)
[Obst](#)
[Kräuter](#)
[Merchandise](#)



## Tagliatelle Wildlachs

Spinatnudeln mit zarten Wildlachs-Filetstücken in Dill-Sahne-Sauce (29%). Tiefgefroren.

**4,79 €**

450 g (10,64 € / kg)

- +

IN DEN WARENKORB

VOR ORT KAUFEN


BEI ANDEREN ONLINE-HÄNDLERN KAUFEN

● Lieferzeit 1-3 Werktage

CO<sub>2</sub>e Fußabdruck

ca. **252 g**

CO<sub>2</sub>e / 100g



ZUBEREITUNGSZEIT

ca. **6 min**

PACKUNGSGRÖSSE

**450 g**

© FRoSTA AG, <https://www.frosta.de/produkte/schnelle-gerichte/tagliatelle-wildlachs-in-dill-sahne-sauce/>

# Labelling of seafood products

## Consumer Information



CURRENT: 1224/2009, Art. 58: Traceability ends at the retail stage, i.e. before delivery to the final consumer.  
PERSPECTIVE: Passing on lot information to end consumers.

## HORECA-Sector



CURRENT: 1379/2013, Art. 35: Processed products are exempt from the disclosure of mandatory information.  
PERSPECTIVE: Proposal to include all products (including processed) in Art. 35

# Traceability at a crossroads

- Traceability for processed products is a reality for 17 years in Germany!
- Awareness for “asking the right questions” to the product is same-same to other EU MS
- Other preparations of products and POS did not follow the voluntary scheme. Why? You cannot force it!
- Change to CMO and regulation **MUST NOT** remove possibilities to differentiate brands and products!
- Otherwise “sustainability” will lose relevance.



# Seafood traceability today!

Dr. Stefan Meyer

Bundesverband der deutschen Fischindustrie  
und des Fischgroßhandels e.V.

[smeyer@fischverband.de](mailto:smeyer@fischverband.de)

SEAFOOD TRACEABILITY NEW LEGAL  
FRAMEWORK WEBINAR

03.04.2025



Graphic elements created with the kind support of ChatGPT



# Views on incentives and barriers towards effective governance in seafood traceability



Gisela Costa, Cristina Pita



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# The Sea2See Project

Development of an end-to-end **blockchain** tool and applications to increase trust and social acceptance of sustainably fished and farmed seafood.

**WP1** (From bottlenecks to strategy building for the seafood value chain stakeholders)

## Identify incentives & barriers to traceability in Fisheries and Aquaculture:

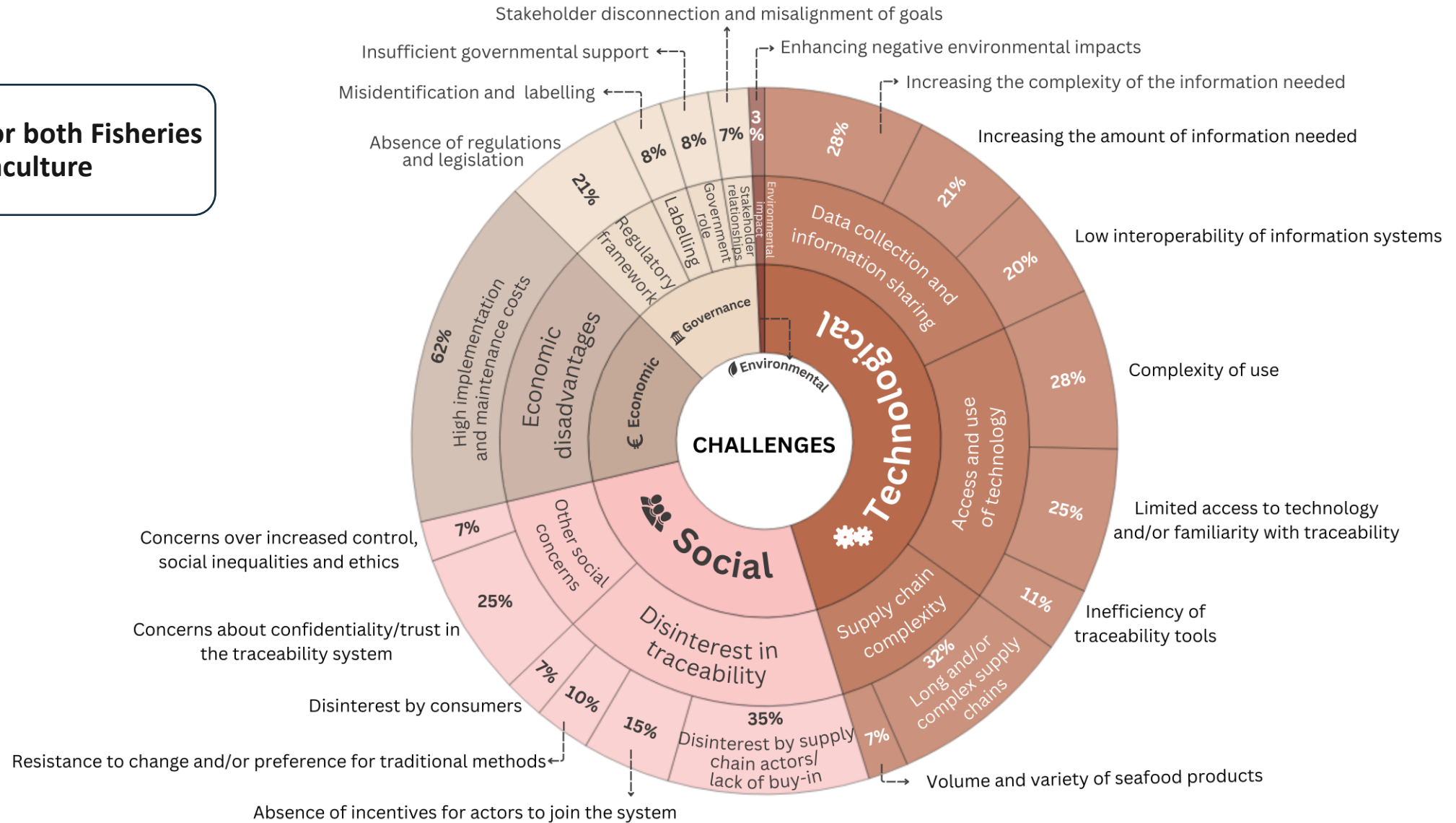
1. Systematic review of the literature
2. Interviews
3. In-depth analysis of demonstration sites

### Demonstration sites:

- **Aquacultures:** Gilthead seabream and European seabass (Greece), Meagre (Portugal) and Rainbow Trout (Spain)
- **Fishery:** Algarve Octopus SSF (Portugal)
- **Imports:** Canned Tuna (Ecuador and Peru)

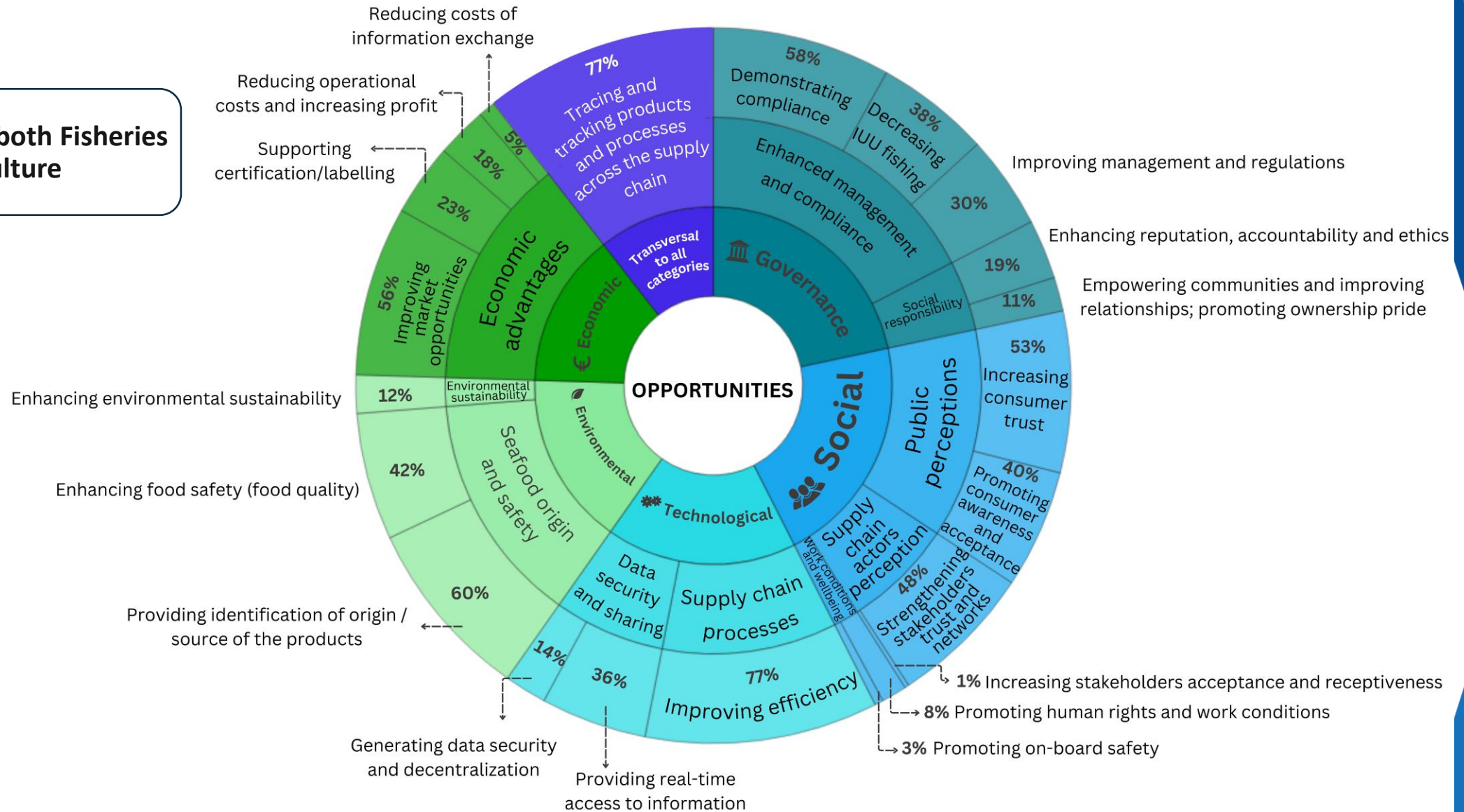
# Literature review

## Results for both Fisheries and Aquaculture



# Literature review

## Results for both Fisheries and Aquaculture



# Interviews with experts



42 interviews



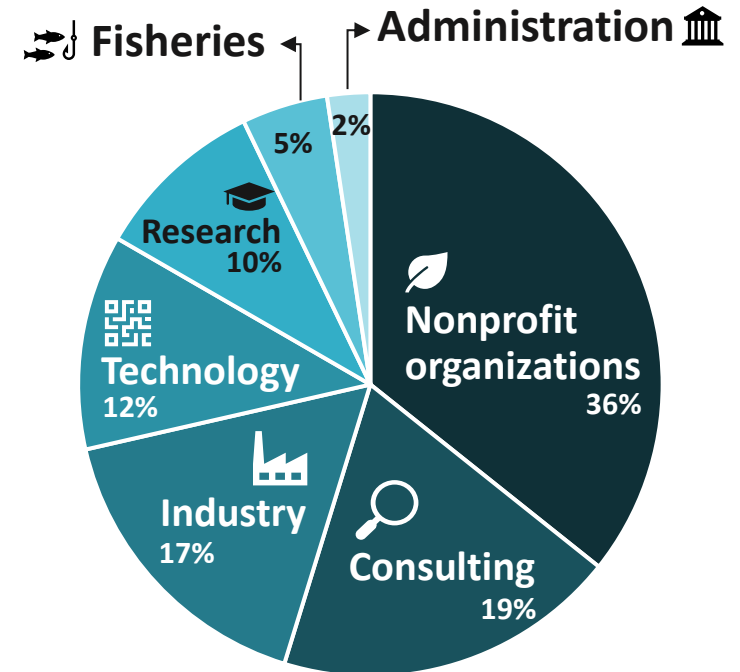
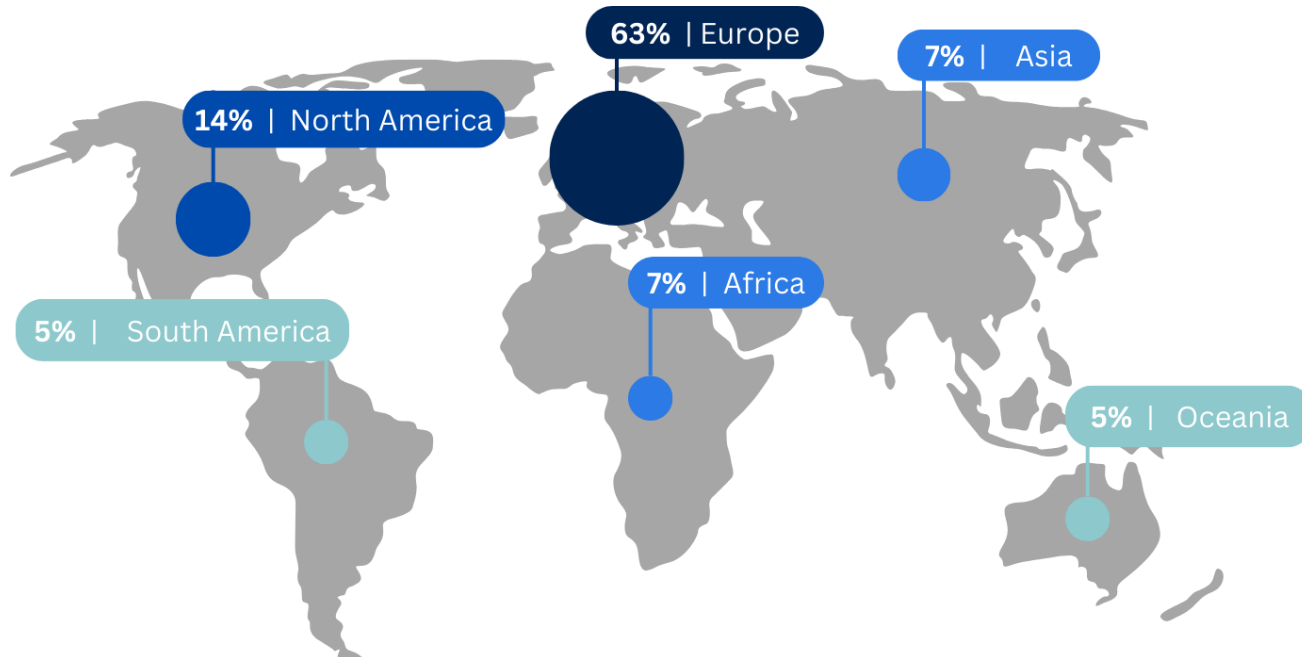
17.9 years of experience working with seafood



10.5 years of experience with traceability

71% w/ direct contact

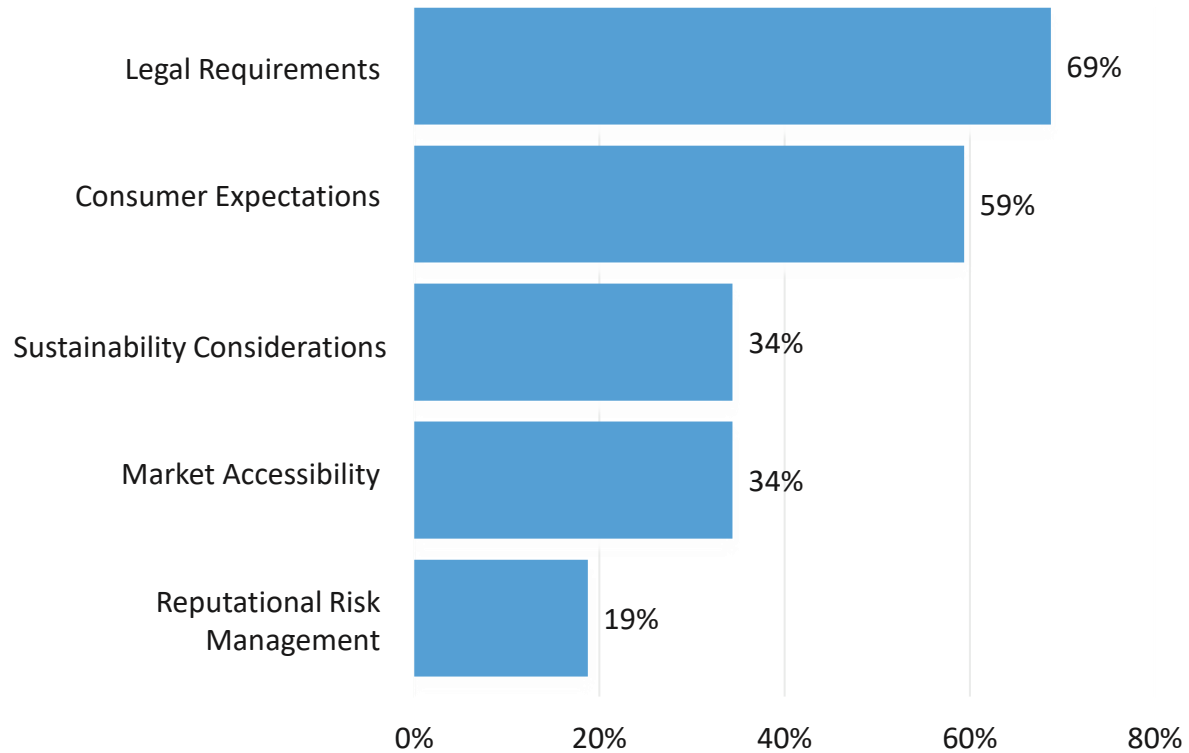
29% w/ indirect contact



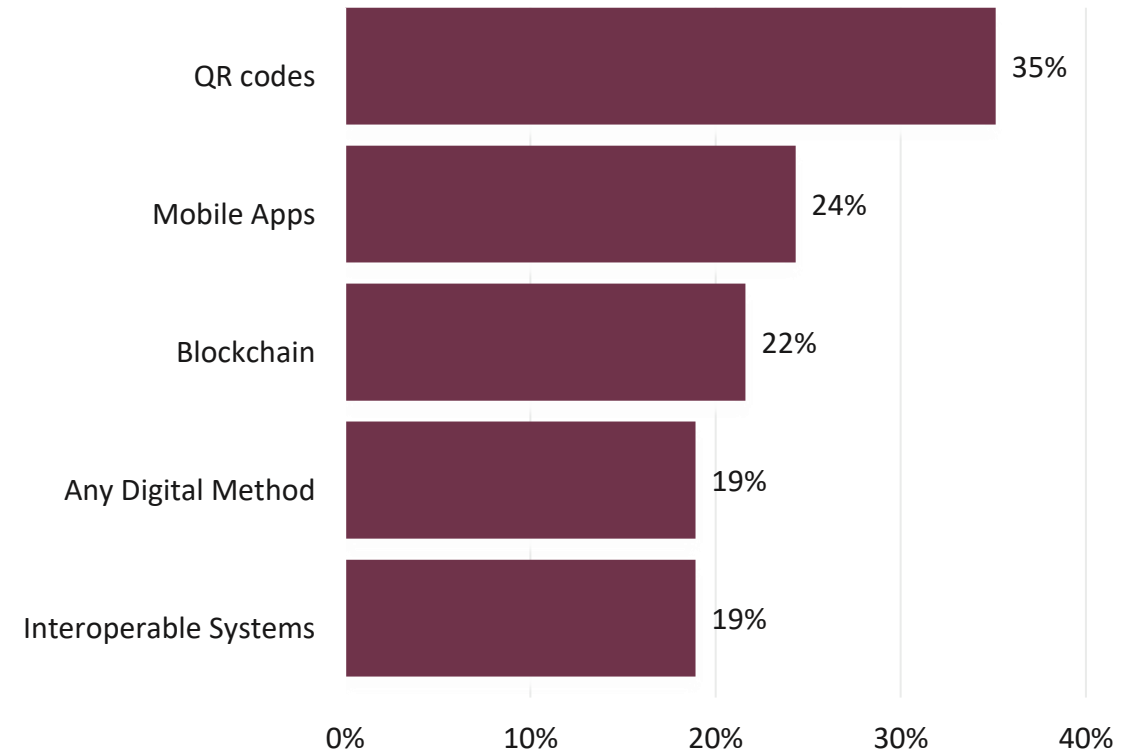
# Interviews with experts

## PRELIMINARY RESULTS

**TOP 5**  
Traceability Drivers (fisheries)



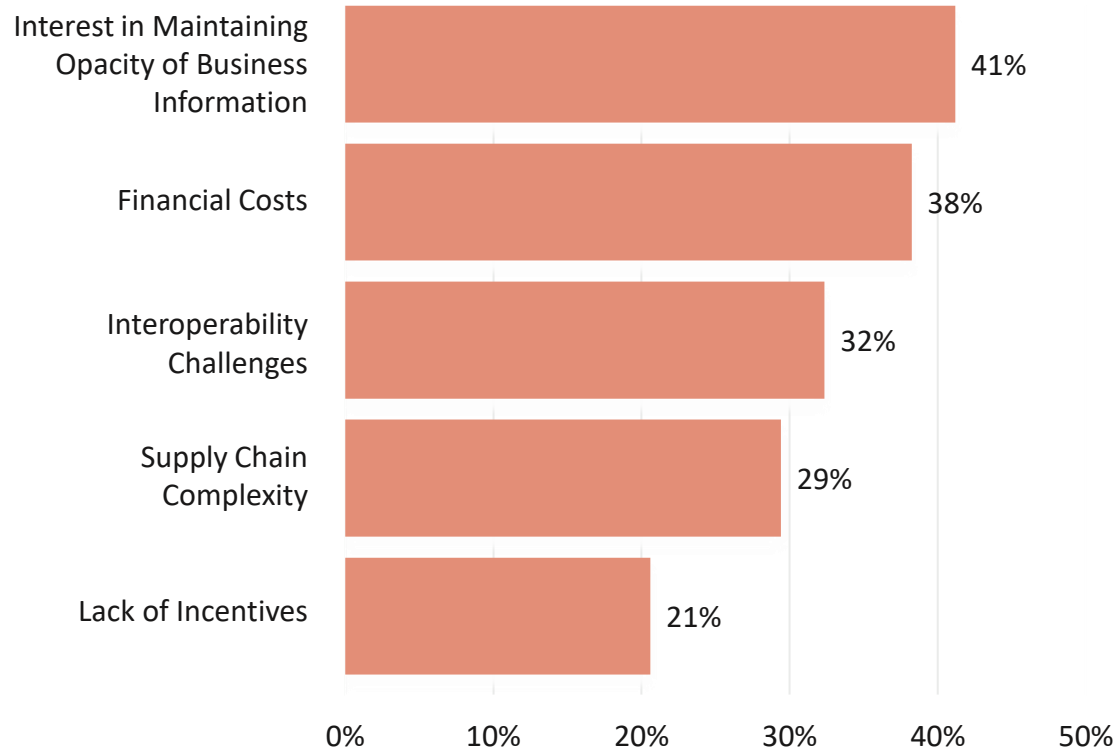
**TOP 5**  
Preferable Methods/Technologies (fisheries)



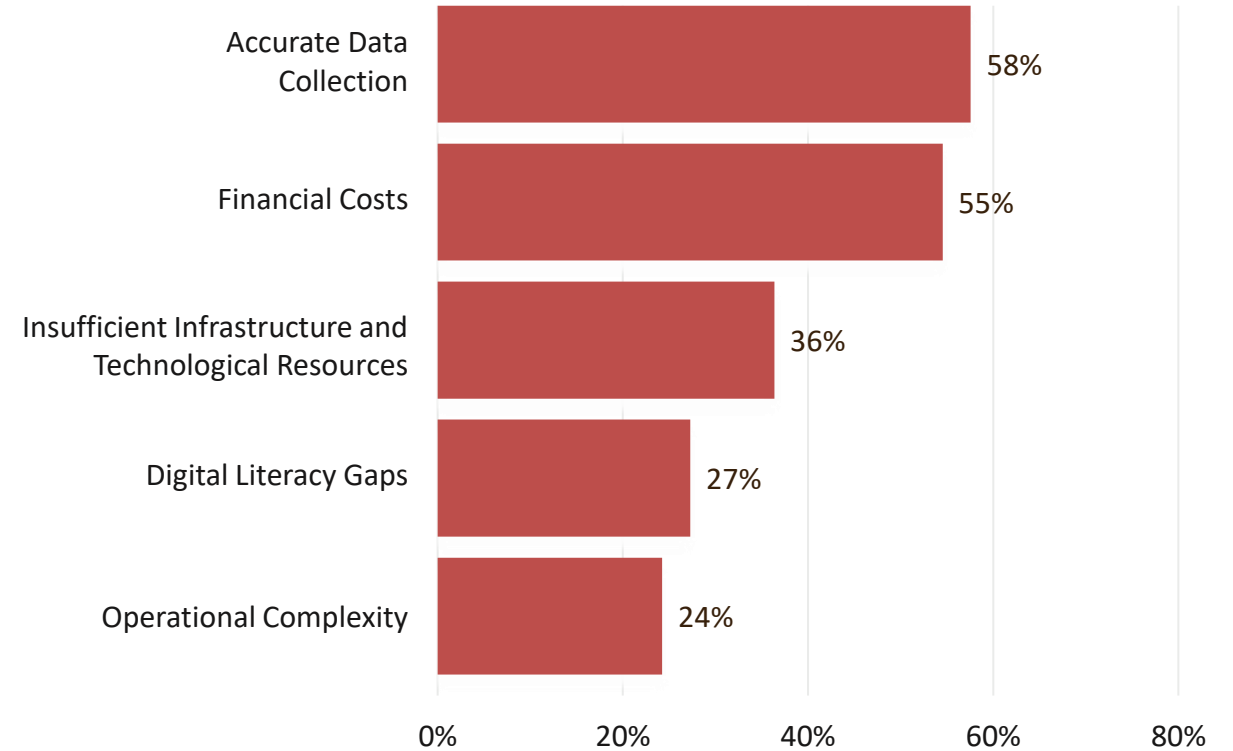
# Interviews with experts

## PRELIMINARY RESULTS

### TOP 5 Traceability Challenges (fisheries)



### TOP 5 Traceability Challenges (SSF)



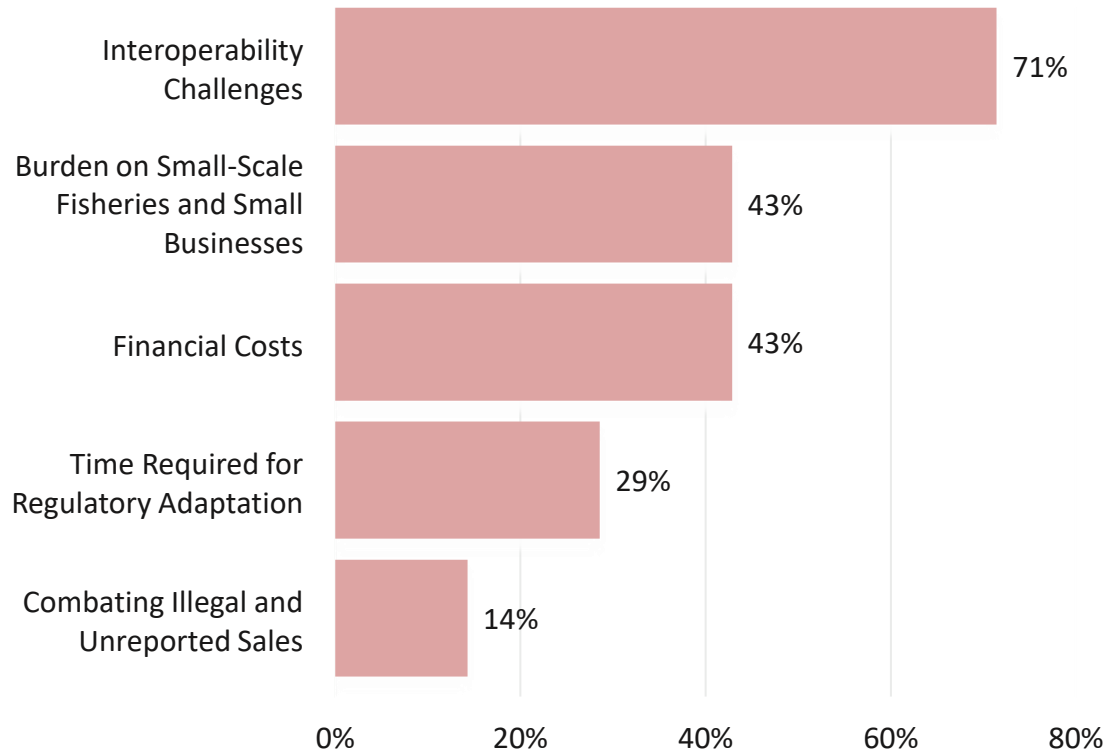
# Interviews with experts

## PRELIMINARY RESULTS



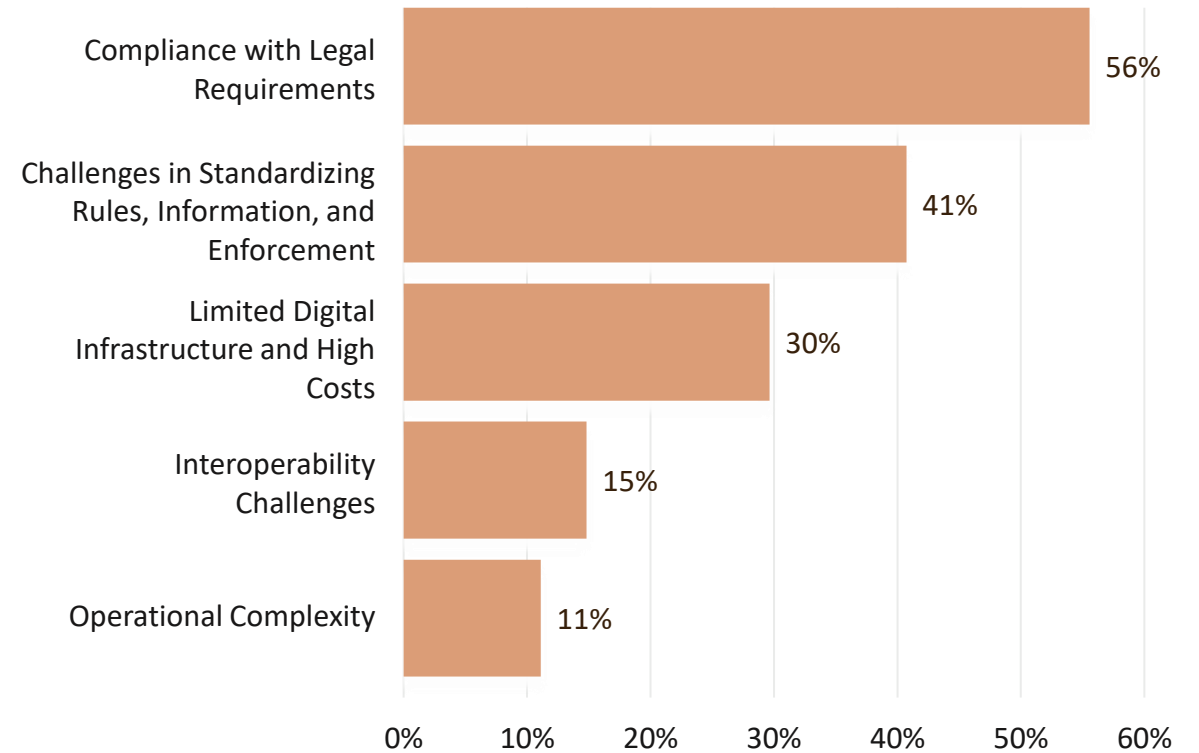
### TOP 5

#### Challenges of the New EU Regulation (fisheries)



### TOP 5

#### Challenges of Entering the EU Market (fisheries)

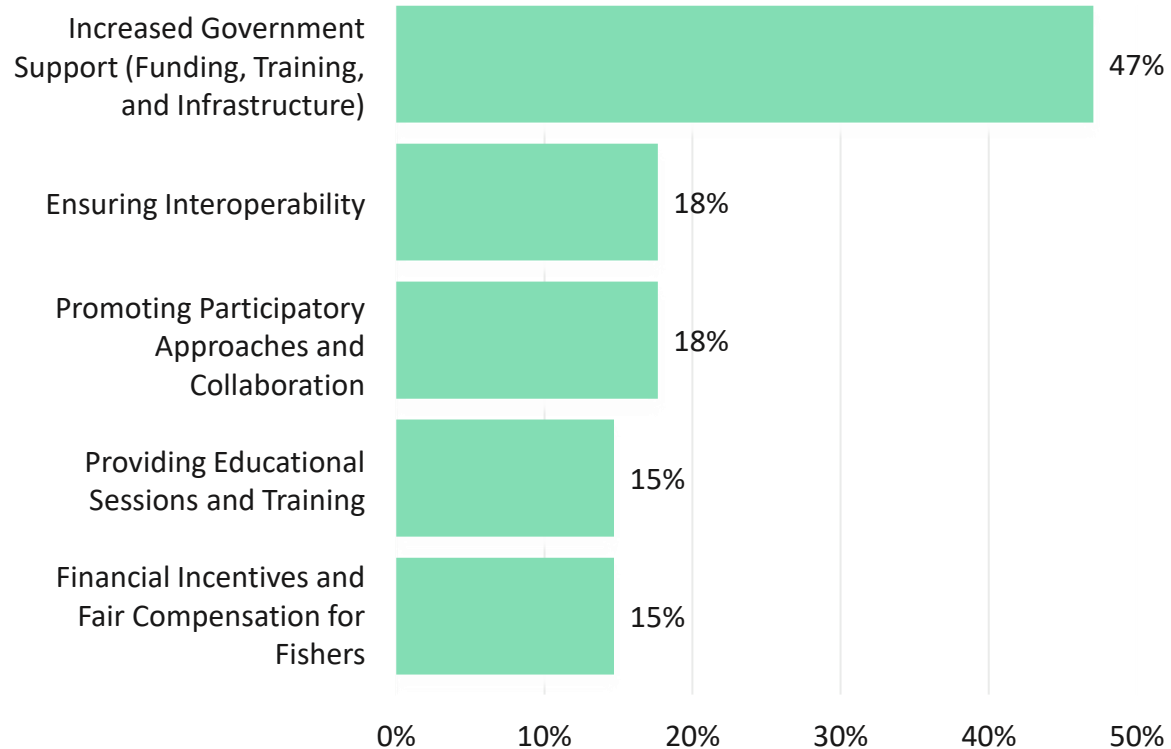


# Interviews with experts

## PRELIMINARY RESULTS

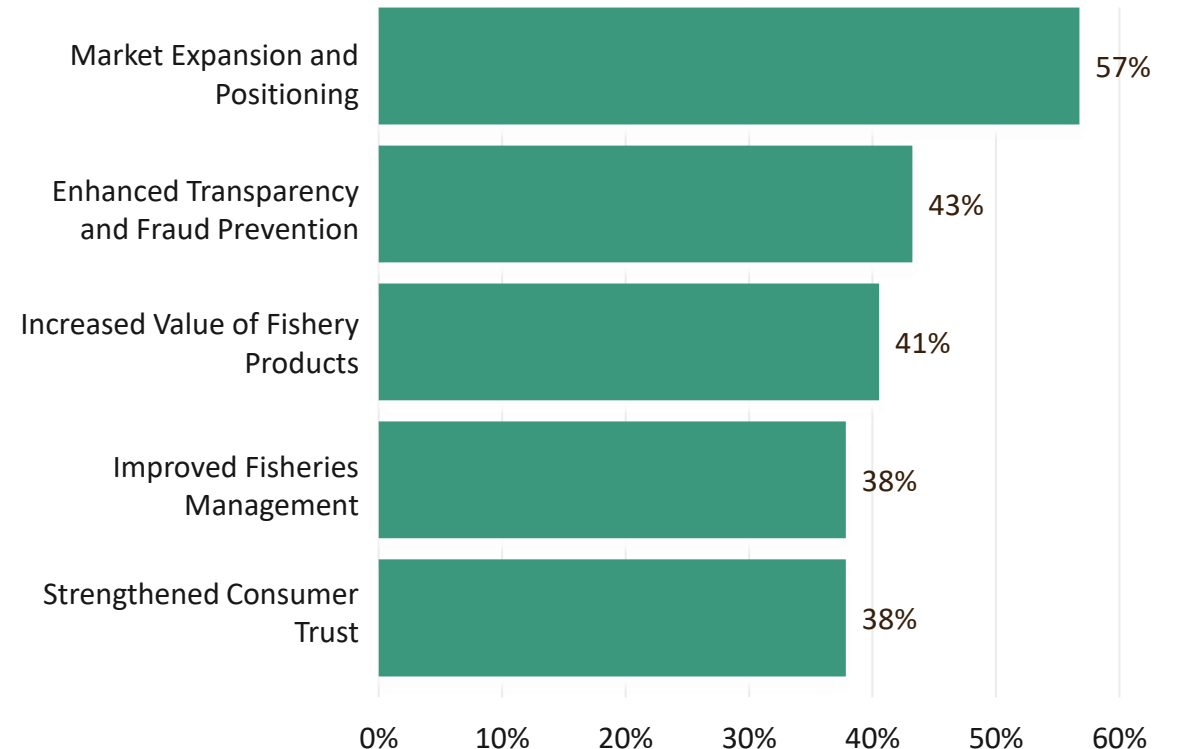
### TOP 5

#### 💡 Ways to Overcome Main Challenges (fisheries)



### TOP 5

#### 📈 Traceability Opportunities (fisheries)



# Thank you!

Contacts: [gsc@ua.pt](mailto:gsc@ua.pt) | [giselascosta@gmail.com](mailto:giselascosta@gmail.com)  
[c.pita@ua.pt](mailto:c.pita@ua.pt) | [cpita@iim.csic.es](mailto:cpita@iim.csic.es)



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