SIGNED LETTER

SUSTAINABLE FISH & SEAFOOD IN THE EU

Sustainable fish and seafood in the EU

For years, the EU, the fishing and processing sector and retailers have been working together to improve the sustainability of fish and seafood on the European market. The EU fisheries Control Regulation is currently being negotiated between the European Commission, Council of the EU and the European Parliament. All parties involved are encouraged to ensure sustainable fisheries management and sustainable fish of the highest quality in the EU, the world's largest market for fish and seafood, as soon as possible.

In recent years, the outlook for fish and fisheries in the North-East Atlantic and North Sea has been largely positive. Many commercially important fish stocks recovered, while overfishing in the region declined. This positive trend is going into reverse at the moment. Overfishing of individual fish stocks in this area is on the rise again. The sometimes considerable bycatch of sensitive and endangered species threatens the biodiversity and health of marine ecosystems. In order not to further risk the hard-won successes of the past years, the course must now be set for reliable sustainability.

We, the undersigned companies, are committed to a progressive EU fisheries Control Regulation, which can serve as a key pillar of the EU's Common Fisheries Policy. For this reason, we wish to emphasise that it will continue to be crucial that the EU Member States and the EU institutions as well as industry work towards the adoption of rules and measures that further improve both the environmental and social aspects of fisheries. This applies to a large extent to the avoidance of fish from illegal, unreported and unregulated (IUU) fishing. In our view, two aspects in particular are crucial: ensuring the legality of fishing activities at sea, and ensuring the legality of all fish and seafood products entering the supply chain, whether fresh or processed. The revision of the EU fisheries control system is a unique opportunity to establish a robust system of control and traceability of fish and seafood on the EU market. Traceability along the seafood supply chain is necessary to combat IUU fishing and achieve healthy fisheries and aquaculture, both in the European Union and beyond. Seafood traceability is also key to increasing consumer confidence in the sustainability, quality and legality of our products and avoiding fraudulent and / or mislabelled products in seafood supply chains.

Ensuring legality at sea

As it stands, the control and implementation of the European fisheries policy in general, and in particular the EU landing obligation, continues to be insufficient across the board, meaning that there is a high risk of illegal fish and seafood in the supply chain.

An obligation for comprehensive at-sea controls would go a long way to eliminating this risk - guaranteeing our customers access to healthy fish stocks, a profitable and robust industry and improved food security. However, if the obligation to land all catches continues to be poorly implemented, several problems will continue to arise. Not only will the quality of scientific stock assessments be reduced, making overfishing more likely, but poor implementation significantly increases the risk for illegality at sea and makes it more difficult for retailers and processors to ensure that seafood sold within our product ranges are sourced legally from the healthiest stocks possible.

This is why EU fish retailers and the processing industry believe:

- The effective implementation of fisheries control rules, including the landing obligation, is essential to ensure the biological and economic sustainability of European fisheries – including certified ones – in the future.
- Full documentation of fisheries is an indispensable tool for successful fisheries management, healthy fish stocks and marine ecosystems.
- The obligation to properly document and fully account for catches should not be undermined by limiting effective control to a few large fishing vessels.
- For more transparency, EU Member States should report publicly on their national fisheries control programmes on an annual basis and be able to restrict the disclosure of information by the European Commission only if there is a reasoned refusal.

We therefore call for comprehensive and cost-effective monitoring and enforcement of control measures with the help of mandatory remote electronic monitoring (including cameras) on EU catching vessels above 12 meters, as well as for those below 12 metres at risk of non-compliance with the Common Fisheries Policy, with the aim to monitor illegal discards and the bycatch of sensitive species.

Ensuring legality in the supply chain

Effective traceability underpins the sustainability of fisheries products by creating transparency and accountability within the supply chain. The EU is the world's largest seafood market for fish and seafood and has to import more than 60% to meet EU citizens' annual demand. A traceability approach mandated by the EU will promote transparency and sustainability of seafood not only within the EU but also in the global fisheries sector. Seafood supply chains are often complex as products are sourced from all over the world. This can increase the risk of fraud, of sourcing from IUU fisheries or fisheries linked to labour exploitation. However, when key data elements are shared along supply chains through interoperable electronic systems, operators are better able to identify risks of unsustainable or unethical sourcing, as well as health and safety risks. As technology continues to develop, traceability systems will become even easier to implement and manage and will also become more cost-effective.

As companies supplying seafood to EU consumers, we have a responsibility to ensure that all seafood meets the highest standards of environmental sustainability, social responsibility and quality, as these are the cornerstones for achieving the sustainable development agenda.

With this in mind, we believe that:

- A digital traceability approach is needed to ensure a transparent supply chain. The approach must ensure that all data elements necessary for a transparent supply chain are recorded and transmitted at every step along the path of a fish and seafood product.
- A digital approach must cover all fish and seafood products available on the EU market, including preserved and/or processed products, not least those imported into the EU.
- Small suppliers and small and medium sized enterprises (SMEs) need support in the digital transition and the introduction of user-friendly tools. The Operational Programmes prepared by the Member States under the European Maritime, Fisheries and Aquaculture Fund (EMFAF) should foresee funding to support small suppliers and SMEs in the digital transition and the introduction of user-friendly tools, according to the rules established under such regulation. The EMFAF Operational Programmes should take into account the objectives of digital transition.

- Implementing a new standard for capturing and transmitting data in a digitalised way throughout the seafood supply chain will require time. Therefore, we propose a transition period that allows all stakeholders to obtain the necessary tools.

We call on EU decision-makers to regulate the implementation of a robust digital traceability approach for seafood in the EU to ensure a level playing field for all product categories. This will bring benefits to EU consumers, seafood companies and our environment.

Signatories (in alphabetical order)

Ahold Delhaize



Hugo Byrnes
VP Product Integrity

ALDI Einkauf SE & Co. oHG



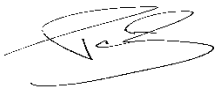
Erik Hollmann
Director Corporate Responsibility Quality Assurance International

ALDI SÜD Group



Niklas Wehner
Senior Manager Corporate Responsibility International

Diversity Seafoods



Paul O Boyle
Managing Director



EDEKA ZENTRALE Stiftung & Co. KG



Stephanie Finkbeiner
Head of Sustainability

METRO AG



Veronika Pountcheva
Global Director Corporate Responsibility &
Senior VP

REWE GROUP



Dr. Daniela Büchel
Member of Board Retail Germany

Spar Austria



Mag. Markus Kaser
Member of the Board

Sysco France



Patrick Dupont
Seafood Director