

# SEAFOOD FRAUD IN CANADA

2021 TESTING RESULTS REPORT



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# Executive Summary

In spring 2021, Oceana Canada tested 94 seafood samples from grocery stores and restaurants in four major Canadian cities: Toronto, Montreal, Ottawa and Halifax. We found that of the samples tested, 46 per cent were mislabelled. This is consistent with national testing conducted between 2017-2019, which showed that 47 per cent of 472 seafood samples tested were mislabelled in some way. Of these, 51 per cent of 373 samples were previously mislabelled in the same four cities tested.

The plan to implement seafood traceability continues to garner high levels of support from Canadians. According to market research conducted by Abacus Data for Oceana Canada in spring 2021, 87 per cent of Canadians are concerned about purchasing seafood that is mislabelled, up 11 points from December 2020. Eighty-six per cent are concerned about the government's lack of action to address seafood mislabelling and illegal fishing in Canada.

In 2019, the federal government committed to implementing boat-to-plate traceability for seafood. Doing so would bring Canada more in line with widely accepted global best practices.

Oceana Canada is calling on the federal government to commit to a timeline to implement traceability; require catch documentation to identify the origin and verify the legality of imported products; introduce regulations to require traceability; improve labelling standards; and expand enforcement.



**The situation is clear: Canada still has a seafood fraud problem.**



## Seafood traceability in Canada: the story so far

From 2017-2019, Oceana Canada tested seafood samples across six Canadian cities, revealing that 47 per cent of them were mislabelled. This was the most comprehensive study on seafood fraud in Canada to date and was consistent with earlier studies in Canada and globally. There was widespread outcry from consumers following this revelation, and with good reason: eating mislabelled seafood poses health risks, results in consumers paying more than they should, threatens fish stocks and fragile ocean ecosystems and contributes to human rights abuses.

At the end of 2019, the federal government committed to implementing boat-to-plate traceability for seafood, tasking the ministers of Fisheries and Oceans, Health and Agriculture and Agri-Food with leading the development of a Canadian traceability system. Doing so would bring Canada more in line with widely accepted global best practices and systems in place in some of the largest seafood markets in the world: the European Union, the United States and Japan.

However, almost two years later, Canada still does not have a system of boat-to-plate traceability for seafood, meaning that there is no way for consumers to know where the seafood on their plate really comes from, or even if it was legally or sustainably caught.

The COVID-19 pandemic understandably slowed down the process of developing a seafood traceability program in Canada. With this process waylaid for the initial, uncertain months of the pandemic, Oceana Canada worked with fisheries economists at the University of British Columbia to research another consequence of poor traceability: Canada's contribution to and losses from illegal, unreported and unregulated (IUU) fishing around the world. Our 2020 report found that Canada is losing millions of dollars each year because of our opaque seafood supply chains. Canadians are spending up to \$160 million a year on seafood caught through illegal fishing and Canada is losing up to \$93.8 million in tax revenue each year due to the illicit trade of seafood products.

As with seafood fraud, the federal government has cited IUU fishing as a global concern that Canada must do its part to address; in 2019, the government provided \$1.2 million of funding



to Global Fishing Watch to improve transparency in fishing industries around the world. In February 2021, Fisheries and Oceans Canada announced a new program to combat IUU fishing using new technologies that can detect vessels fishing illegally. The Minister of Fisheries and Oceans, Bernadette Jordan, said of the initiative: “Illegal fishing threatens the health of our fish stocks and takes resources away from hard-working, law-abiding fishers...We’re partnering with other ocean nations to better detect and prevent illegal fishing around the world.”

This is important work. Technological advances in the last decade have changed the game when it comes to detecting vessels conducting IUU activity, and the Canadian government’s continued commitment to using and growing this technology is encouraging. Without robust traceability, however, there is no guarantee that products of illegal fishing aren’t making their way into Canadian supply chains.

The plan to implement seafood traceability continues to garner high levels of support from Canadians, even more so since December 2019. According to market research conducted by Abacus Data for Oceana Canada in spring 2021, 87 per cent

of Canadians are concerned about purchasing seafood that is mislabelled, for example farmed fish labelled as wild or labelled as the wrong species altogether, up 11 points from 76 per cent in December 2020. Eighty-six per cent are concerned about the government’s lack of action to address seafood mislabelling and illegal fishing in Canada.

Given widespread concern among Canadians and a lack of progress toward developing a boat-to-plate traceability system, in the spring of 2021 Oceana Canada tested seafood samples in four of the six cities originally tested in 2017-2019 to see if the problem of mislabelling had improved. The latest results found that 43 of the 94 samples tested – 46 per cent – were mislabelled, compared with 51 per cent for the same cities tested from 2017-2019, and 47 per cent for all six cities. The situation is clear: Canada still has a seafood fraud problem.



# 2021 Seafood Fraud Investigation

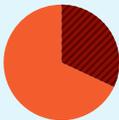
In spring 2021, Oceana Canada tested 94 seafood samples from retailers and restaurants in four major Canadian cities: Toronto, Montreal, Ottawa and Halifax. We found that of the samples tested, 46 per cent were mislabelled. This is consistent with national testing conducted between 2017-2019, which showed that 47 per cent of 472 seafood samples tested were mislabelled in some way. Of these, 51 per cent of 373 samples were previously mislabelled in the same four cities tested.

In the last four years, despite the government's acknowledgment that boat-to-plate traceability is needed to stop seafood mislabelling in Canada, the situation has not improved.



# Results

In spring 2021, Oceana Canada revisited four of the six cities we had previously tested to see if the problem of mislabelling had improved. Here's what we found:

CITY	2021 TESTING	2017-2019 TESTING	↕ ↗
TORONTO	 <p>50 per cent mislabelled</p>	 <p>59 per cent mislabelled</p>	
MONTREAL	 <p>52 per cent mislabelled</p>	 <p>61 per cent mislabelled</p>	
OTTAWA	 <p>50 per cent mislabelled</p>	 <p>46 per cent mislabelled</p>	
HALIFAX	 <p>32 per cent mislabelled</p>	 <p>38 per cent mislabelled</p>	

## 2021 FINDINGS



- Our latest round of testing found 10 instances where products labelled as butterfish or tuna were actually escolar. This oily fish can cause acute gastrointestinal symptoms such as diarrhea, vomiting and nausea, and is banned from sale in several countries.

- We found one species of fish that isn't currently authorized to be sold in Canada, even though there are almost 900 species currently on the Canadian Food Inspection Agency's Fish List.

### Snapper:

- We tested 13 samples labelled as snapper and found eight different species: only two of them were snapper.
- Among the 13 samples labelled snapper, there were three different species of tilapia, a much cheaper species. Seven out of the 13 snapper species we tested were actually tilapia.

### Problem Species - All Mislabelled:

- Seven samples of butterfish
- Eight samples of yellowtail
- Nine samples of white tuna

## Methodology

Oceana Canada's campaign is designed to highlight instances of and to combat seafood fraud. In order to do so, our testing looks for fraud where we suspect there is a problem. Our investigations target species that other studies have shown to be at high risk for fraud due to their economic value, availability or popularity.

# Seafood Traceability Around the World



## European Union

To help address pervasive illegal fishing, the European Union implemented a catch certification scheme, boat-to-plate traceability and comprehensive labelling for all marine wild-caught fish entering the EU market in 2010.



## Japan

In 2021, Japan passed legislation to prevent products of IUU fishing entering the country.



## United States

The United States has had a catch documentation requirement and boat-to-border traceability for some at-risk species in place since 2018.



## Canada

In comparison, Canada does not require that imported seafood include information proving its origin, legality and sustainability status. Instead, Canadian standards only require seafood products to be traceable one step forward and one step back in the supply chain (which has been shown to be ineffective) and require minimal – and at times misleading – labelling information.

# Consumer Confidence

Since December 2020, there has been an increase in concern among consumers about the impact of our weak traceability and labelling standards for seafood sold in Canada. According to market research conducted by Abacus Data for Oceana Canada in spring 2021:

- **87 per cent** of Canadians are concerned about purchasing seafood that is mislabelled, for example farmed fish labelled as wild or labelled as the wrong species altogether, up 11 points from 76 per cent in December 2020.
- **87 per cent** are concerned about the potential revenue lost to the illicit seafood trade of up to \$379 million dollars for Canadian fishers.
- **84 per cent** are concerned about the potential lost tax revenue of up to \$94 million dollars for Canadians.
- **86 per cent** are concerned about the government failing to address seafood mislabelling and illegal fishing in Canada.





# Recommendations for the Federal Government



1. Commit to an ambitious timeline for implementing full-chain boat-to-plate traceability. To facilitate this, establish and invest in a multi-departmental task force to ensure all relevant departments work together to develop a full-chain traceability framework for all seafood caught, harvested or sold in Canada. The task force would include the Canadian Food Inspection Agency, Fisheries and Oceans Canada, Health Canada, Agriculture and Agri-Food Canada and the Canada Border Services Agency.



2. Require catch documentation to identify the origin and verify legality of all imported and domestic seafood, in line with that currently required by the EU and recommended by the Food and Agriculture Organization of the United Nations, which Canada agreed to support at the 2018 G7 Summit. Ensure that new Canadian traceability and catch-documentation systems are interoperable with emerging and evolving global systems to avoid a regulatory burden on industry and the creation of loopholes for illegally sourced products.



3. Introduce regulations to require full-chain traceability, including information about when, where, how and by whom all fish and seafood was caught. This information must be readily accessible by regulatory bodies through electronic systems.



4. Improve seafood labelling standards so consumers can make informed purchasing decisions. Require information such as the scientific species name, whether the fish was wild caught or farmed, its geographic origin and the type of fishing gear used to appear on retail labels, as is required in the EU.



5. Continue to improve DNA testing for imported and domestic species authentication in the Canadian Food Inspection Agency's inspection program and invest in inspection, verification and enforcement mechanisms at levels high enough to deter fraud.

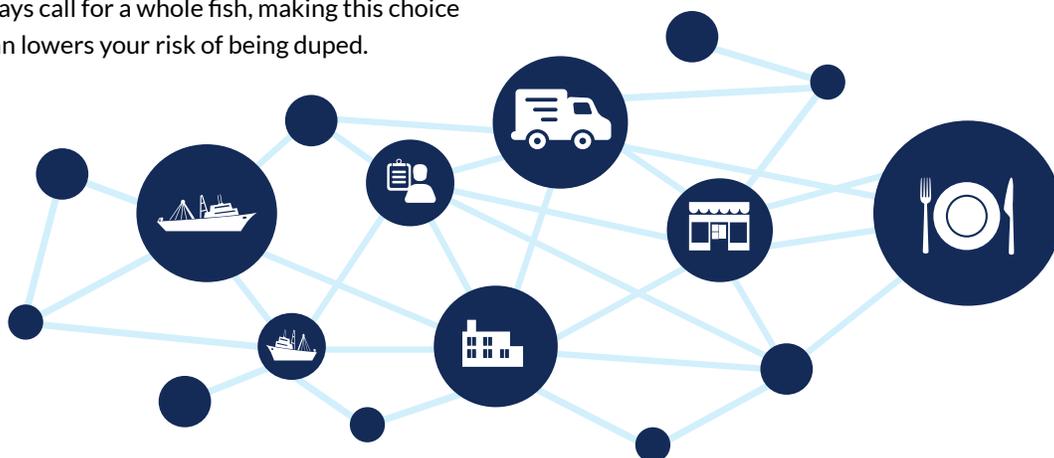


6. Continue to expand funding of IUU-combatting technology programs and organizations, such as Global Fishing Watch and Fishery and Oceans Canada's Dark Vessel Detection program.

# What Consumers Can Do For Now

Ultimately, it shouldn't be up to consumers to be experts in seafood labelling to avoid buying mislabelled fish. Canadians should be able to feel confident that the seafood they buy is safe, legally caught and honestly labelled. Until robust policy is put in place to ensure this becomes a reality, there are steps that people can take to lower their risk of becoming a victim of seafood fraud.

- 1. Get informed about the fish you're buying;** Ask questions at the seafood counter. Does the vendor know exactly what species of fish they're selling, along with where, how and when it was caught? If they can't answer those questions confidently, it's not a good sign. Vendors themselves are often victims of seafood fraud. So even if a grocery store or restaurant owner is trying to do the right thing, there may be a limit on how far back through the supply chain they can trace the products they're buying.
- 2. Look into the price you should expect to be paying for seafood:** If you know how much you should be paying, it will be easier to spot something that's too cheap to be believable. If the price seems too good to be true, it probably is and might be mislabelled seafood.
- 3. Buying a whole fish reduces the risk of fraud.** Even for experts, distinguishing between fillets of fish can be nearly impossible without DNA analysis. It's much easier to identify a whole fish, and much harder for an unscrupulous actor to pawn it off as something else. While your recipe may not always call for a whole fish, making this choice when you can lowers your risk of being duped.
- 4. Try to eat in season.** Choosing a species of fish that's likely to be abundant at specific times of year means it's more likely that you're getting the real thing. Often seafood fraud is motivated by high demand and low availability: if consumers want red snapper, but that's hard to come by at that time of year, a cheaper, more readily available species like tilapia can be substituted. Knowing if it's normal to find a type of fish on the menu when you're buying will help you make an informed choice.
- 5. If you can, try to buy locally or even from the fisher themselves...** through a community supported fishery program which are an increasingly popular business model that see local fishers sell directly to the consumer. The shorter the supply chain, the lower the chance of seafood fraud. If that isn't an option, you can support smaller fish mongers or businesses that have put in place their own traceability systems or have been certified by voluntary programs. Additionally, look for products with independent chain of custody certification, like MSC.





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## Add your name to Oceana Canada's petition urging the government to fulfill its commitment on boat-to-plate traceability.

Go to [Oceana.ca/StopSeafoodFraud](https://Oceana.ca/StopSeafoodFraud)

Sign up as a Wavemaker today, and follow us on Facebook, Twitter and Instagram.



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## **We can save the oceans and feed the world.**

Oceana Canada was established as an independent charity in 2015 and is part of the largest international advocacy group dedicated solely to ocean conservation. Oceana Canada has successfully campaigned to end the shark fin trade, make rebuilding depleted fish populations the law, improve the way fisheries are managed and protect marine habitat. We work with civil society, academics, fishers, Indigenous Peoples and the federal government to return Canada's formerly vibrant oceans to health and abundance. By restoring Canada's oceans, we can strengthen our communities, reap greater economic and nutritional benefits and protect our future.