

December 2021

BOAT-TO-PLATE TRACEABILITY MANDATE COMMITMENT CONSULTATION

Submission to the Canadian Food Inspection Agency



Oceana Canada submission: boat-to-plate traceability consultation

Oceana Canada is grateful for the opportunity to participate in the consultation on the government's boat-to-plate traceability mandate. Our organization is concerned that after almost two years of consultations, the government's discussion paper does not outline a timeline, next steps or a strategy to protect Canadian fishers, seafood businesses, consumers and our oceans from the economic and environmental losses associated with mislabelled and illegally caught products.

Disappointingly, the discussion paper does not outline technical or logistical proposals for the development of a traceability framework for stakeholders to engage with, further prolonging the implementation process and delaying Canada's participation in a global push to increase transparency and harmonize traceability practices in seafood supply chains.

Oceana Canada is calling on the federal government to take concrete action toward implementing a boat-to-plate traceability system in Canada to prevent fraud and mislabelling, and to prevent seafood products that are caught illegally or with inhumane working conditions from entering Canadian supply chains.

Canada's current one step forward, one step back" traceability is ineffective

Seafood traceability addresses a broad range of complex issues, including food safety and legality. Approaches designed to address issues of food safety or mislabelling for other food products regulated by the Canadian Food Inspection Agency (CFIA) will not prevent illegal seafood products from entering Canadian supply chains. A 2019 European Union report found that "one step forward, one step back" traceability was ineffective for verifying products quickly and that it was not able to function as a framework that ensured both food safety and legality of seafood products. Seafood is a high-risk product for food fraud; this includes mislabelling, but also includes illegal products making their way into supply chains. Seafood cannot be regulated in the same way as food products that originate predominantly within Canada and have shorter, less complex supply chains, such as dairy or poultry.

There is now a global push toward harmonized traceability, transparency and best practice labelling in seafood supply chains. Non-governmental organizations, national governments, the seafood industry and the public all recognize the need for wider adoption of full-chain digital traceability to ensure safe, legal and accurately labelled seafood products. Traceability systems that track information about a product along a supply chain have been successfully used for many years to ensure product health and safety and to determine legality.

Global best practices exist; Canada does not need to reinvent the wheel, but rather build a framework that is interoperable with existing traceability systems. Experience from other regions, such as the European Union and the United States, shows that boat-to-plate traceability regulations work to stop fraud and protect consumers, oceans and wild fish. Creating traceability requirements has significant potential benefits for Canadian sellers, especially as a way for small-

scale fishers to distinguish their products in the marketplace by increasing the transparency of their brand.

Canadians want a seafood traceability system

Canada's failure to address this issue with urgency is leaving Canadian consumers and honest fishers vulnerable. Market research conducted by Abacus Data for Oceana Canada in 2020-2021 found that 95 per cent of Canadians support seafood traceability; 86 per cent are concerned about the government's failure to address seafood mislabelling and illegal fishing and 46 per cent say they will purchase less seafood – or stop purchasing it all together – after learning about Canada's current standards.

Canada is vulnerable to seafood fraud

Currently, Canada does not require that imported seafood include information needed to determine its origin, legality or sustainability status. Leaving our market open to lower quality, cheaper, and potentially illegal products has significant economic consequences; Oceana Canada's 2020 report on illegal, unreported and unregulated (IUU) fishing practices found that Canada's weak seafood supply chain traceability standards are resulting in annual losses of up to \$93.8 million in tax revenue and up to \$379 million in revenue for Canadian seafood industry workers. On top of this, Canadians are unwittingly spending up to \$160 million a year on seafood caught through IUU fishing – including seafood potentially caught by victims of modern slavery.

We acknowledge industry and retailer efforts to improve traceability, though the lack of a consistent regulatory standard or approach to catch documentation and traceability is creating a highly fragmented and inconsistent environment across regions and fisheries. Thankfully, steps already in place should mean that the Canadian fisheries industry is well-placed to comply with a new, integrated system without much additional cost or infrastructure. In fact, as other countries implement more robust traceability systems, Canada risks creating a regulatory burden on our own fisheries and processors if we fail to create a system that is aligned and interoperable with global markets. Failing to establish a uniform, regulation-based traceability standard is also placing Canadian fisheries at significant risk of having to comply with multiple, piecemeal traceability systems around the world.

Canada continues to fall short on labelling standards.

As global seafood supply chains continue to increase in complexity, the ability to track product information from boat to plate is critical in ensuring safety, limiting risks of fraud, and promoting sustainable seafood. Current standards do not require seafood products to display their original point of origin, method of catch or scientific species name. Canada must implement regulations that require seafood labels to include these data points. While other countries are proactively moving forward with this approach, Canada is still lagging behind some of our major trading partners and is at risk of losing global market share. As our global seafood supply chains continue to increase in complexity, the ability to track product information from "boat to plate" is more critical than ever in ensuring safety, limiting fraud and promoting sustainable seafood. Testing in Canada has shown that seafood mislabelling is common, affecting public health and food safety. Eating mislabelled products can unknowingly expose consumers to allergens, toxins or environmental contaminants.

Recommendations for a world-class traceability system

As part of a comprehensive framework to protect consumers regarding food safety (as it relates to fish and seafood), facilitate sustainable fisheries management, and combat global IUU fishing and ensure ongoing market access, trade, and marketing of Canadian fish and seafood, Oceana Canada recommends that 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 CFIA, Fisheries and Oceans Canada (DFO), 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. Improve 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 European Union.
5. Continue and improve DNA testing for imported and domestic species authentication in CFIA's inspection program and invest in inspection, verification and enforcement mechanisms at levels high enough to deter fraud.
6. Continue and expand funding of IUU-combatting technology programs and organizations, such as Global Fishing Watch and DFO's Dark Vessel Detection program.

As public opinion trends increasingly towards transparency in food supply chains, Oceana urges the federal government to follow through on its commitment to implement a robust, regulatory boat-to-plate traceability framework that will align with other global systems and effectively serve Canadian fisheries and consumers now and in the future.

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. Oceana.ca