

**European Association of Fishing Ports and Auctions**  
**Association Européenne des Ports de Pêche et Criées**  
**Asociación Europea de Puertos Pesqueros y Lonjas**

## **Fish auctions guarantee traceability of fishery products**

### **EAFPA Position Paper on Traceability and the role of Fish Auctions**

In February 2002, EAFPA issued an identity card and a political platform in order to present itself and its priorities at EU level. Both documents were circulated to 300 key actors at the EU Commission, European Parliament, EU Council, Permanent delegations of the member states & professional associations. The response to this initiative was positive and has led to numerous contacts.

Following the general description of the key dossiers, EAFPA will define specific positions on these topics in the coming months, the first one being this position paper on traceability.

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## Traceability, an EU concept for quality management and food safety

↓ Traceability is a concept that gained importance due to various food crises such as BSE, dioxins, all of them linked to meat. It is therefore only logical that traceability is to be applied to fish, an equally important part of human consumption.

↓ At EU level, the European Commission has embodied its view on traceability into the recently published **Regulation (EC) n° 178/2002** laying down the principles of food law and establishing the European Food Safety Authority.

According to this Regulation, traceability means that operators should ensure that a food product and its history can be traced back through the whole production chain. Each food operator has consequently a role to play by ensuring that the food product can be traced upstream and down-stream of its step in the chain.

The Regulation also sets out the legal basis for the RASFF, the Rapid Alert System for Food and Feed (art. 51). The system aims to set up an information network to alert Member states of risks related to food and to avoid commercialisation of foodstuffs that represent a serious risk for public health.

**Fish auctions do not have the intention to replace the control authorities in the various member states. They are nevertheless willing to offer their assistance to control authorities when required.**

↓ Different initiatives have already been taken to set up fish traceability. There is nevertheless no uniformity or coherence between the various initiatives.

↓ EAFPA is aware of the TRACEFISH project financed by the EU: a project that aims to develop an electronic system of chain traceability for fish. As EAFPA believes that auctions have one of the most essential roles in the practical implementation of such an electronic traceability system, it eagerly awaits the results of this project, which look promising and innovative so far.

## Traceability in fish auctions: Data Registration, Certification & an EAFPA trade mark

EAFPA, which represents the European auctions, the first point of sale for fresh fish, recognises the importance of traceability in safety and stock management. It strongly believes in the prime role auctions can play in traceability of fish processed through them and therefore would like to present its views on the role of auctions in traceability of fish.

### 1. Obligatory record keeping

**EAFPA – in close co-operation with the EU institutions – is willing to develop minimum standards on data collection in auctions as well as an efficient system to record & transfer this data.**

**Current legislation on traceability & labelling of fishery products does not take into account the valuable and pivotal role of auctions. EAFPA hopes this position paper can be the basis of EU legislation regulating data collection for fish, which explicitly recognises the role of auctions.**

Auctions – the first link after capture in the fish processing chain – are the natural choice for establishing the prime elements of fish traceability. Auctions are the link between fishing vessels and the first buyer.

Besides completing their main task, which consists in the concentration of offer & demand to guarantee a fair price, auctions are an extremely adequate venue for organising data collection and record keeping. The latter activities provide an added value for the primary job of price setting.

The collection of data by auctions should be funded by a small flat fee and "ad valorem" tax, as the information is gathered for public benefit. Furthermore, the collection of data not only permits tracing the fish back to its origin but also facilitates efficient management of stocks.

### ***What type of data?***

Aware of the fact that information will get lost in the multiple stages of the processing chain, EAPFA encourages auctions to collect a maximum amount of data on the fish that passes through them, consisting of a list with the following elements:

For fresh captured fish	For farmed fish
<ul style="list-style-type: none"> <li>• VESSEL               <ul style="list-style-type: none"> <li>– identity: name and number</li> <li>– ICES area of fishing</li> <li>– length of trip</li> <li>– method of fishing</li> <li>– treatment on board</li> </ul> </li> <li>• DATE AND TIME OF LANDING THE CATCH</li> <li>• LANDING DECLARATION               <ul style="list-style-type: none"> <li>– handling details</li> <li>– shore treatment</li> <li>– grading method</li> <li>– storage conditions</li> <li>– quality grade</li> </ul> </li> <li>• QUALITY STANDARD               <ul style="list-style-type: none"> <li>– weight and quality by species of catch</li> <li>– date of catch</li> <li>– sale terms including weight, quality, packaging, price</li> </ul> </li> <li>• SALES NOTE               <ul style="list-style-type: none"> <li>– date of sale</li> <li>– purchaser</li> <li>– date and time of dispatch</li> <li>– transporter</li> </ul> </li> <li>• TRANSPORT DOCUMENT</li> </ul>	<ul style="list-style-type: none"> <li>• FARMER               <ul style="list-style-type: none"> <li>– name</li> <li>– address/farm location</li> </ul> </li> <li>• FISH               <ul style="list-style-type: none"> <li>– species</li> <li>– farming period</li> <li>– date of capture/harvest</li> <li>– processing date</li> <li>– freshness date</li> <li>– storage conditions</li> <li>– sorting</li> <li>– quality</li> <li>– packaging</li> <li>– type of feed</li> </ul> </li> <li>• TEMPERATURE OF THE WATER</li> <li>• SALE &amp; TRANSPORT               <ul style="list-style-type: none"> <li>– date of sale</li> <li>– buyer</li> <li>– date and time of pick-up</li> <li>– transporter</li> </ul> </li> <li>• TRANSPORT DOCUMENT</li> </ul>

For fish that is commercialised but not landed for sale by the auction, the same data should be recorded as well as the name and address of the salesman and the date of commercialisation in the auction.

### ***How to transfer data?***

The collected data will be transferred – preferably as an electronic data file but also available on paper – to the next link in the chain. The auctions responsibility is limited to this first transfer of data. The next link in the chain will be responsible for further transfers of data. Only the information necessary to the buyer shall be transferred; the fuller information will be retained by the auction.

### ***Which ports registrate?***

**EAPFA also believes that the registration of this data must be done in specifically designated landing ports which have the specific authorisation to register the information mentioned above. Not all ports would receive such authorisation.**

Furthermore, auctions can guarantee to the authorities that the fish passing through them is accurately recorded and subject to legal controls. If authorised they could also point out the existence of fish that does not pass through them. Authorities are then able to legislate on this illegal fish.

Finally it is important to state that imported fish must be subject to the same rigorous monitoring system as fish caught by EU vessels. Monitoring must begin at the point of capture; full information from that point to arrival in the EU must be registered at the EU border import post.

## Management of stocks

EAFPA believes matters should even go further by creating the legal obligation for fishing vessels to land to and through auctions. This is currently not obligatory in Europe with the exception of Belgium where such a legal obligation does exist and the Netherlands where fishermen voluntarily agreed to land in auctions.

**Since auctions are the only central point for data collection, they have an added value in the fact that they can provide the government control bodies with the useful data they have collected thus improving the basis for the management of stocks.**

## 2. Certification of auctions' management system

**EAFPA is willing to actively assist the EU authorities in the development of a harmonised EU certification system for auctions.**

EAFPA believes that the systems, that auctions use to manage the resources, should be certified. This means a certification of the tracking procedure of fish passing or sold through auctions and not of the quality and/or safety of the fish caught. The latter should – as at present – be certified by the producer.

Fish labelled with the name of a certified auction thus guarantees that it has gone through the rigid registration/traceability procedure applied by the auction.

*A possible certification system is Trace-Fish Garanty International (TFGI). The TFGI is a food safety plan, which certifies that EAFPA auctions live up to the current international standards on food safe handling and traceability of fish.*

## 3. EAFPA trade mark

EAFPA is engaged in a long-term action programme, which consist in issuing position papers on numerous issues that concern fish auctions. This action programme will eventually also lead to the creation of an EAFPA trade mark.

Once the certification of auctions' management systems is achieved, EAFPA believes that it could be useful and advisable to create an EAFPA trade mark attesting that fish comply with EAFPA standards on traceability procedures.

In the future such an EAFPA trade mark could join initiatives certifying responsible fishing.

**The EAFPA trade mark will not only certify the quality of traceability procedures in auctions. It also certifies the origin of the traced fish, as it allows consumers to trace the fish back to the certified auction, member of EAFPA.**

## Conclusion

**EAFPA sets 3 priorities on traceability in auctions:**

- ⚓ **Obligatory data registration**
- ⚓ **Certification of auctions' management of resources**
- ⚓ **EAFPA trade mark**

**EAFPA is convinced that these 3 priorities are necessary tools to guarantee efficient traceability of fish and is willing to collaborate closely with EU authorities to apply these priorities.**