Executive Summary

Providing catch data to consumers and traceability:

A comparison of EU and Japan's rules and implementation

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Background

Fish, clam, shrimp, and other fishery resources around the world are in decline, and one of the main drivers is "overfishing," namely, the excessive exploitation of fishery resources. Addressing this problem requires effective, science-based resource management. However, even if countries establish systems and laws to implement such fisheries management, those measures would serve little purpose unless they are complied with.

One of the major problems undermining the effectiveness of such resource management is IUU (Illegal, Unreported, and Unregulated) fishing.

It has been estimated that seafood derived from IUU fishing accounts for roughly 30% of the wild-caught seafood that Japan imports, and that the global scale of the damage is equivalent to Japan's combined production value from wild capture fisheries and aquaculture. Moreover, within Japan as well, cases of poaching, underreporting, and falsification of origin continue to occur.

IUU fishing is a serious threat not only to the sustainable use of marine resources but also to the conservation of marine biodiversity. Measures to address IUU fishing are also required for aquaculture, as juveniles and fish used as feed ingredients are primarily sourced from wild capture fisheries. Furthermore, reports have begun to emerge of human rights issues associated with IUU fishing, including conditions of slave labor among crew members and situations that threaten the health and lives of fisheries observers (investigators who survey and report on bycatch and actual catches), and there is an urgent need to strengthen countermeasures without delay.

To eradicate IUU fishing, it is necessary to: <1> strengthen fisheries management so that countries do not allow IUU fishing to take place; and <2> introduce effective regulations to prevent the importation of, and distribution in domestic markets of seafood derived from IUU fishing. With regard to <1>, measures to combat IUU fishing are being advanced mainly through regional fisheries management organisations (RFMOs) and the like. With regard to <2>, initiatives are being advanced to strengthen and expand efforts to prevent the circulation of IUU-derived seafoods, including efforts by the European Union (EU), the United States (US), and Japan-the world's three largest seafood importers-, to require the submission of catch certificates containing catch data such as when, where, by whom, how, and how much was caught, when importing seafoods.

As a step toward preventing the importation and distribution of seafood derived from IUU fishing, it is important that: 1) such catch data is accurately transmitted throughout production, processing, distribution, and sales; 2) that data transmission is electronically connected; and 3) the final consumer can access the data when making

a purchase. WWF Japan has aimed to realize consistent traceability across production, processing, distribution, and sales that enables seafood to be tracked from catch through to actual purchase by the final consumer ("full-chain traceability"*), in order to build and conserve a sustainable marine environment for marine ecosystems including fishery resources and the people who work there. Such catch data is extremely important not only for verifying sustainability including stock status, its management, and impacts on ecosystems, but also for consumers who can use it to make purchasing choices based on sustainability-related information. However, ensuring traceability through the supply chain for seafood that moves across borders involves many difficulties, and progress remains limited even with respect to achieving 1) the accurate transmission of catch data described above.

In the EU, with regard to providing information to consumers who are the final point in the supply chain, there is a well-established recognition that consumers "play an important role in sustainability governance." For that reason, the EU aims to provide information to consumers through seafood labeling, as an important element for promoting more sustainable purchasing choices and ultimately contributing to the achievement of the sustainability goals of the CFP (Common fisheries policy: the basic framework for managing wild capture fisheries and aquaculture within the EU and ensuring the sustainable use of marine resources).

Meanwhile, although Japan has been a global forerunner in requiring country-of-origin labeling and ingredient origin labeling for foods, there is currently little momentum to require labels to display catch areas and fishing gear so that consumers can understand the stock status of seafood products and their impacts on ecosystems.

Objectives

This report focuses on "accurate communication of information to consumers." It compiles examples from the EU, where institutional design and initiatives are more advanced in realizing the display of such information (CMO Regulation for fishery and aquaculture product No 1379/2013), and compares them with the current status of Japan's Food Labeling Standards.

Moreover, because providing information to consumers requires ensuring the transmission of information between business operators and the accuracy of that information, this report also introduces comparisons of the relevant rules and implementation, including the content of the amended Regulation No 2023/2842 adopted at the end of 2023, with respect to the regulation that mandates these requirements (Fisheries Control Regulation No 1224/2009).

Among the various EU regulations introduced in this report, the Fisheries Control Regulation (Regulation No 1224/2009), together with the IUU Regulation No 1005/2008 (the IT tool CATCH, which the EU requires to be used, streamlines the confirmation and verification of catch certificates), is being implemented and enforced, with many of the amendments introduced by Regulation No 2023/2842 applying from January 10, 2026. We have published this report at this time in the hope that it will serve as an opportunity for broader social discussion and consideration of desirable institutions and mechanisms for improving traceability.

Food is a benefit bestowed by the Earth's resources, and ensuring the sustainability of food production also entails responsibilities and roles for the consumers who consume that food. At a time when consumer interest in the sustainability of food supplies is rising due to environmental change, we also consider it an important paradigm shift to adopt the perspective consumers can contribute to shaping a sustainable seafood market by providing sufficient sustainability-related information. We hope that this report will help further accelerate efforts to secure full-chain traceability to consumers and eradicate IUU fishing.

* One example of full-chain traceability is the GDST. The GDST is an inter-company platform established to create international standards for seafood traceability. In March 2020, it released the world's first industry standard that enables seafood to be tracked consistently from catch through to sale, "GDST 1.0 Standards and Guidelines for Interoperable Seafood Traceability Systems" (GDST1.0). GDST 1.0 sets out the key data elements that must be recorded and transmitted within the supply chain (KDEs: Key Data Elements) and standards governing the technical formats and nomenclature for sharing data among interoperable traceability systems.

Results

This report compiles and compares the rules and implementation status in the EU and Japan with respect to communicating catch area and fishing gear information on seafood products to consumers.

In the EU, which is ahead in this area, the following points became clear.

- EU seafood traceability is intended to support food safety, control fraud, provide consumers with information that is accurate and supports the selection of seafoods derived from fisheries with a high capacity for the sustainable use of resources, and eliminate IUU fishing.
- Displaying the catch area and fishing gear when selling seafood products is mandated under the CMO Regulation for fishery and aquaculture product (Regulation No 1379/2013).
- Ensuring the transmission of information between business operators and the accuracy of that information is mandated under the Fisheries Control Regulation (Regulation No 1224/2009). Under this regulation, the requirement for operator-to-operator transmission in digital form began on January 10, 2026.
- From January 10, 2026, together with digital transmission of information, the recording and transmission of the unique fishing trip identification number has been introduced (making it possible to identify fishing operation status and landing status). In addition, for imported seafoods, the obligation to introduce and use the IT system for catch certificates known as EU CATCH has begun.
- In light of the realities and trends of the EU regulations, including import controls in digital form through EU CATCH (IUU Regulation No 1005/2008), the mandating of digital transmission of information (Fisheries Control Regulation No 1224/2009), and the mandating of providing catch data to consumers (CMO Regulation for fishery and aquaculture product No 1379/2013), it is clear that digitalization is a key factor in ensuring traceability.

With regards to Japan, the following current situation became clear.

- The “Food Labeling Standards” cover the labeling rules applied when products are sold to consumers.
- However, there are gaps in the reporting of catch data that underpins reliability and in transmission between business operators, which pose challenges in ensuring transparency.
- Moreover, the “origin” under the Food Labeling Standards is not linked to the “Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants,” which is an IUU fishing countermeasure law and an import management system. As a result, Japan’s import management system (the Act on Ensuring the Proper Domestic Distribution and Importation of Specified Aquatic Animals and Plants), unlike that of the EU (Fisheries Control Regulation No 1224/2009: transmission of information between business operators/distribution stage/CMO Regulation for fishery and aquaculture product No 1379/2013: consumer labeling), cannot be traced back at the point where the final consumer makes a purchasing choice.

Implications for the Future

WWF Japan considers full-chain, digital, and interoperable traceability indispensable for evaluating environmental and social risks. To build and conserve a sustainable marine environment for marine ecosystems, including fishery resources, and the people who work there, WWF Japan has encouraged stakeholders involved in the production, processing, distribution, and sale of seafoods to adopt and implement GDST1.0.

However, ensuring traceability through the supply chain for seafood that moves across borders involves many difficulties. WWF Japan considers that the advanced EU examples on “accurate communication of information to consumers,” as reported in this report, can offer hints for efforts to improve traceability.

In Japan, interest in the sustainable production of food is rising. At the same time, against the backdrop of recent food price increases and the resulting shift toward price-driven food choices, it is indispensable to improve consumer literacy on sustainable food production and to provide sufficient information for that purpose. In addition, it is also necessary to make "voices calling for the labelling of sustainability-related information of products" visible as a social demand.

Furthermore, to realize accurate communication of information to consumers, coordination is essential among the competent ministries and agencies involved across the entire flow, including the Fisheries Agency, the Ministry of Agriculture, Forestry and Fisheries, and the Consumer Affairs Agency, which oversee the regulations relevant to the supply chain.

Securing full-chain traceability for seafood offers major benefits across the supply chain, not only by excluding seafoods derived from IUU fishing, but also by ensuring food safety, controlling fraud, checking for human rights violations, and providing consumers with sustainability-related information.

In Japan, it is desirable for institutions and mechanisms for improving traceability to be discussed and considered more broadly in society. Going forward, while it is also said that roughly 30% of the seafoods imported into Japan are derived from IUU fishing, WWF Japan will continue to engage relevant ministries and agencies, collaborate with relevant companies and organizations, and provide and disseminate information to consumers, so that mechanisms are put in place that enable consumers to make responsible choices that take environmental and social aspects into account.