

# Labelling Fisheries Products

**FAQs** 



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# Labelling fisheries products: Frequently Asked Questions

#### **Amendments:**

Date	Version	Details of change			Approved by
24/08/2021	v1.0	Original 24/08/2021.	document	approved	Jennifer Spencer
30/01/2025	V2.0	Updated alongside changes to gov.uk main guidance			Andrew Newlands

#### Introduction

Labelling of fisheries products, from point of capture through to sale to the final consumer is important for Traceability and is required under legislation. This document aims to support the guidance on the MMO website by providing answers to some specific questions relating to labelling requirements. Links to the relevant legislations can be found at the end of this document.

# **Summary of requirements**

Regulations require the following information to be included on a label, as a minimum at the moment when fisheries products are placed into lots, and no later than the first sale:

- a) The ID number of each lot
- b) PLN and name of the fishing vessel
- c) The FAO code, common name or scientific name of each species\*\*
- d) The date of catches or production
- e) The quantities of each species in kg expressed as net weight (or number of individuals where appropriate) \*
- f) Name and address of suppliers
- g) Relevant ICES area\*\*
- h) Production method (e.g. caught or farmed)\*\*
- i) Gear code, e.g. beam trawl TBB\*\*
- j) The 'date of minimum durability' also referred to as best before date\*\*
- k) Whether the fisheries products have previously been frozen or not

Further details on the minimum labelling requirements can be found on our website by following this link: <u>Traceability and labelling information.</u>

<sup>\*</sup>Where any fish are present below the minimum conservation reference size (MCRS), separate information on the quantities in kilograms or total number of individuals should be provided.

<sup>\*\*</sup>These pieces of information are required to be available to the consumer at the point of retail sale, so it is essential that this information is passed along the supply chain.

## 1. What fish/fisheries products need to be labelled?

Any fisheries products that are to be placed, or likely to be placed, on the market (e.g. sold commercially), are required to be labelled, including all wet fish and shellfish. This includes any catches of any species below minimum conservation reference size that have been landed under the landing obligation.

# 2. Can I split or merge different lots of fish/fisheries products?

Lots of fisheries products may be merged or split *after first sale*, but only if it is possible to trace them back to the *catching stage*. Where fisheries products from multiple vessels are merged after first sale, a label must include the required information for all the vessels.

# 3. What is the relevant geographical area?

Relevant geographical area means a sea area, expressed by reference to a FAO sub-area, division, or sub-division, or where applicable an ICES statistical rectangle, fishing effort zone, economic zone or area bounded by geographical coordinates e.g. FAO 27.7.e

#### 4. What information needs to accompany my fish when I land?

On landing, all fish (including shellfish) should be adequately labelled to ensure traceability. The following information should be included on a label as a minimum:

- Vessel name and PLN
- Species FAO code
- Quantity of each species (net weight in kg)
- Fishing trip dates, including date of landing if different from fishing trip end date
- Port of landing
- ICES area of capture e.g. Area 7D
- Fishing gear used

#### 5. Why do I have to include my port of landing?

The port of landing must be declared by the registered buyer or seller at first sale on the sales notes they submit to the MMO. By including this on the label accompanying your catches, the correct information on port of landing is passed to the buyer. This is especially of importance when catches are being transported out of area to be sold.

# 6. Do I need to label every box of fish I land?

Each box of fish that is landed must be labelled. At a minimum, all boxes landed require a unique identification number on a label, to match to a corresponding document with the same unique identification number which details the rest of the required information.

How you choose to comply with this requirement is up to you to determine. MMO have created label templates which you can download and print which capture the information required to be on catches prior to the first sale. Please note, you do not have to use the MMO templates, you can choose how to label your catches and provide the information – however you must provide the required details.

## 7. Do I have to use a paper label?

You can decide how to label your catches, but you must ensure you provide the required information. You can use paper labels, or electronic labels such as bar codes/QR codes.

Please be aware that the information contained within the label must be available to fisheries inspectors at all times, so this is particularly important if you choose an electronic system for labelling.

# 8. I sell small quantities of fish/fisheries products direct to the public; do I need to label these items?

Small quantities of products sold directly from a vessel to the public do not require a label, provided sales do not exceed the value of £45 per person per day. However, where catches are to be transported or stored prior to sale, they should be labelled to ensure traceability throughout those stages.

# 9. What weight do I need to declare on a label?

The quantity of fish should be expressed as net weight in kilogrammes on a label. This is the weight of the fish product after any processing, without the addition of its container or packaging, e.g. gutted fish weight excluding box and ice weight.

# 10. Isn't it the market's responsibility to fully label my fish as they are selling it?

At each stage of the supply chain, whomever is responsible for the fish/fisheries products must ensure it is correctly labelled.

As a fisher, you know all the information about where your catches came from, when they were caught, and how. You must label your catches to ensure that information on the provenance of the catches is passed onto the merchant. This information is essential for ensuring the merchant can submit accurate records and label the fish accurately for onward sale. Information like gear in use and area of capture is required all the way through the chain up to sale to final consumer, so it is important that the correct information from the fisher, is passed across at the first point of sale.

# 11. I have printed boat tally labels with the boat name for my landed fish. Will I have to get new labels printed?

Depending on how you wish to label your catches you may need new labels. The MMO has created templates which are available on our website and can be printed for use. The labels can be prepopulated with information where it remains consistent – e.g. vessel name, PLN and possibly area fished/gear used.

#### 12. Is there any financial support for vessels or merchants?

Please contact the MMO Grants team to discuss what funding streams may be available. Email: mff.queries@marinemanagement.org.uk, Phone number: 0208 026 5539.

## 13. I already complete the Catch App, why do I have to do this as well?

The requirement to submit catch information via a Catch Record is a fishing vessel licence condition and the information submitted cannot be accessed by merchants or transporters of fish. The requirement for labelling of fish and fisheries products comes from the Control Regulation (1224/2009) and Control Regulation Detailed Rules (404/2011). See Q.10 for more information.

# 14. Why do I need to include the dates of my trip?

Dates of capture (or production) are required to be carried with the fisheries products under minimum labelling and information requirements as laid out in Article 58(5) of the Control Regulation (1224/2009). In addition, labelling catches with accurate date of landing information means the correct dates are received by the merchant. Merchants are required to record the date of landing on sales notes for all first sale fish purchases, and this information may not otherwise be available to them.

Furthermore, if catches are exported, the exporter must also declare the date of landing. If these dates are inaccurate, it may cause delays or issues when trying to verify catch certificates.

# 15. My catches are placed in a cold store prior to being collected by the merchant and sold. What do I need to do?

When storing catches prior to sale, it is required that containers are adequately labelled, especially in shared storage facilities or where landings from multiple trips are stored. This ensures all catch is attributed to the correct vessel and trip and provides the transporter with all the information that they require to complete a transport document. It also means details in respect of trip dates, area of capture, and gear used are carried with the fish, which is important in allowing the merchant to submit accurate sales notes.

\*Please note: Where catches are being stored prior to first sale, a Takeover Declaration may be required. Please check the guidance on our website to see if this is applicable.

#### 16. Can I use another document as a label? E.g. my paper logbook.

You may be able to use other documents to meet the minimum information and labelling requirements. However, you must ensure that the labelling information required remains with the catches when they are passed across to the merchant. For instance, if you submit your paper landing declaration to the MMO on arrival at your destination, there is no longer a document being carried with the catches that fulfils the labelling requirements.

Documents that meet the requirements:

 A paper landing declaration does contain all of the required information; however, each box must have some form of label to ensure it can be linked with the landing declaration (e.g. a tally with vessel name, PLN and trip dates).

Documents that do not meet the requirements:

- A completed white paper logsheet does not have all the information needed to be a compliant label as only species over 50kg are recorded, and the weights declared are live weight not net product weight.
- A transport document does not detail information on fishing gear used, therefore cannot be used to meet these requirements without this information being added.

# 17. I reuse my boxes on different trips – is that ok?

You may re-use boxes for different trips. However, depending on how you choose to label your fish (e.g. paper labels, electronic labels) you may need to check that the label on the box is current. For instance, where you choose to adhere a label to a box, you must ensure that all old labels are removed and the only label present on a box relates to the catches currently within that box.

# 18. I buy direct from fishing vessels, what do I need to do?

As a registered buyer of first sale fish, you must ensure that you are compliant with the traceability and labelling requirements for all fish/fisheries products that you are responsible for.

You must submit sales notes detailing information on the fish you purchase to the MMO – this includes information on vessel, species, weights, dates and area of capture. You must ensure you have the relevant details from the fishing vessel that you are purchasing from to enable you to submit accurate information and be compliant with your requirements. For more guidance on buying and selling of first sale fish, see our website: <a href="Buyers and sellers of first-sale fish and submission of sales notes - GOV.UK">Buyers and sellers of first-sale fish and submission of sales notes - GOV.UK</a>

# **Relevant Legislation**

Common Organisation of the markets: Regulation (EU) No 1329/2019 of the European Parliament and of the Council of 11 December 2013 on the common organisation of the markets in fishery and aquaculture products

Common Marketing Standards: <u>Council Regulation (EC) No 2406/96 of 26 November 1996 laying</u> down the common marketing standards for certain fishery products

Control Regulation: Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a control system for ensuring compliance with the rules of the common fisheries policy

Fishing vessel licence: <u>Understand your fishing vessel licence - GOV.UK</u>

Control Regulation Detailed Rules: <u>Commission Implementing Regulation (EU) No 404/2011 of 8 April 2011 laying down detailed rules for the implementation of the Council Regulation (EC) No 1224/2009</u>