

# The European market potential for tuna by-catch species

While these by-catch species — swordfish, Patagonian toothfish, mahi mahi and butterfish — have a smaller market than tuna, if you target the right markets, there are opportunities to sell your products to Europe. Swordfish is the most consumed of these species, being especially popular in Southern Europe, but the demand for Patagonian toothfish has been growing, particularly in the United Kingdom. Mahi mahi and butterfish also have their niche markets, but are harder to track due to their low volumes and shared generic HS code for frozen fish fillets: HS 030489.

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## 1. Product description

This fact sheet looks at four by-catch species that are relevant for the European market. While swordfish, Patagonian toothfish, mahi mahi and butterfish are by-catch of commercial tuna fishing, both swordfish and Patagonian toothfish have their own HS codes, therefore can be tracked through the available trade data.

It is important to note that tuna by-catch is not similar to tuna-like species, which are commonly traded in the United States for use in canned tuna production. Tuna-like species exported to the United States are used as raw materials to produce 'chunk light tuna', which refers to products that use a variety of smaller tuna other than the principal tuna species — skipjack, yellowfin and albacore.

These tuna-like species are usually frigate tuna (*Auxis thazard*), longtail tuna (*Thunnus tonggol*), and bonito or kawakawa (*Euthynnus affinis*). There is a growing demand for these species in the United States because they are usually priced lower than the principal tuna species. United States tariffs on tuna-like species are also lower than on principal tunas: 10% versus 12.5% duty.

In Europe, there is an official differentiation between principal tuna and tuna-like species, so tuna-like species cannot be used as cheaper alternatives to principal tunas. For example, you cannot use kawakawa as a raw material for canned tuna production and brand it as 'chunk light tuna'. If used for canning purposes in Europe, the product must clearly state the species on the can.

### Swordfish (*Xiphias gladius*)

Widely distributed in the Atlantic Ocean, swordfish are pelagic predators characterised by a long, flat, pointed bill. The swordfish fishery is very important for Southern Europe, especially Spain and Italy, where swordfish is consumed the most. It is worth noting that swordfish is not a schooling species, and thus gears such as purse seiners or pelagic trawlers are not usually used when targeting swordfish. They are caught in coastal and offshore waters by longline, trawl, harpoon or net. Swordfish is also landed as a tuna by-catch species.

Swordfish is exported to Europe under the following HS codes:

- HS 030247 - Fresh or chilled swordfish (*Xiphias gladius*), excluding fillets, livers, roes and other fish meat
- HS 030357 - Frozen swordfish (*Xiphias gladius*)

### Patagonian toothfish or Chilean sea bass (*Dissostichus spp.*)

Patagonian toothfish is better known as Chilean sea bass. It is a large demersal, predatory species that reaches

two metres in length. This fish is highly valued in restaurants, with its main markets in Japan, United States, Canada and Europe. Because of its high-fat content, the fish deteriorates easily, making it difficult to purchase fresh Patagonian toothfish in Europe. It is traded as a frozen product that can be pan fried, grilled or steamed.

While there are two main types of Patagonian toothfish: *Dissostichus eleginoides* and *Dissostichus mawsoni*, the trade codes do not separate these two species. However, Patagonian toothfish exported to Europe are mostly from the family of *Dissostichus eleginoides*, which are found in the South Atlantic, Pacific and Indian Oceans. Its other relative, the *Dissostichus mawsoni* is usually found on the Antarctic shelf.

Patagonian toothfish is exported to Europe under the following HS codes:

- HS 030283 – Fresh or chilled toothfish (*Dissostichus* spp.)
- HS 030383 – Frozen toothfish (*Dissostichus* spp.)

## **Mahi mahi (*Coryphaena hippurus*)**

With a range of different colours, mahi mahi, also known as common dolphinfish or *dorado* in Spanish, is a deep-water fish known for its speed and agility. They are commercially caught using troll lines and longlines or as by-catch from other fisheries, such as tuna or swordfish. They are very desirable and popular for sports fishing because of their unique look and size.

Mahi mahi are usually sold to Europe in frozen fillets, being most popular in Western and Eastern Europe.

As mahi mahi is usually caught as by-catch of the tuna and swordfish fisheries, it does not have its own HS code and falls under a generic code for frozen fish fillets (HS 030489), making it difficult to track the trade data for this species.

## **Butterfish (*Lepidocybium flavobrunneum*)**

Also popularly known as escolar, butterfish is mainly sold to Europe in fillets. This fish has been the subject of controversy and health warnings because of its laxative properties caused by wax esters or non-digestible fats. It is caught at great depths as a by-catch of tuna fishing.

Like mahi mahi, there is also no official trade data for butterfish, which is only traded under the generic HS code HS 030489.

## **2. What makes Europe an interesting market for tuna by-catch species?**

Europe has a huge market for fish and seafood. While the tuna by-catch species are niche products, they have an established market with little competition and some species' market presence is growing. A lot of these fish are sourced from third countries, so by understanding how the market and the supply chain work, you can get your product to the right buyers.

### **Huge seafood business in Europe**

The CBI market analysis report for fish and seafood in Europe shows that [Europeans have a huge appetite for fish](#). Europe's which has more than 500 million consumers, seafood consumption has reached 22.1 kg per capita, making it above the world's average.

Six of the top ten fish and seafood markets in the world are European countries, [according to the Agriculture and Agri-food Canada](#). Spain imports €7.87 billion worth of fish and seafood, making it the fourth largest market in the world after the United States, Japan and China. France ranks fifth at €6.5 billion, followed by Italy with €6.4 billion, Germany (€5.4 billion), Sweden (€5 billion) and the United Kingdom (€4.1 billion).

Tuna is the most consumed marine species in Europe, [according to the European Market Observatory for Fisheries and Aquaculture Products \(EUMOFA\)](#). The same EUMOFA study shows that the 2.88 kg per capita consumption of the commodity group 'tuna and tuna-like species' in 2016 included 96% tuna and 4% swordfish. Of the four by-catch species, swordfish is currently the most consumed and therefore offers you the most opportunity. Patagonian toothfish consumption, however, is growing and mahi mahi and butterfish have their own niche markets.

It is important to note that Europe has its own swordfish fisheries, mainly stretching from the Mediterranean and the Atlantic, to the Indian Ocean and the Pacific. This fish is among the top ten caught in Europe, in terms of value. In 2016, it grew by 4% in value and 5% in volume, reaching €194 million and 30.232 tonnes.

## **Understanding European market trade flows**

To put things in perspective, we should first analyse how big the overall market is, then distinguish further between imports coming from within Europe and those supplied by non-European countries. It is worthwhile to note that Spain is the largest producer of swordfish in Europe, producing 22,676 tonnes in 2017, followed by Italy and Portugal. However, due to pressure on stocks, overall production of swordfish has dropped by 20% since 2011. This offers you an opportunity to fill Europe's demand, particularly in the frozen category.

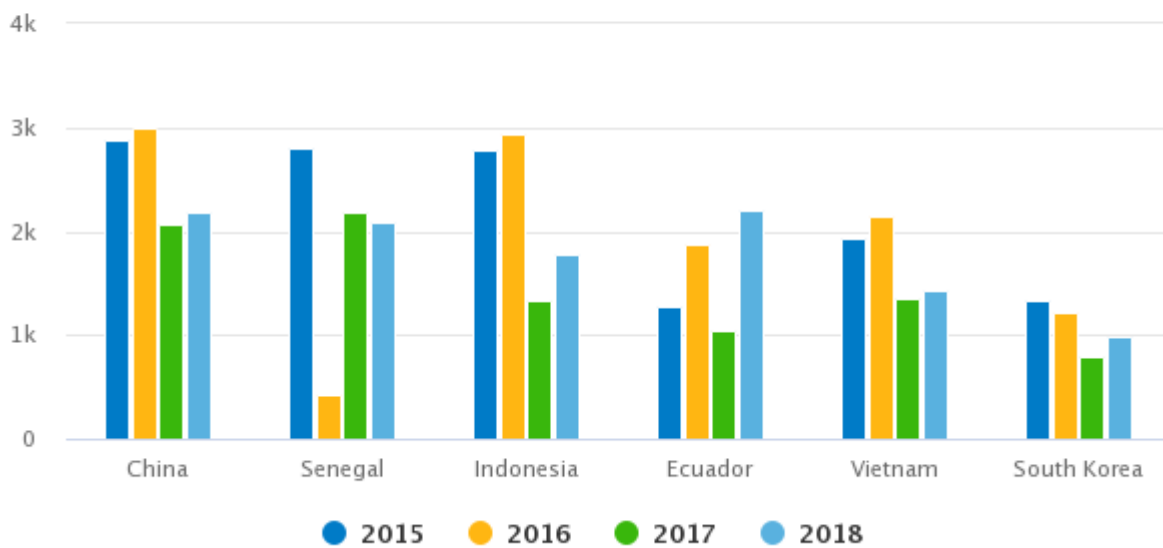
For frozen swordfish, total imports have reached almost 30,732 tonnes in 2018, 5.83% higher than the previous year. 46% is supplied by non-European countries, amounting to 14,111 tonnes in 2018. More than half of the total imports of European countries are supplied by major fish-producing nations within Europe, such as Spain (8,028 tonnes) and Portugal (6,794 tonnes).

The biggest importers from non-European countries of frozen swordfish are Portugal (6,316 tonnes), Italy (3,762 tonnes) and Spain (2,130 tonnes). These countries have shown an increase in deliveries in 2018; Spain's imports increased by 65.18%, a recovery since imports fell 2017 due to a crackdown on products connected to illegal, unreported, and unregulated (IUU) fishing from third suppliers. China is the leading non-European exporter at 2,182 tonnes, followed by Senegal (2,080 tonnes), Ecuador (2,206 tonnes) and Indonesia (1,782 tonnes).

[IUU fishing, according to the European Union](#), is any fishing that is in forbidden areas, uses illegal methods or goes unreported. IUU fishing has a negative effect on the sustainable management of global (and local) fish stocks and creates unfair competition against those that fish legally and responsibly.

The current frozen swordfish market in Europe is still in recovery after Spain detected illegal swordfish entering from Indonesia and Vietnam. In the short term, any increase in imports will be slow, but may steadily increase in the long term.

**Figure 1: Top 6 non-European suppliers of frozen swordfish to Europe**  
in tonnes

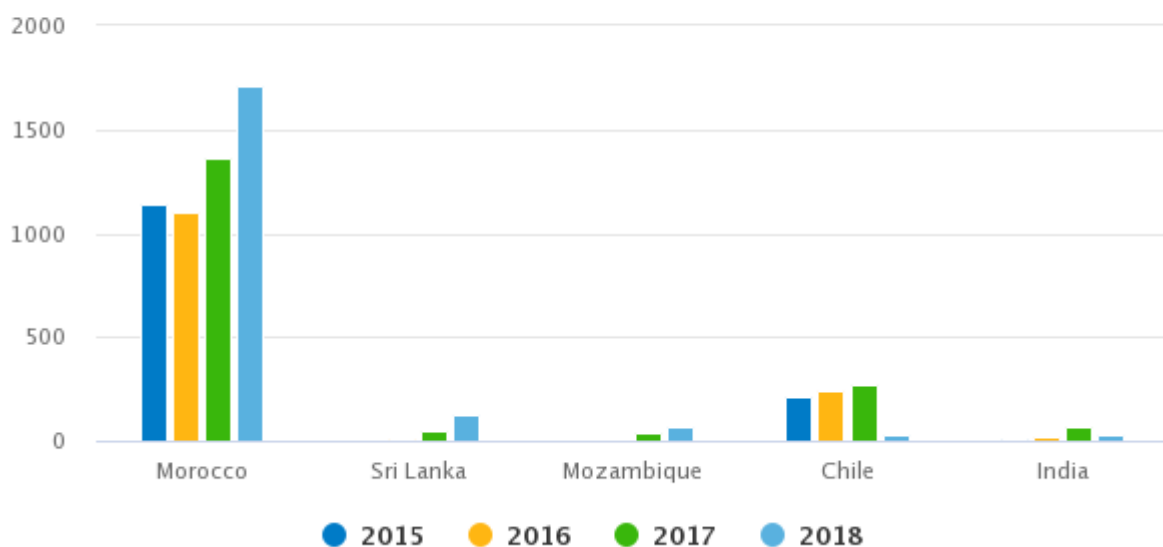


Source: Trademap (2019)

Europe's total imports of fresh or chilled swordfish have declined, dropping to 8,700 tonnes in 2018, 11% less than deliveries in 2017. Unlike the frozen swordfish segment, in which non-European countries have a stronger grip in the market, the fresh and chilled segment is dominated by European suppliers like Spain, Portugal and Greece.

Among the fresh and chilled segment, non-European suppliers make up only 23% of the total imports of this segment. Among non-European suppliers, Morocco is the leading exporter of fresh and chilled swordfish to Europe, covering 85% of the supplies being delivered to Europe. Other main exporters include Sri Lanka (6%), Mozambique (3%), India (1.6%) and Chile (1.5%).

**Figure 2: Top 5 non-European suppliers of fresh swordfish to Europe**  
in tonnes



Source: Trademap (2019)

### Tip:

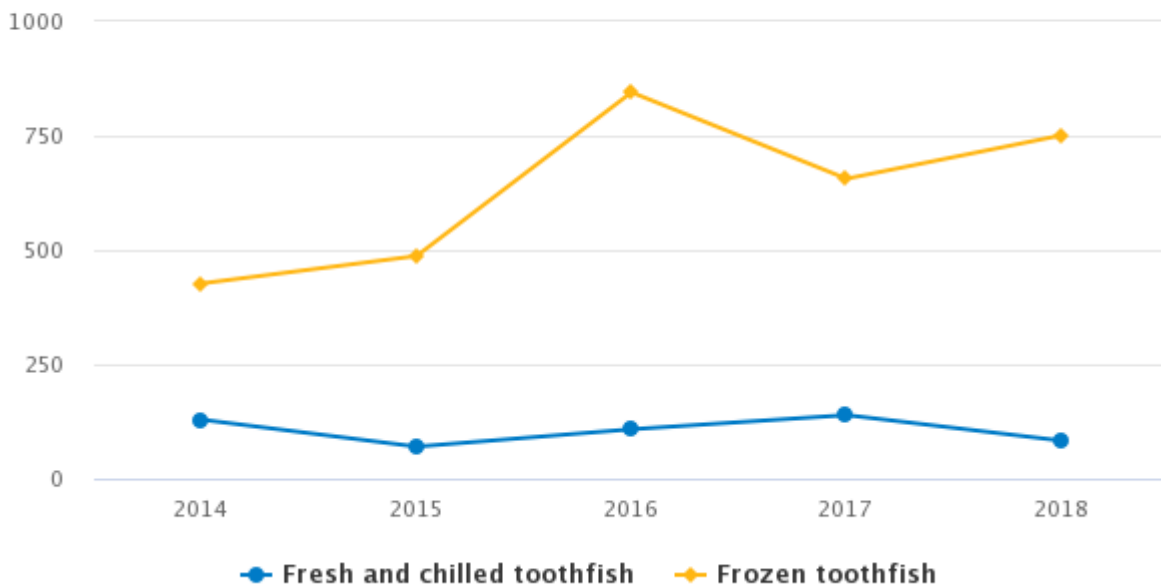
Remember that Europe's demand is mostly focused on frozen swordfish, rather than fresh ones, if you are looking into entering the swordfish market should. There is also more opportunity to enter the frozen segment since the volumes exported into Europe are divided among several non-European players, unlike in fresh swordfish which is mostly controlled by Morocco.

Be sure to secure proper documentation for all your products before attempting to export to Europe; European authorities are eager to deter IUU fishing. For fresh and chilled toothfish, there is only a minor market in Europe, with only a total of 83 tonnes imported mostly to Belgium (28 tonnes), Bulgaria (24 tonnes), Italy (11 tonnes) and Greece (9 tonnes).

In the long term, however, exporters looking to enter the European market for toothfish should focus on the frozen toothfish category where European consumption has been showing an increasing appetite since 2014. In fact, imports to Europe have almost doubled (427 tonnes to 751 tonnes) from 2014 to 2018. Most of the imports coming into Europe are dominated by French suppliers, but with increasing demand, non-European suppliers can potentially tap into this market.

Figure 3: Imports of fresh & chilled and frozen toothfish

in tonnes



Source: Trademap (2019)

## European demand for mahi mahi and butterfish

Most mahi mahi is imported in frozen fillets from China, Vietnam and Indonesia. Chinese exports are usually 'double frozen' while Vietnamese and Indonesia supplies are produced 'single frozen', so they are considered to be of higher quality. Chinese products also have the reputation of often being treated with additives. There is some supply of fresh and chilled mahi mahi from South America, but these supplies are very unstable.

Double frozen fish is generally frozen whole, thawed for processing and then refrozen before being sold to the end consumer. Double frozen are perceived to be of low quality due to the multiple freezing processes that affect its freshness.

Mahi mahi is usually imported by Southern European and Eastern European markets for very niche markets, such as ethnic grocers, and it is usually of low quality. The European ethnic market is a good market for exporters to explore, considering the growing multicultural and diverse population of Europe. This is a useful trend to monitor in the long term, as European society becomes more exposed to multiculturalism and consumers pay more attention to new products and cuisines that come in this process. This trend could bring niche products into the mainstream.

While there is no official data for butterfish, there is some demand for both frozen fillets and smoked butterfish in the Netherlands, where it is sold as butter mackerel or as escolar in fillet steaks of 180 g to 250 g.

### Tips:

Check these Dutch importers if you want to export butterfish to the Netherlands: [Mooijer Volendam BV](#), [Amacore BV](#), [Affish BV](#), [Maxima Seafood](#), [Platvis Holland](#).

Read [the CBI study on exporting fish and seafood to the European ethnic retail channels](#).

### 3. Which European countries offer most opportunities for tuna by-catch species?

The Southern European market for tuna by-catch species, like with seafood in general, is the largest market in Europe — this is particularly the case for swordfish. You will, however, face competition from other non-EU as well as European companies. European tuna fleets bring in by-catch species but some companies have fleets that target tuna by-catch species specifically. The increased focus on IUU fishing and fisheries management can help you become a preferred supplier to the European market if you can provide sustainable and consistent product.

#### Spain favours fresh and chilled fish

Spain was 2018's second largest European importer of frozen swordfish at 8,973 tonnes, after Italy, which imported 11,268 tonnes in the same year. Volumes have slightly dropped (-9%) since 2017 when the HS code 030357 was subdivided into the frozen fish body and the frozen fish fins, heads and tails.

Most of the frozen swordfish comes from Portugal (68%) and Ecuador (17%). Some small volumes are sourced from the United Kingdom, Belgium, Chile, Panama and Morocco. Most of these volumes (7,901 tonnes) are reexported to other European countries, particularly Italy (6,181 tonnes) and Portugal (1,221 tonnes).

However, Spain leads in the imports of fresh and chilled swordfish at 4,124 tonnes, accounting for 44% of total imports sourced from non-European countries. Volumes increased by 36% from 2015 to 2018.

#### Tips:

Spain's processed seafood market is usually dominated by private label products. The top player is [Grupo Calvo](#), followed by [Bolton](#), [Hijos de Carlos Albo SA](#), [JEALSA](#), [Ubago](#), [Grupo Nueva Pescanova](#) and [FRINSA](#).

Check out importers such as [Seamax Global](#) for selling mahi mahi.

Consider hiring a Spanish-speaking translator or mediator to communicate effectively with Spanish companies.

#### Italy consumes lots of swordfish

Italy was the largest European importer of frozen swordfish in 2018 at 11,268 tonnes. Italian imports of swordfish have jumped by 18% since 2014 with most deliveries coming from within Europe, particularly Spain (52%). China is the second largest exporter to Italy at 1,597 tonnes, growing immensely since 2014, when it delivered just 305 tonnes to Italy.

Indonesia was Italy's second largest exporter of frozen swordfish, but has seen its market share diminish considerably (by 71%) since 2014. This decrease is mostly the result of stringent import controls imposed on Indonesia after the European Union detected fraudulent catch certificates linked to IUU fishing.

In fresh and chilled swordfish total imports, Italy came in second in Europe in 2018, following Spain. Most deliveries, however, are sourced from within Europe, as only 2% of imports come from non-European countries. For exporters looking to enter this market, that is not necessarily a bad thing. Trade data shows that imports from non-EU suppliers have more than tripled in volume since 2015, growing 334%.

## Tip:

If you are looking to do business with Italy, check the country's largest fish company, [Bolton Group](#).

## Portugal: the biggest European re-exporter

Portugal imported a total of 8,108 tonnes of frozen swordfish in 2018, sourced mostly from Indonesia (1,425 tonnes), Vietnam (1,164 tonnes) and Panama (722 tonnes). Portugal is also the biggest European importer of frozen swordfish from non-European countries at 6,136 tonnes, more than Italy and Spain, the two biggest overall importers of this product in Europe.

Interestingly enough, Portugal also re-exports a huge volume to other European countries at a total of 7,290 tonnes, mostly sent to Spain (6,609 tonnes) and Italy (626 tonnes) in 2018.

Trade flows between European countries suggest that Portugal may have been used as an alternative entry point to the EU to deliver frozen swordfish to Spain and Italy between 2010 and 2015, following those two countries' increased verification requests of IUU-fished swordfish from Indonesia and Panama, according to [a report by Oceana](#). Once the product enters the European single market, authorities generally have difficulty tracking the origin of the product.

## Tips:

To better understand the impact of European Union IUU regulation on seafood trade flows, check [this report](#) from environmental organisation Oceana in partnership with PEW and the Environmental Justice Foundation.

Portugal's high imports from non-European countries presents an opportunity, if you are looking to enter the European market for swordfish. Portuguese seafood companies for processed seafood, including chilled and frozen, that are worth looking at include [Cofaco](#), [Ramirez](#), [Coresa Conserveiros Reunidos](#), [Vasco da Gama](#) and [Pescanova](#).

## France's steady demand

France has shown as steady appetite for frozen toothfish in the last five years, importing 293 tonnes of it in 2018. Almost 91% (268 tonnes) of these deliveries come from the French Southern and Antarctic Lands, a French overseas territory in the southern Indian Ocean, while only 6% come from one non-European country, Mauritius.

It must be noted that France has its own MSC-certified toothfish fishery in the southern Indian Ocean. However, these fisheries are focused on conserving resources and producing high-quality toothfish, where fishers strive to actively preserve the stock. Some of the companies that fish toothfish include [Sapmer](#) and [Cap Bourbon](#).

Toothfish is a valued product in France, mostly sold in high-end restaurants and retailers. It is prized for its delicate taste and unique texture. This is also why French toothfish fishers consider the toothfish as one of the most sought-after fish in the market.

As toothfish appeals to a more sophisticated market in high-end French cuisines, steady demand for this product is expected. The French market shows promising demand for toothfish, but French fishers dominate the market, leaving little room for non-European exporters to enter the market.



### Tip:

Contact an importer or trader to enter this market to ensure you get the right connections to the processing companies. Quality and sustainability are what the French buyers are looking for. It is difficult to enter such a closed market but if your product is MSC-certified and IUU-free, you may have a chance.

## One to watch: UK demand for toothfish is growing fast

Exporters wishing to export frozen toothfish to the United Kingdom must know that British demand for frozen toothfish skyrocketed from just 31 tonnes in 2014 to 179 tonnes in 2018. France has dominated 100% of these exports to the UK since 2017.

British chilled toothfish import values have increased 193.4% since 2009, reaching €72.5 million in 2019, according to [data from Seafish](#), a British seafood industry support body. According to Seafish, toothfish has been a top performer in the past years and will continue to grow in the long term. Exporters may look into joining this trend and start selling to the United Kingdom.

The United Kingdom also imports some frozen swordfish from outside Europe. From 2015 to 2018, imports have grown by 8%, reaching 9.5 tonnes in 2018.

Much like in France, Patagonian toothfish is big on the food scene in the United Kingdom, where it is marketed as Chilean sea bass. In fact, it is one of the most popular fish in the country, usually promoted by celebrity chefs as well as major retailers.

### Tips:

Study the movement of trends in the [digital publications from Seafish](#).

Check out retailers such as [Tesco](#), [Asda](#), [Sainsbury's](#) and [Morrisons](#) which promote toothfish as an alternative to Britain's traditional fish favourites, like tuna and cod.

Stay informed on trade news and updates, particularly [about Brexit](#). As the United Kingdom mostly imports fish from neighbouring European countries, leaving the European Union may affect its imports. This may be a good opportunity to start contacting British traders and importers to sell your product.

## Eastern Europe and Bulgaria's growing demand

Bulgaria, the third largest importer of frozen toothfish in Europe at 58 tonnes in 2018, sourced most of its toothfish imports from Lithuania, showing steady increase in imports since 2016. Bulgaria also imported 24 tonnes of fresh and chilled toothfish in 2018. Consumption of fish is growing across Eastern Europe because of rising health awareness among consumers. While Eastern European countries may be small markets now, they show promising growth in the long term, as more processors explore the sector's profitability.

Poland has also shown some appetite for frozen toothfish, reaching a peak of 107 tonnes delivered in 2015, but dropping to 36 tonnes in 2018. Poland's processing sector now plays a major role in processing fish products after going through a considerable transformation since the country joined the European Union in 2004. Polish

buyers usually source their seafood from South America, in particular from Chile.

These random peaks from Eastern European countries could have been influenced by trade flows within Europe and the consequence of stricter enforcement of catch certificates verification in Spain and Italy, after reports of frozen toothfish linked to IUU fishing, particularly from Asian countries such as Taiwan and Indonesia. Eastern European countries are not traditional big seafood importers.

### Tip:

If you are looking to tap into Poland's seafood import market, check out the [WorldFood Warsaw](#) exhibition where thousands of traders, buyers, suppliers and distributors congregate. Make sure your products have all the right certifications and safety labels. Most processing companies in Eastern Europe, particularly in Poland, are run by families and they do not want their family names associated with illegal products.

## 4. Which trends offer opportunities in the European tuna by-catch species market?

It is important to understand the different trends affecting markets because they provide information of what the market wants, including insights into what buyers find important. A trend may, for example, become a mandatory requirement in the future or a licence to do business. In this study, we look at some trends that have significant influence on market access, now and in the future: sustainability, storytelling, mislabelling, catch quotas and the consumer's perspective on frozen fish versus fresh fish.

### Sustainability is key

After a long history of overfishing and illegal fishing activities resulting in a significant campaign against restaurants selling illegal fish, the Patagonian toothfish is back on the menu thanks to many fisheries becoming MSC certified. Measures such as at-sea labelling, supply chain monitoring and DNA testing have helped restore consumer confidence in toothfish, according to MSC.

Patagonian toothfish reproduce and grow slowly, making them vulnerable to overfishing. By the late 1990s, fishing boomed but so did IUU fishing. Global stocks of Patagonian toothfish started collapsing, forcing the industry to start collectively addressing the problem through sustainable management.

In 2004, the tide began to turn after [the first fishery was certified by MSC in South Georgia](#). More fisheries became certified in the coming years and [by 2017 approximately 70% of the global Patagonian toothfish was certified](#). Of the MSC-certified toothfish, approximately half is caught by French-flagged vessels, 25% by Australian-flagged vessels, 15% by UK vessels and 10% from Falkland Island vessels, according to Fishchoice.

Patagonian toothfish is traded under different names, which can potentially lead to confusion and misclassification. There is also lack of species-specific trade codes among trading countries, resulting in toothfish products being traded under generic fish codes. In Europe, for example, there are discrepancies in terms of HS codes from 2003 to 2006 and from 2007 onwards.

Dubbed the 'white gold' of fish, there is a big opportunity in exporting Patagonian toothfish, considering its high commercial value. However, European buyers are very discerning on how sustainable the product is.

In relation to swordfish, another species recovering from bad reputation caused by IUU fishing in the early 2000s, demand has been gradually improving, particularly in Spain and Italy. Several fisheries targeting

swordfish have since been certified by MSC, especially in the United States, Canada and Australia. In Europe, the North and South Atlantic Spanish longline fishery applied for MSC assessment in 2014, but withdrew from the process in 2017.

Indonesia is an example of developing country that has shown improvement in meeting European buyers' sustainability requirements. Indonesia's longline pelagic fisheries are usually associated with IUU fishing, which contributed to decrease its swordfish exports to Europe. As Indonesia's swordfish catches increased, a fishery improvement project (FIP) was started in 2013 to ensure sustainability and traceability of swordfish fisheries. Check [PT Intimas Surya](#), a seafood processor in Indonesia, which is active in the FIP.

The trend of sustainability is here to stay, as Europe actively pushes for traceability and responsible fishing as a way of improving stocks and preventing IUU fishing.

### Tip:

Check [the MSC website](#) to verify which suppliers are already certified.

## Stories matter

Compared to swordfish, Patagonian toothfish is imported into Europe in smaller volumes. However, there is a huge potential in increasing demand as shown in the rise of imports, particularly in the frozen segment category.

Back in 2002, Patagonian toothfish was so popular it was being overfished to the point of threatening the species, leading to campaigns to discourage consumption, such as the 'Take a Pass on Chilean Sea Bass' campaign in the United States. Since then, efforts made to ensure sustainability coupled with the right mix of storytelling and marketing have changed American consumers' perception of the fish and started buying it again.

The Patagonian toothfish was originally known as a cheap by-catch, but marketing it as an exotic, melt-in-your-mouth fish called Chilean sea bass also helped to rebuild its reputation. Today, the Patagonian toothfish is considered a premium fish, particularly among US consumers, fetching almost €18 for a 230 g portion, [according to Seafood Source](#).

Given the right branding, as well as the necessary efforts to maintain its sustainability, the demand for Patagonian toothfish also has the potential to grow in Europe, particularly in France, United Kingdom, Bulgaria and Spain, where it has already shown growth.

For exporters looking to enter Europe's toothfish market, it is important to promote the story behind your catches, what the supply chain looks like and the fish's health benefits. For example, [the website of Sapmer](#), a French fishing company also operating in Mauritius, highlights the sustainability efforts of the company in how they catch toothfish as well as the numerous nutritional benefits of the fish.

Buyers and consumers alike are becoming increasingly involved and conscious about their purchases, whether in processing, wholesale or retail. Therefore, adding a human element or a personalised storytelling take about your product can be a good way to promote your fish. In the short term, this means that you must highlight sustainability and improvements in the supply chain or in the working conditions of your fisheries.

## Tip:

Read [the CBI trends study](#) for a better understanding of the opportunities and possibilities of using storytelling and marketing to improve your market position.

## Beware the mercury

In 2018, the European Environment Agency (EEA) [published a report](#) about the significant risk of mercury pollution in oceans, where it takes a highly toxic form that is absorbed by fish. For example, public health authorities in some EU countries have advised against consuming swordfish, particularly for pregnant women and children because of its high metal content.

According to the European Commission, fish meat is the main contributor to methylmercury eaten by the European public, for all age classes, followed by fish products. Mercury content varies widely among fish species, but is higher in general in larger predatory fish, such as swordfish and mahi mahi. Each species has a maximum level of metal content set by the European Union — swordfish's, for example, is 0.30 mg per kg.

Europe has strict compliance rules against mercury contamination in fish. As a potential exporter, make sure your product is not contaminated.

## Tips:

Check the [Rapid Alert Notifications \(RASFF\) portal](#) for products which are high on alert of European authorities because of mercury contamination. You can also check the product's origin and the actions taken.

To check what is the maximum allowed level of metal content in any fish, see [this regulation set](#) of the European Commission.

## Be transparent in labelling

Butterfish can often be mislabelled, according to a recent [seafood fraud report undertaken by Oceana in Canada](#). It is often labelled as 'white tuna' or 'white tuna albacore'. Europe has strict regulations in terms of mislabelling and exporters looking to sell this product must comply with requirements.

Oceana also highlights that mislabelling can be especially harmful to health, regardless of whether the mislabelling happened because of intentional fraud or ignorance. Public health authorities in several European countries, including Italy, Sweden and Denmark, have warnings on butterfish, which is non-toxic and non-lethal, but may cause some adverse effects depending on the person.

Exporters must note that butterfish is traded under several names, making it hard to track in the market. It is commonly known as escolar but it is also traded as butterfish or oilfish. Exporters must be 100% sure of the species being sold and must be transparent at all times regarding the labelling requirements.

## Tip:

Check [this pocket guide](#) to learn more about Europe's label requirements for fish and aquaculture consumer labels.

## Watch out for quotas

European leaders have been looking into use quotas more widely to improve swordfish stocks, which were severely hit by overfishing. A proposed total allowable catch quota, however, has been blocked by pressure from European fishing powerhouses, Italy and Spain, which were joined by Malta, whose fishers rely on swordfish catches for livelihood.

As part of the recovery plan for swordfish, the International Convention for the Conservation of Atlantic Tunas [allocated a quota of 7,118 tonnes for Europe in 2018](#), slightly smaller than the 7,400 tonnes assigned in 2017. For exporters, reductions in the fishing quota can present opportunities for third suppliers to enter the market.

## Frozen fish time

Seafood is an important part of European population diet. While fresh products still dominate the market, particularly in Southern Europe, frozen products have also been performing well. Southern European countries are known for their huge consumption of fresh fish, while Northern European markets usually want processed fish.


However, [Spanish and Italian buyers are also now importing more frozen fish](#), particularly swordfish and toothfish. In Spain, for example, frozen products are still the smallest category within processed fish and seafood, but it has been performing well. One of the reasons behind this shift, according to the Trade Commissioner service in Spain, [as quoted by Agriculture and Agri-Food Canada](#), in addition to the convenience and ease of preparation of frozen foods, is a local regulation requiring any fish served raw or almost raw (smoked, marinated, etc.) has to be frozen for at least 24 hours before being served.

As consumers seek more convenience and seek fish as a healthy source of protein, the trend favouring frozen fish can be expected to continue in medium and long terms.


The study has been carried out on behalf of CBI by [Seafood Trade Intelligence Portal](#).

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