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Headed and Gutted: exposing the role of European states, big business and the Russian mafia in illegal cod fishing in the Barents Sea

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An increasing amount of cod from the Barents Sea has been delivered directly to EU harbors over the last few years. It now appears that a significant proportion of this fish may be the result of illegal and unregistered over-fishing, and involve interests as diverse as the Russian fish mafia and Western capital. Corruption, exploitation of poor fish workers, indifferent fish companies that only seek cheap fish, and a lack of coherent sanction and control measures from both Russia and the governments of EU Member States all seem to play a role. Such fishing is illegal, and represents a significant environmental, economic and social problem all over the world.

1. Companies trading in illegally fished cod

Swedish TV4 exposed that the fish product company **Findus** among others have allegedly bought cod from the Barents Sea fished by vessels that deliberately over-fished their legal annual quotas¹. According to Swedish TV4, Findus has bought this illegally caught cod from fish trading agents, including the Danish based company **Kangamiut**. The exposé further alleges that Kangamiut bought several loads of cod that was landed in EU harbors by flag of convenience-flagged reefer ships² that transshipped the cod from Russian trawlers fishing illegally in the Barents Sea. Findus also cooperates with the China-based company **Pacific Andes**, by letting this company buy fish on its behalf from companies like Kangamiut, and process it at their plants in China, before re-exporting it to Europe. Pacific Andes is one of the world's biggest fish and seafood companies. In 2002, Pacific Andes was identified by the Coalition of Legal Toothfish Operators as having strong links to illegal fishing operations in the Southern Ocean³. The German based supermarket chain **Lidl** also sources their cod fillets and several other types of fish through Pacific Andes, and seems therefore currently unable to guarantee that their cod is legally caught as part of legal quotas.

In addition to Findus cod products, these revelations suggest that cod products like **Euroshopper** fish fingers, **Coop Xtra** fish fingers, frozen cod fillets from **Lidl**, and **McDonalds** cod fish finger products (sold at least in Norway, Finland and Germany) could contain illegally caught cod. The fish fingers for all of these brands are produced at the Danish factory **Espersen**. Espersen has confirmed to both ICA and Intrafish⁴ that they have bought Barents cod from the trading companies Kangamiut and **Ocean Trawlers**, and that they had not requested any additional guarantees that this cod was caught as part of legal quotas other than that it has been inspected and counted by Danish authorities. According to a statement by Espersen to Intrafish, Danish authorities check veterinary status of the fish and report the landed volumes to the EU for statistical purposes, but do not control which

¹ Swedish documentary Kalla Fakta 18.1.2006: <http://www.tv4.se/nyheter/kallafakta> Findus has now broken the contacts to Kangamiut, and are revising their purchasing policies.

² Reefers (refrigerated cargo ships) receive frozen fish and fish meal products directly from fishing vessels during ship-to-ship high seas transshipment operations and deliver their products to markets. The reefer vessels also deliver provisions and supplies directly to the fishing fleet.

³ http://www.colto.org/Case_Study.htm

⁴ <http://www.intrafish.no/global/news/article99680.ece>

quotas the cod has been caught from, or whether the landed fish is subtracted from this quota or not⁵. According to The Guardian⁶, **Unilever** also buys cod from Ocean Trawlers and say they “cannot control its ultimate suppliers”.

⁵ <http://www.intrafish.no/global/news/article99755.ece>

⁶ <http://www.guardian.co.uk/fish/story/0,,1713525,00.html?qsrc=rss>

To date, all the companies Greenpeace Nordic has spoken with over their involvement in this developing illegal cod story: McDonalds, Lidl, ICA, Coop, Royal Greenland and Unilever are currently working to check and double check their fish deliveries from these sources, through the EU-instituted traceability requirements. This keeps suppliers like Kangamiut, Ocean Trawlers and others busy, as well as processing companies like Danish Espersen. Pacific Andes fills both roles and seems to be busy answering audits from Findus as well as Lidl and their fish supplier German **Copack/Frosta**. Greenpeace looks forward to detailed information from these internal investigations, which Lidl, McDonalds, ICA and Coop have all said they will provide with minimum delay. All companies also emphasize that they do not accept to sell illegal fish. The reality of the statements remains to be seen⁷.

It is already clear that none of these companies, and actually very few others in the business, seem to have a clear policy in place to ensure that they are **not** buying illegally fished cod. Such policy is essential to avoid illegal cod, and must be established. Ignorance is no longer an excuse.

According to an explanation given by Magnus Roth, one of the owners of Ocean Trawlers, to Swedish TV4:

"We do not trade in illegal fish. But the problem is, that when you receive a cod cargo in Europe, you cannot see if this load is illegally taken or not. You have to trust that the accompanying Russian documents are correct. And this is equal for all fish traders [that buy cod landed in EU harbours]".

This is the problem in a nutshell, precisely described by one of those who seem to know the system and the loopholes best.

In addition, it seems that **Ocean Trawlers** may be more active than this. The information available from a number of sources, including a prize-winning Norwegian TV documentary NRK Brennpunkt as well as Swedish TV4 documentary Kalla Fakta⁸, indicates that they seem to hire convenience flagged transport ships that tranship cod illegally from Russian trawlers and deliver this to EU harbours with insufficient control routines. Also, Ocean Trawlers seem to co-manage several of the trawlers they buy illegal cod from. According to Russian sources shown by Swedish TV4, many of these other vessels have delivery contracts with Ocean Trawlers to supply agreed volumes of cod in exchange for payments made by Ocean Trawlers prior to the fishing activities⁹. Such a system would ensure that the company was in control of large volumes of fish. It takes some effort to become the worlds largest cod supplier.

Therefore, Greenpeace advises all fish trading companies that really want to ensure they do not buy illegally caught cod only buy cod that has been landed in Norwegian or Icelandic harbors. It appears that several companies have so far refused to follow this basic precautionary purchasing principle. Turning a blind eye to the source of the cod that they are buying helps make illegal cod fishing a profitable business, and paves the way for illegally caught cod to end up packaged in the boxes of major brands around the world. These companies need to develop clear and transparent safeguards or other comprehensive systems to ensure that no illegally caught cod may land up on our supermarket shelves.

Our oceans are faced with a critical situation. Over 70% of commercial fish stocks are fully exploited, over exploited or depleted. This should be well known to the fishing industry, including companies who sell fish and fish products. To win back consumer support, such

⁷ Frosta/Copack has provided information about some of their cod supply, and will in the future only use cod landed in Norway and Iceland, and not buy from vessels blacklisted by Norway.

<http://www.intrafish.no/global/news/article101106.ece>

⁸ www.nrk.no/programmer/tv/brennpunkt/4100216.html, <http://www.tv4.se/nyheter/kallafakta/438576.html>

⁹ Ocean Trawlers dispute all these claims, and says they have "not used" convenience-flagged transport vessels since January 2005 (when this finally became illegal). However, they have so far not agreed to reveal any of their traceability information about which vessels and harbors they have received cod from. Ocean Trawler has also offered to cooperate to combat IUU fishing. (Email-correspondence Robert Ekblom February 20 and March 3 2006).

companies must adopt a seafood policy that ensures they do not get involved in the trade in illegally caught fish, fish species from threatened populations or any seafood product that is caught as a result of destructive fishing practices such as high seas bottom trawling.

Greenpeace demands that fish companies and retailers commit to:

- Provide a legal fish guarantee for all their fish products and ensure that no fish come from depleted or unsustainably managed stocks¹⁰
- Develop a comprehensive system to ensure full transparency and traceability for all their fish products, including a system to actively prove and determine that their fish is not part of any illegal and unreported catches. This may take some time to develop, but is necessary as long as Government control is inadequate.
- Stop any trading or cooperation with fish companies involved in trade with illegal cod
- As an immediate measure, only buy cod that has been landed in Norway or Iceland.
- Never buy fish that has been taken by blacklisted trawlers or transported by reefer vessels flying flags of convenience. Alternatively, they can stop using cod until a better legal fish guarantee can be presented.

Pirate fishing for cod and other fish species will not be stopped totally by the individual actions of Findus or other companies alone. Governments must work together to adopt and implement concrete measures to combat pirate fishing too. However, companies should be taking the lead in being responsible for ensuring that their own operations do not facilitate or aid this illegal trade, is an important beginning. Greenpeace has seen similar situations around the issue of illegally logged timber.

2. Over-fishing, including illegal, unreported and unregulated fishing in the Barents and globally

Over-fishing represents a serious threat to marine life and fish stocks in many parts of the world's oceans. In addition, illegal and unreported fishing is equal to stealing fish from others that have legal rights to fish it. The UN Food and Agricultural Organization (FAO) estimates that illegal, unreported and unregulated fishing amounts to as much as 30% of total catch in several important fisheries globally, possibly much more in some fisheries. Such pirate fisheries globally are estimated of costing around 3.36 billion EUROS in lost revenue each year.¹¹ Various estimates for Pirate fishing in the Barents Sea cod fishery lie within the 30% range and within the 40% range for cod landed from the Baltic Sea.

In addition to pirate fishing that takes a higher toll on fish stocks already under heavy fishing pressure, fishing also harms the oceans through the use of destructive fishing practices. High seas bottom trawling is particularly destructive in that it destroys vulnerable deep-sea bottom habitats, such as coldwater corals and is associated with high degrees of by-catch and discards.

In 2001, the FAO adopted an international plan of action to combat illegal, unreported and unregulated fishing (IPOA-IUU). It is a voluntary agreement that calls on countries to tackle this important issue. At the World Summit on Sustainable Development in 2002, the world leaders committed to implement the FOA IPOA-IUU and *eliminate* IUU¹² fishing by 2004. Despite this high-level attention, little, if any, effective measures have been taken to eliminate IUU fishing. Too often, the European Community – through its member states – is implicated in the activities of pirate fishers.

¹⁰ The EU Traceability Directive EC 178/2002 is already requiring these companies to have access to all information about fish they sell, down to region, method and catching vessel. This is thus a question of using available information to ensure legal and sustainable products.

¹¹ MRAG: Review of IUU fishing and developing countries: Synthesis report, June 2005

¹² IUU fishing: Illegal, Unreported and Unregulated fishing

Throughout 2004 and 2005, Greenpeace observed and documented pirate fishers flouting international rules where they exist and fishing with impunity where they do not. Current measures to combat pirate fishing in particular on the high seas have clearly not been sufficient¹³.

As a result of the collapse in the Baltic, North Sea and Canadian cod stocks due to massive over-fishing, almost all cod on the international market is currently fished in the Barents Sea on Icelandic, Russian or Norwegian quotas. For 2005, Russia's entire legal quota for Barents cod was 200.000 tons of cod. According to analyses made by the Norwegian Fisheries Directorate, a minimum estimate of additional 100.000 tons of cod from the Barents Sea was delivered to the European market, illegally caught without proper registration and without being subtracted from the legal quotas. Volumes in the same order of magnitude were delivered outside the legal quotas directly to the EU also in 2002, 2003 and 2004¹⁴. This means that a minimum of every third cod from Russian trawlers is illegally caught. Strong safeguards are thus needed to avoid this large volume of fish.

Illegal cod from the Barents Sea is often landed in EU ports, either by the trawlers themselves or via dedicated freezer ships, to avoid inspection and quota controls in Russia or Norway. This is a common way to get illegally taken fish away from the fishing grounds and is also used in Asia, along Africa and the Southern Ocean. The way to avoid registration of caught fish is to keep double catch diaries and avoid reporting transshipments at sea. Through this system, a vessel may be in compliance under inspection, but later conduct an unregistered transshipment and restart catch diaries at lower levels. According to Russian and Norwegian law, it is illegal to transfer fish at sea to third party transport vessels. Such transport is thus per definition illegal. Some Russian flagged reefer vessels also escape Coastguard inspection, and several transshipments between fishing vessels and Russian flagged reefers are also happening unregistered. A brief list of well-known reefers taking regular part in this trade is s annexed to this paper. It is unacceptable that EU member states, dedicated to eliminating IUU fishing through international agreements, do nothing to stop these vessels from landing illegal fish in their ports.

¹³ See recent report <http://www.greenpeace.org/international/press/releases/murky-waters>

¹⁴ Norwegian status reports about Russian cod catches and deliveries 2002-2004:
www.fiskeridir.no/fiskeridir/ressursforvaltning/rapporter/russisk_fangst_av_torsk_omlating_paa_havet

3. Destructive, unfair and irresponsible – the EU's plan of inaction

There is an urgent need for EU Member States to take action. Because the Russian fishery business is infected with mafia, not all reports coming in from foreign harbors are subtracted from the legal quotas. The fact is that the Member States of the European Union are not dealing effectively with the issue of illegal fishing and that at EU level the European Commission seems reluctant to take action against Member States that fail to comply with EU law. Frequently it seems, vessels are landing illegal fish in EU ports, and are provided shelter and allowed to refuel and restock in EU harbors. Illegal fish is brought to markets without prior notification of other states involved in the fishery and relevant regulatory bodies. Sanctions against vessel owners and operators engaged in IUU fishing are often too weak to be a deterrent against illegal fishing. Moreover, vessel owners should be required to use digital, real-time catch diaries, which cannot be manipulated. There are insufficient systems to ensure that all EU port states treat illegal fishing-vessels equally, and no system of a central monitoring, control and compliance authority.

While Norway, not an EU Member State, does not allow vessels with a record of illegal fishing or illegal transfer of fish to use Norwegian ports for offloading and does not provide services, a number of EU Member States continue to tolerate these vessels in their ports. The Netherlands and Germany, for instance, tolerate IUU vessels, while at the same time sending a copy of the landing notes together with information on how much fish was landed where and when to Norway and Russia. They also provide data on the quota against which the landed fish was recorded. Other EU Member States, such as the UK, Denmark, Spain and Portugal, on the other hand, refuse even this level of cooperation with Norway, thus ignoring agreements on combating illegal fishing under the 2001 FAO Plan of Action.

Where rules do exist, such as in the case of vessels formally confirmed as having engaged in IUU fishing and black-listed for this offence, these need to be implemented and adequately enforced by all national governments. In the case that Member States of the EU do not implement existing rules appropriately, the European Commission has the responsibility to enforce them.

Greenpeace calls on EU Member States and Norway to act by:

- Ensuring that fishing in the Barents Sea is managed sustainably as regards the impact of fishing on the ecosystem and fish stocks.
- Honoring their commitments under the FAO plan of action to combat IUU fishing
- Developing onboard electronic recording and joint centralized registered systems to ensure that cod is landed in ports authorized by the Member States of the EU or Norway, and that this catch is translated into an immediate deduction of the legal quota of the fishing vessel concerned. Such a system would reinforce existing port control measures.
- By ensuring appropriate enforcement action including measures against those companies involved in the trade of illegal fish, and increased investigation efforts and resources to combat this sort of fish crime.
- Establish a central monitoring, control and compliance authority and use of vessel monitoring system for all vessels active in the Barents or high seas, as well as improved and direct cooperation with the relevant Russian authorities, not the mafia.
- Outlawing all transshipment at sea until an internationally agreed upon set of transfer areas for the transfer of legally caught cod from trawlers to freezer ships is demarcated, allowing effective monitoring and control by the coastguard.
- Ban all unloading of Barents Cod from black-listed or convenience-flagged transport vessels in EU harbors

4. The lack of proper European cooperation to combat illegal cod landings

According to sources available to Greenpeace, **Dutch** and **German** harbors provide reasonably good information about landings of cod to both Russian and Norwegian authorities. Both countries have signed political declarations of cooperation with Norway on illegal fishing. However, both countries appear to allow third party flagged reefers to unload Russian cod in their harbors, even without special inspection treatments. It is unclear if this is due to a lack of will on their part to inspect such vessels, or confusing jurisdictional issues. Testimonies from a Russian escapee to Germany this fall opened the issue politically and increased cooperation significantly, said a source. Dutch harbors Eemshaven (close to Groningen) and Velsen (close to Amsterdam) are among the most important and frequently used landing ports for illegal cod. Also Bremerhaven is used. As long as Russia does not take account of notifications sent from the harbors, even harbor reports do not solve the problem.

UK and **Danish** ports say they report landings to Russia, but they refuse to copy this information to Norwegian authorities, even on direct request. Both countries have signed political declarations of cooperation with Norway on illegal fishing. Reason is given to be that they cannot legally disclose such information about Russian fish landings to a third party like Norway. However, it is clear that Norway is the only one to try to follow up on the Russian quotas. There is also a lack of clarity as to which routines these ports have for report and/or control. UK officials and police did initiate an investigation into the landing of cod by the Cambodian reefer *Langust* when Norwegian police traveled over this summer with evidence and supported the UK control. The proceedings of the investigation after this is not known to Norway, and *Langust* has continued to deliver cod in Europe. The most recent landing record by *Langust* held by the Norwegian authorities was 500 tons cod offloaded in Eemshaven late 2005, including cod taken by the trawler *Elektron* that has over-fished its quota several times every year. Grimsby (close to Manchester) seems to be the no 1 UK harbor for illegal cod landings, at least by transport reefers. Skagen, Esbjerg and Hirtshals seem to be important harbors in Denmark.

Spanish and **Portuguese** authorities show no cooperation with Norwegian authorities, and have even refused to respond to invitations for cooperation on a political level. Another source said those involved in the fish business know these countries are the places to get rid of *any* illegal catch. The Portuguese port of Aveiro (near Porto) and Spanish port, Vigo (on Portuguese border) are used quite often for the delivery of Barents cod. Aveiro is the home-port of the Togo-flagged bottom trawler *Kerguelen*, which Greenpeace documented fishing illegally in the Barents in September 2005 and is blacklisted even by the EU.

Quite some of this cod is also landed in **Lithuania** (Klaipėda), **Poland** (Swinoujscie) and **Morocco** (Agadir), which also are harbors with poor feedback systems. Convenience flagged reefers never land Russian cod in Norway. Any transfer of fish to carriers under flags of convenience is banned by Russian law. A significant volume of around 70.000 tons of Russian cod is landed in Norway by trawlers or carrier ships annually. The level of control in Norway and Iceland is far better than in other European states.

Annex 1: Illegal, suspicious and blacklisted vessels:

Frequent convenience-flagged **illegal transport reefers** operating in Barents:

Langust (Cambodia)
Ice Bay (Cambodia)
Sindbad (Georgia) (former Griol, Belize)
Tiflis (Georgia)
Avior (Georgia)
Rustavi (Georgia)
Regor (Georgia)
Telavi (Georgia)
Sevsk (Belize?)
Briz, Georgia
Turicia (Panama)
Sunny Lina (Belize)
Sunny Jane (Belize)
Ice Queen (Belize)
Karat Reefer (Belize)
Adam (St. Vincent)

Particularly suspicious Russian-flagged transport reefers. The scale of illegalities varies across the members of this list:

Baskunchakisky (UBAZ): Involved in unreported transshipment

Chernoyarskiy (UBMU): Involved in unreported transshipment

Inna Gussenikova (UFTD) (now Telavi): Involved in unreported transshipment

Jupiter: Very restrictive with information and involved in unreported transshipment

Kildin: Goes around NEZ and REZ and offloads normally in Spain/Portugal

Mangazeya (UAUY): Involved in unreported transshipment

Metelitsa: Involved in unreported transshipment.

Petrosavodsk: Often avoiding Coastguard inspection and seems to be hired to transship cod from trawlers in Barents to deliver in EU. Involved in unreported transshipment.

Pjotr Gusenkov (UCEFC): Involved in unreported transshipment

Plutonas: Goes around NEZ and REZ and escaped Norwegian Coastguard Dec 20.2005 before offloading in Grimsby. Involved in unreported transshipment

Svir: Involved in unreported transshipment.

Tanais (UAUY): Involved in unreported transshipment

Umbrina: Involved in unreported transshipment. Often avoiding inspection.

Verkhovina: Involved in unreported transshipment.

Some Russian trawlers involved in cod over-fishing and illegal transfer at sea:

This is a minimum-list, partly based on a variety of sources, thus incomplete and indicative only, however 73 entries out of some 190 Russian trawlers is much. The scale of illegalities varies across the members of this list:

ALEKSEY AFANASYEV M-0387 UCIY
AMETIST M-0124 UBIU
ANDREY PASHKOV M-0600 UCUP
ALTSIONA UARL
ATIK M-0247 UFTY
BIRSK M-0313 UARN
BIZON UCCE
DIANA M-0128 UCHJ
DIMAS M-0281 UBPS
ELEKTRON M-0133 UCQV
ERIDAN M-0283 UDLC (IMO 8606939)
GALATIS M-0120 UENY
GARUSH KONSTANTINO UCBG
GREMYACHINSK M-0303 UAND
GRIGORIY ARLASHKIN M-0131 UBJI
GULDRANGUR UEOL
IZMAYLOVO UAMW
KAPITAN GORBATSJOV
KAPITAN ROGOZIN UAZN
KAPITAN SHAYTANOV UFYN
KATHRINE M-0125 UBCZ
KEPROMAR UASV
KHAROVSK/PONNOY (IMO 7630165)
KOSINO M-0154 UCRT
KOYDA M-0311 UARG
KOZLOVO M-0317 UART
KRASNOKAMENSK M-0097 UDUU
KVIRILA
LUDA UBMH
LUYBLINO
MAKSHEVO UAMV
MEDVEZHNEGORCK M-0294 UAWP

MICHURINSK M-0314 UARK, (IMO 8721612)
MIIDURAND M-0177 UEYR
MIRNY M-0167 UCSD
MOUNT KENT M-0211 UIEU
MOZDOK M-0099 UCTC
MURMANSK M-0115 UAUW
NES UADS
NIKOLSKIY UIVO
NIZHNEAGARSK (IMO 7630309)
OBDORSK M-0069 UIAA
OBSHA M-0282 UCZI
OBVA M-0075 UHLK
OKHTA S-0244 UGOW
OKSINO UHUK
OLENTY UGVU
OLUSTVERE UHFE
OR UGVZ
ORGEEV M-0071 UERI
OSTROV ANZER M-0333 UAYU
OSVEYSKOYE M-0050 UDXD
PERSEY
PESHA M-0121 UAZM
PINRO 1 UAJY
PINRO 2 UASC
POMORYE M-0383 UHYX
RYBAK KAREL /II UHNO
ROS (IMO 7833236)
SANTA M-0385 UBIJ (IMO 8721791)
SEVERNAYA ZVEAZDA UICK
SINYAVINO
SOYANA M-0323 UARQ
STAKFELL UCCG
TERIBERKA M-0137 UAZQ
TILIGUL M-0306 UARO (IMO 7831135)
TOBAGO M-0394 UIOU
USMA M-0127 UBDD
VYSOTA M-0119 UEOA
VLADIMIR ZAGOSKIN
YAROSLAVETS M-0192 UCSJ
ZHEMCHUZHINA M-0123 UBGZ

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¹⁵ Various sources; Norwegian Fisheries Directorate, Newspaper Fiskaren 20.01. and 15.3.2006, NRK Brennpunkt, TV4 Kalla Fakta, other communication. The complete list of trawlers that have fished over quota that is held by the Fisheries Directorate is not yet published. See the minimum list over 41 Russian trawlers that have been documented involved in illegal transshipment at http://fiskeridirektoratet.no/fiskeridir/ressursforvaltning/illegal_transshipment (9.2.2006)

Sources and more information for further reading:

Norwegian Documentary NRK Brennpunkt 21.09.2004 documented how Russian trawlers in connection with Norwegian and European investors systematically over-fish their quotas by exporting fish directly to EU harbors:

www.nrk.no/programmer/tv/brennpunkt/4100216.html

The Norwegian discard commission:

http://odin.dep.no/fkd/norsk/dok/andre_dok/rapporter/008041-220010/dok-bn.html

The FAO publication SOFIA assess the state of global fisheries:

www.fao.org/newsroom/en/news/2005/100095/

FAO special IUU section

www.fao.org/newsroom/en/focus/2004/47127/index.html

FAO special meeting IUU 2004:

www.fao.org/newsroom/en/news/2004/47649/

FAO International Plan of Action on IUU (IPOA) contains overview over situation as well as proposed control measures:

www.fao.org/documents/show_cdr.asp?url_file=/DOCREP/003/y1224e/y1224e00.HTM

EU action-plan for the eradication of illegal, unreported and unregulated fishing:

http://europa.eu.int/comm/fisheries/doc_et_publ/factsheets/legal_texts/docscm/en/com_02_180_en.pdf

The newspaper Fiskaren: www.fiskaren.no / www.intrafish.com

Norwegian documentary Brennpunkt 24.01.2006:

<http://www.nrk.no/programmer/tv/brennpunkt/5424477.html>

Swedish documentary Kalla Fakta 18.01.2006 and 25.01.2006:

<http://www.tv4.se/nyheter/kallafakta/438576.html>

41 Russian trawlers that have been documented involved in illegal transshipment at

http://fiskeridirektoratet.no/fiskeridir/ressursforvaltning/illegal_transshipment

EU Traceability Directive EC 178/2002:

http://europa.eu.int/comm/food/food/foodlaw/traceability/index_en.htm

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