

Revise the FAO Ecolabelling Guidelines to meet the needs of small-scale fisheries

Briefing note: COFI Fish Trade Meeting

8-12 September 2025, virtual

Background – ecolabelling as a barrier to market access for small-scale fisheries

The majority of the world's fisheries are small-scale, and they represent 90% of capture fisheries employment ([FAO, 2015](#), p.ix). The FAO Committee on Fisheries (COFI) Sub-Committee on Fish Trade, has recognised the importance of these small-scale fisheries (SSF) in global seafood supply chains, both within primary and secondary sectors ([FAO, 2022](#)). However, it is also well recognised that SSF face numerous barriers in obtaining access to markets.

Ecolabelling schemes represent one such barrier, despite the positive environmental intentions underlying these schemes. In many instances, ecolabelling has become a prerequisite for market access ([Pita and Ford, 2023](#), p.10). However, these certification schemes are widely inaccessible to SSF: large upfront costs associated with fisheries assessments, requirements for strong data management infrastructure, and the fulfillment of detailed environmental and traceability standards limit the inclusion of many SSF ([ibid.](#); [Tenório Gouveia de Melo et al., 2024](#); [Højrup and Hegland, 2021](#)).

A global standard for ecolabelling – the FAO Ecolabelling Guidelines

Ecolabelling initiatives began in the 1970s and 1980s, first put in place by governments but increasingly now operated by non-governmental organisations ([Simi, 2009](#)). Building from the trade-related provisions in the FAO's 1995 [Code of Conduct for Responsible Fisheries](#), in 2005, the FAO's COFI adopted [Guidelines for the ecolabelling of fish and fishery products from marine capture fisheries](#) (Ecolabelling Guidelines), which were then revised in 2009.

Setting out key principles, the Guidelines state that ecolabelling schemes should “provide the opportunity to enter international markets” ([para. 2.6](#)) and posit that “standards should not distort global markets and should not create unnecessary obstacles to international trade” ([para. 41](#)). However, in setting out minimum substantive criteria for assessing whether an ecolabel should be awarded to a fishery, these guidelines make only limited reference to SSF.

In relation to small-scale fisheries, the Guidelines only note that “special consideration” needs to be given “with respect to the availability of data and with respect to the fact that management systems can differ substantially for different types and scales of fisheries” ([para. 29](#)). There is no further detail included on how this special consideration should operate. Beyond this there is only a note that a “variety of management measures commonly used in small scale or low value fisheries” can nonetheless “achieve quite adequate levels of protection for stocks in the face of uncertainty about the state of the resource” ([para. 32](#)). Given that 90% of capture fisheries employment occurs at the small-scale level, it is particularly concerning that the international minimum standard does not differentiate between small and large-scale operations, being implicitly designed for the certification of industrial fisheries.

Today the Ecolabelling Guidelines inform the [Global Seafood Sustainability Initiative](#), a public-private partnership with the FAO which created a tool to assess seafood certification schemes against the Ecolabelling Guidelines (for marine or inland capture fisheries as well as for aquaculture) and FAO Code of Conduct for Responsible Fisheries. Certification schemes which successfully complete the GSSI Benchmark Process are publicly announced as ‘GSSI recognised’. This demonstrates the extent to which the FAO Guidelines set the basis for development and recognition of ecolabelling schemes.

Evidently, various forces shape access to markets. Seafood markets involve a complex system of actors and institutions: from producers, processors, exporters, importers, suppliers, retailers, and consumers. These actors and their activities are shaped by national government regulations, as well as by market forces, increasingly accompanied by a host of non-governmental bodies enabling voluntary sustainability standards. However, it is critical to recognise that national regulation and market practices are broadly shaped by high-level policy produced by international institutions, such as the FAO Ecolabelling Guidelines.

The developing international policy landscape

Since 2009 (when the Ecolabelling Guidelines were last revised), major global developments have redefined global concepts of sustainability and highlighted the important role and specific requirements of SSF. These include the creation in 2015 of the [Sustainable Development Goals](#) (SDGs), notably [SDG14b](#) which set the target that small-scale fishers have access to both resources and markets ([UN General Assembly, 2015](#)).

Equally, the 2014 [Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication](#) (SSF Guidelines) called for States to “facilitate access to local, national, regional and international markets and promote equitable and non-discriminatory trade” and to further support regional trade in small-scale fishery products ([para 7.6](#)) The adoption of the SSF Guidelines placed SSF more firmly on the international policy agenda. This has been complemented by the declaration of 2022 as the [International Year of Artisanal Fisheries and Aquaculture](#), and the holding of a [second Small-Scale Fisheries Summit](#) in 2024. It is crucial to now ensure synergy between the Ecolabelling and SSF Guidelines.

Another key development is the increased concern over fisheries subsidies. Schuhbauer et al found in 2020 that of the reported global fisheries subsidies provided in 2018 (USD 35.4 billion), only 19% went to SSF ([Schuhbauer et al, 2020](#)). The problems associated with fisheries subsidies finally became subject to a specific international legal framework with the adoption in 2022 of the [WTO Agreement on Harmful Fisheries Subsidies](#), which requires just a few more WTO members to deposit [instruments of acceptance](#) for it to enter into force. Negotiations to set rules specifically preventing subsidies which engender overcapacity and overfishing are still ongoing ([Irschlinger, 2024](#)). While not yet settled, these advances in the international norms on fisheries subsidies should also be reflected in standards for ecolabelling, as ecolabelling should contribute to enhancing subsidies transparency.

It is increasingly evident that the current framework of the Ecolabelling Guidelines does not adequately consider the challenges faced by SSF in securing ecolabel certification. Defining the parameters of what constitutes sustainable fisheries cannot be done without taking into consideration these more recent developments focused on addressing the systems that foster inequality by fueling unfair competition between large fleets and artisanal fishers and fish workers.

Calls for revision of the FAO Ecolabelling Guidelines

In this context, work to recognise ecolabelling as a potential market access barrier for SSF began to be carried out by the FAO’s COFI and its sub-committees. In 2022, the 18th meeting of the COFI Sub-committee on Fish Trade (COFI:FT) recognised that ecolabelling schemes “tend to marginalise” SSF operators, which “do not have the requisite financial, technological or human resources to meet such requirements” ([COFI:FT, 2022](#), para. 8). The report of this meeting called for “multistakeholder collaboration to improve market access for SSF” and “suggested that FAO conduct an analysis of traceability and certification schemes for SSF and provide related guidance and technical support to Members” ([COFI:FT, 2022](#), para. 30).

The next year in September 2023, the Sub-committee took a step further and reported that “sustainability certification standards for fisheries are not always well tailored to SSF and could act as non-tariff trade barriers” (COFI:FT, 2023, para. 37). The Sub-Committee therefore expressed support for “analysis of certification schemes for SSF and called for a judicious review of the FAO Ecolabelling Guidelines” (ibid. para. 38).

Taking into consideration the Sub-committee’s report, in July 2024 the full Committee on Fisheries then “requested FAO’s assistance to address challenges in market access, fisheries statistics and cross-border trade, especially for SSF in the context of fish trade, including by updating the FAO ecolabeling guidelines to align with global instruments such as the [SSF Guidelines]” (COFI, 2024, para. 12(j)). However, recognition of this call to update the Ecolabelling Guidelines remains only a first step in the process of actually integrating the requirements of SSF into the Guidelines.

Renewed engagement at the UN Ocean Conference Side Event ‘Addressing Market Access Challenges faced by Small-Scale Fisheries’

To continue to highlight the challenges faced by SSF in accessing markets, IPNLF and co-sponsors the governments of Indonesia and Somalia, the Sustainable Fisheries and Communities Trust, Fauna and Flora International, and the Too Big to Ignore (TBTI) Global Network organised a side event during the Third UN Ocean Conference in June 2025 (UNOC3).

Introductory speeches from Lotharia Latif, Director General of Capture Fisheries, Ministry of Marine Affairs and Fisheries of the Republic of Indonesia, and The Honourable Aminath Hussain Shareef, Minister of State for Fisheries and Ocean Resources of the Republic of Maldives, were followed by a panel moderated by Dr Maia Perraudeau, IPNLF’s International Law and Policy Advisor, and composed of experts from national governments, the FAO, small-scale fishery producer associations, academia, and retail.

Panellists discussed the extent to which ecolabelling has become a precondition of access to high-value markets and agreed with the call to review of the FAO Ecolabelling Guidelines. Several panellists explained different ways the current paradigm of ecolabelling schemes favours large-scale industrial fisheries, entrenching market access barriers to small-scale fisheries. Participants also shared detailed approaches for ensuring equity between small- and large-scale fisheries in certification schemes. Linda Wood, CEO of Community Catch, shared insights into launching a certification standard designed to meet the needs and capabilities of small-scale fisheries.

The panel also discussed the role that market actors could play to ensure market access for small-scale fisheries. Panellist Dr Cristina Pita of the Institute of Marine Research in Vigo and the Centre for Environmental and Marine Studies at the University of Aveiro emphasised that retailers should not rely exclusively on ecolabels in their sourcing strategies. “Retailers need to explicitly recognise the value of small-scale fisheries in their seafood procurement policies,” she said.

The session also underscored the need to end harmful subsidies that disadvantage small-scale fisheries—both in international trade and in certification schemes. The vast majority of fishery subsidies go to industrial-scale operations, contributing to overfishing while further marginalising small-scale fisheries. In contrast, speakers highlighted capacity-strengthening schemes for small-scale fisheries that can incentivise sustainable fishing, improve safety at sea, and promote effective monitoring and enforcement. In view of this there was a growing consensus of the need to redirect funds away from harmful subsidies for large-scale industrial fisheries and towards low-impact small-scale operations.

Overall, the discussions resulted in three key recommendations:

1. **At market level:** explicitly recognise the importance of small-scale fisheries in seafood procurement policies
2. **At national level:** redirect harmful fisheries subsidies to benefit low impact small-scale fisheries
3. **At international level:** update the FAO Ecolabelling Guidelines to ensure ocean equity

Next steps – forging momentum for international policy change

Ultimately, the Ecolabelling Guidelines should be updated to reflect the expansion of the international framework on sustainable fishing and integrate the needs of SSF to ensure that ecolabelling schemes do not result in marginalisation of SSF. However, doing so requires building a strong coalition of interested actors to push for this outcome and provide input on how to achieve this goal.

The next step in this regard is the upcoming meeting of the COFI Sub-committee on Fish Trade, from 8-12 September 2025, happening [online](#). IPNLF encourages interested FAO Member States and observer organisations to join the meeting and raise their views. Moreover, given that the status quo disadvantages small-scale producers, it is critical to ensure maximum engagement with this topic so that the Ecolabelling Guidelines are updated in a timely manner.

References

- Autzen, M.H. and Hegland, T.J., 2021.** When 'sustainability' becomes the norm: Power dynamics in the making of a new eco-label for low-environmental-impact, small-scale fisheries. *Marine Policy*, 133, 104735.
- FAO, 2009.** FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries Revision 1. Rome: FAO.
- FAO, 2015.** Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication. Rome: FAO.
- FAO, 2022.** Committee on Fisheries: Report of the Eighteenth Session of the Sub-Committee on Fish Trade Committee on Fisheries – Virtual meeting, 8 April to 8 May 2022, and 7, 8, 9 and 20 June 2022, No. 1384. Rome: FAO.
- FAO, 2022.** Small-scale fisheries and international trade, COFI/FT/XVIII/2022/5. Rome: FAO.
- FAO, 2022.** Supporting Small-scale and Artisanal Fisheries, COFI/2022/INF/9. Rome: FAO.
- FAO, 2024.** Committee on Fisheries: Report of the 19th Session of the Sub-Committee on Fish Trade, Bergen, Norway, 11–15 September 2023, FAO Fisheries and Aquaculture Report, No. 1429. Rome: FAO.
- FAO, 2024.** Report of the Thirty-sixth Session of the Committee on Fisheries, Rome, 8–12 July 2024. FAO Fisheries and Aquaculture Report, No. 1459. Rome: FAO.
- Irschlinger, T., 2024.** World Trade Organization Talks on Subsidies that Contribute to Overcapacity and Overfishing: What's on the table? Winnipeg: International Institute for Sustainable Development.
- Pita, C. and Ford, A., 2023.** Sustainable seafood and small-scale fisheries: improving retail procurement. London: IIED.
- Schuhbauer, A., Skerritt, D.J., Ebrahim, N., Le Manach, F. and Sumaila, U.R., 2020.** The global fisheries subsidies divide between small- and large-scale fisheries. *Frontiers in Marine Science*, 7, 539214.
- Simi, T.B., 2009.** Discussion Paper Eco-labels: Trade Barriers or Trade Facilitators? Jaipur: CUTS Centre for International Trade, Economics & Environment.
- Tenório Gouveia de Melo, M., et al., 2024.** The role of certifications and eco-labels in fisheries: a systematic literature review of their benefits and challenges. *Environmental Sciences Europe*, 36(200).