

# UNIVERSAL CAVIAR LABELLING REQUIREMENTS

All sturgeon caviar containers in domestic and international trade have to bear a non-reusable label containing details about the source and the country of origin of the caviar. Governments around the world have agreed to a universal caviar labelling system with the aim of ensuring that all caviar entering the market is from legal sources. The caviar labelling system helps governments, traders and consumers in distinguishing legal caviar in trade from illegal caviar. This leaflet highlights requirements that governments and the caviar industry need to implement under the universal caviar labelling system.

## BACKGROUND

All species of sturgeon and paddlefish have been listed in the Appendices of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) since 1998. Two species—the Common or Baltic Sturgeon *Acipenser sturio* and the Shortnose Sturgeon *Acipenser brevirostrum*—are listed in Appendix I of the Convention, which prohibits any international commercial trade. All other species are listed in Appendix II, whereby international trade is regulated by governments through a system of permits.

With the aim of facilitating the legal caviar trade around the world and allowing the easy identification of the source and origin of caviar, governments agreed at a CITES meeting in 2000 to introduce a standardized labelling system for all caviar exports. Two years later, they extended the labelling requirements and agreed that all caviar containers in trade, whether imported, exported, re-exported or in domestic markets, should bear a label that would contain a specific set of information, including the country of origin and the year of harvest, to allow identification of the source of the caviar. Governments agreed that, as of January 2004, they would only accept imported caviar shipments marked according to the labelling guidelines. In addition to this they agreed that all caviar sold on domestic markets would also require labels, including caviar that is re-packaged. A detailed description of information that needs to be included on the labels can be found in *CITES Resolution Conf. 12.7 (Rev. CoP14)*.

As a result of these developments, governments around the world have started to enact and implement legal and administrative measures at the national level to meet the CITES provisions on caviar labelling. In May 2006, the European Union (EU) adopted *Commission Regulation (EC) No. 865/2006*, later amended by *Regulation (EC) No. 100/2008*, which has made the labelling of all caviar containers obligatory in all EU Member States. As a result, all caviar containers in the EU market, regardless of their size, are required to bear a CITES label.

It is therefore essential that everyone involved in the trade and marketing of caviar (including importers, exporters, wholesalers, retailers, restaurants and travel businesses, such as cruise ship operators, airlines and luxury hotels) are aware of the labelling requirements so that all can adequately implement and comply with the new



Beluga caviar can fetch retail prices of up to EUR 600 per 100 g.

Credit: Sergey Kuznetsov



rules. Consumers will also benefit from these new labelling requirements as they will allow them to verify the legality of caviar when making their purchasing choices.

## STURGEON PRODUCTS AFFECTED

All caviar from all species of sturgeon and paddlefish are covered by CITES. Common names and grades of caviar include: Beluga, asetra, osetra, sevruga, kaluga, hackleback, paddlefish, shovel-nosed sturgeon, American sturgeon, American black and sterlet. CITES covers trade in all specimens, parts and products (derivatives) of sturgeons and paddlefish, including caviar, meat, leather, live fish, fertilized eggs, cartilage and fish glue. Pressed caviar, pasteurized caviar and the most commonly exported caviar, lightly salted "malossol", are also covered by CITES. Any international shipments of these products must therefore always be accompanied by the relevant CITES permits. For further information on CITES permits, contact the CITES Management Authority in your country or visit the CITES Secretariat website (at [www.cites.org](http://www.cites.org)).

The CITES labelling requirements currently apply only to caviar. Roe from non-CITES-listed fish, including products often referred to as "caviar substitutes", are not regulated by CITES. In several countries (and in the EU), the use of the word "caviar" is restricted, by law, to roe of sturgeon and paddlefish.

## LABELLING REQUIREMENTS

Under the CITES requirements for caviar labelling, all primary containers of caviar must have a non-reusable label, which means that the label cannot be removed without being damaged. This includes tins, boxes, jars or any other container into which caviar is directly packed, regardless of their size or whether their shipping destination is domestic or international. The labelling requirements apply to all caviar whether it is produced for commercial or non-commercial purposes and sold internationally or on the domestic market. The non-reusable label is to be affixed by a processing or re-packaging plant. The label must either seal the container or the caviar must be packaged in such a manner as to permit visual evidence of any opening of the container. The information that appears on the label must be included in or attached to the CITES export permit. There are two types of labels—the type used depends on whether the caviar is packed by a processing plant in the country of origin or re-packaged in another country.



Photos above:

Caviar seized in Germany in March 2005.

Credit: Customs Investigation Office Essen, Germany

## LABEL: COUNTRY OF ORIGIN

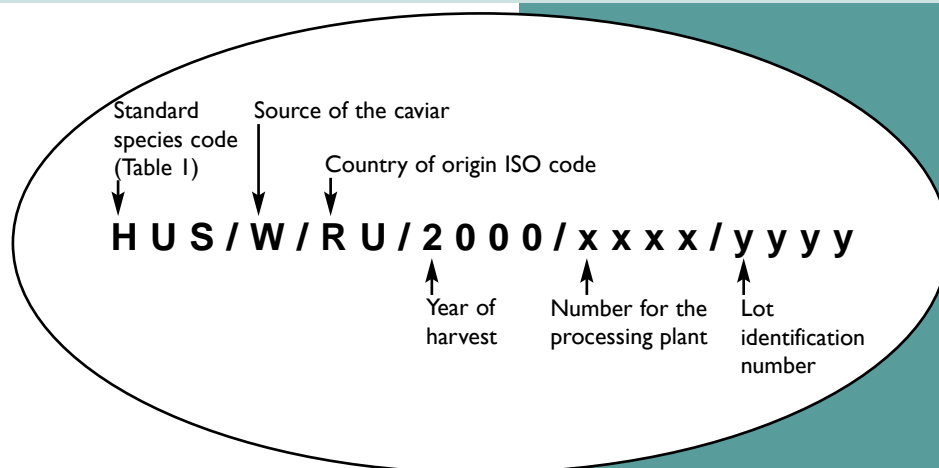
The label for caviar containers packed by processing plants in the country of origin should include the following information, in the order described:

**1. Standard species code:** CITES has determined three-letter codes for the identification of sturgeon and paddlefish species, hybrids and mixed species. 'HUS', for example, is the standard species code for Beluga *Huso huso*. These codes are provided in Table I.

**2. Source code:** A letter used on CITES documents to indicate the source of the caviar, either 'W' for sturgeon harvested from the wild or 'C' for captive-bred sturgeon.

**3. Country of origin code:** This is the International Organization for Standardization (ISO) two-letter code for the country of origin, e.g. RU for the Russian Federation. A list of ISO country codes can be found at <http://www.cites.org/eng/disc/parties/alphabet.shtml>

**4. Year of harvest**



**5. Official registration code of the processing plant:** Each exporting country should establish a national registration system for processing plants, with official registration codes assigned to each. This number corresponds to that code.

**6. Lot identification number:** This is a number that corresponds to information related to the caviar tracking system used by the processing or re-packaging plant.

## LABEL: COUNTRY OF RE-PACKAGING

If an importer or trader repackages the caviar in their own tins, jars, boxes or any type of new container, they must affix a new label on every new caviar container, regardless of the size of the container or whether the shipping destination is domestic or international. It must include the following information, in the order described:

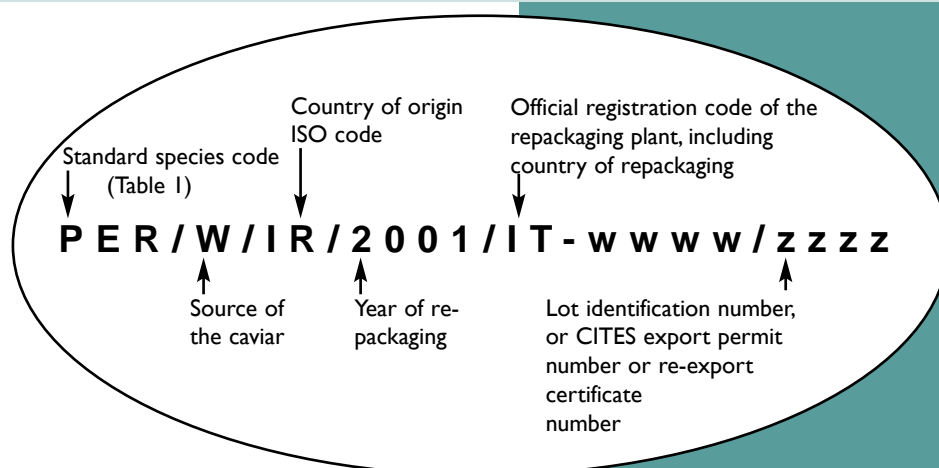
**1. Standard species code** (as described above)

**2. Source code** (as described above)

**3. Country of origin code** (as described above)

**4. Year of re-packaging**

**5. Official registration code of repackaging plant:** Each importing and re-exporting country should establish a national registration system for re-packaging plants, with official registration codes assigned to each. This number corresponds to that code (as described above). The code should incorporate the ISO two letter code of the country of



repackaging if different from the country of origin. A list of ISO country codes can be found at <http://www.cites.org/eng/disc/parties/alphabet.shtml>

**6. Lot identification number OR CITES export permit number OR CITES re-export certificate number.**



**TABLE 1:**  
STANDARD SPECIES CODES FOR STURGEON AND PADDLEFISH

Scientific Name	Standard Species Code
<i>Acipenser baerii</i> : Siberian Sturgeon	BAE
<i>Acipenser baerii baicalensis</i> : Baikal Sturgeon	BAI
<i>Acipenser brevirostrum</i> : Shortnosed Sturgeon	BVI
<i>Acipenser dabryanus</i> : Yangtze Sturgeon (Dabry's sturgeon, Changjiang Sturgeon, River Sturgeon)	DAB
<i>Acipenser fulvescens</i> : Lake Sturgeon (Freshwater Sturgeon, Great Lakes Sturgeon, Red Sturgeon, Rock Sturgeon, Ruddy Sturgeon, Shell-back Sturgeon, Smoothback, Stone Sturgeon, Bony Sturgeon)	FUL
<i>Acipenser gueldenstaedtii</i> : Russian Sturgeon	GUE
<i>Acipenser medirostris</i> : Green Sturgeon	MED
<i>Acipenser mikadoi</i> : Sakhalin Sturgeon	MIK
<i>Acipenser naccarii</i> : Adriatic Sturgeon (Italian Sturgeon)	NAC
<i>Acipenser nudiventris</i> : Ship Sturgeon	NUD
<i>Acipenser oxyrhynchus</i> : Atlantic Sturgeon	OXY
<i>Acipenser oxyrhynchus desotoi</i> : Gulf Sturgeon	DES
<i>Acipenser persicus</i> : Persian Sturgeon (Fringebarbel Sturgeon, Thorn Sturgeon, Spiny Sturgeon)	PER
<i>Acipenser ruthenus</i> : Sterlet	RUT
<i>Acipenser schrencki</i> : Amur Sturgeon	SCH
<i>Acipenser sinensis</i> : Chinese Sturgeon	SIN
<i>Acipenser stellatus</i> : Stellate Sturgeon (Sevruga, Star Sturgeon, Starry Sturgeon)	STE
<i>Acipenser sturio</i> : Common Sturgeon (Baltic Sturgeon)	STU
<i>Acipenser transmontanus</i> : White Sturgeon	TRA
<i>Huso dauricus</i> : Kaluga Sturgeon	DAU
<i>Huso huso</i> : Giant sturgeon (Beluga, Great Sturgeon)	HUS
<i>Polyodon spathula</i> : American Paddlefish	SPA
<i>Psephurus gladius</i> : Chinese paddlefish (Chinese Swordfish)	GLA
<i>Pseudoscaphirhynchus fedtschenkoi</i> : Syr-Dar Shovelnose	FED
<i>Pseudoscaphirhynchus hermanni</i> : Small Amu-Dar Shovelnose	HER
<i>Pseudoscaphirhynchus kaufmanni</i> : Large Amu-Dar Shovelnose (False Shovelnose Sturgeon, Shovelfish)	KAU
<i>Scaphirhynchus albus</i> : Pallid Sturgeon (White Hackleback, White Shovelnose)	ALB
<i>Scaphirhynchus platyrhynchus</i> : Shovelnose Sturgeon (Switchtail, Sand Sturgeon, Oregon Sturgeon, Sacramento Sturgeon)	PLA
<i>Scaphirhynchus suttkusi</i> : Alabama Sturgeon	SUS
Mixed species (for "pressed" caviar exclusively)	MIX
Hybrid specimens: code for the species of the male YYY	YYYxXXX
code for the species of the female XXX	YYYxXXX

Source: Annex 2 of CITES Resolution Conf. 12.7 (Rev. CoP14)

To obtain CITES Resolution Conf. 12.7 (Rev. CoP14) on Caviar Labelling, for further information about CITES, and to find the contact details of the relevant authorities in your country, visit [www.cites.org](http://www.cites.org).

For information on the regulations relating to trade and labelling of caviar in the European Union, visit the CITES website of the European Commission at [http://europa.eu.int/comm/environment/cites/home\\_en.htm](http://europa.eu.int/comm/environment/cites/home_en.htm) or the EU Wildlife Trade Information pages under [www.eu-wildlifetrade.org](http://www.eu-wildlifetrade.org)

TRAFFIC, the wildlife trade monitoring network, works to ensure that trade in wild plants and animals is not a threat to the conservation of nature. For further information about TRAFFIC visit [www.traffic.org](http://www.traffic.org).

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Credit: Emma Duncan /WWF-Canon



Credit: Vitally Loyalnich

