

Discussion Paper

A precursory draft on **NATIONAL GUIDELINES FOR MARINE ECOLABELLING IN INDIA**



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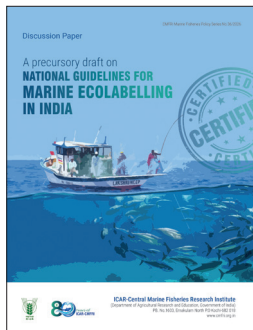


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Foreword

This precursory draft on National Guidelines for Marine Ecolabelling is being proposed as a clear and balanced framework to enable responsible fisheries ecolabeling in India. As the global demand for sustainable and traceable marine products grows, it is important that Indian fishers, processors and coastal communities can participate confidently and equitably in ecolabelling initiatives.

With the anticipated entry and expansion of major international ecolabelling programmes into the Indian seafood sector, a national framework is essential to maintain clarity and fairness. These Guidelines aim to support that transition by helping to create a level playing field for domestic initiatives, small-scale fishers and global certifiers alike, while safeguarding national interests and coastal livelihoods.

For fishing communities, the Guidelines help ensure fair access to certification systems and promote long-term resource security. For supply-chain actors, they establish consistent expectations on responsible sourcing and traceability. For consumers, they reinforce trust that labelled seafood is produced in an ethical and environmentally sound manner.

The Guidelines do not prescribe how ecolabelling schemes should assess fishery health or sustainability. Certification bodies remain free to apply their own scientific standards and protocols. The Guidelines instead set out basic operational expectations—such as fairness, equity of access, non-exclusion and non-discrimination, scientific robustness, legal conformity and responsible data-sharing—to ensure that certification activities are conducted transparently and in harmony with India's fisheries governance.

By aligning sustainability with socio-economic well-being, the Guidelines aim to strengthen India's seafood sector and ensure that the benefits of responsible fishing reach all those who depend on marine resources—from coastal communities to consumers.

Dr. Grinson George
Director

A Precursory Draft on National Guidelines for Marine Ecolabelling in India

1. Preamble

India's marine capture fisheries and emerging mariculture sector are vital for ensuring food and nutrition security, and livelihood support for about 4 million coastal inhabitants, besides earning foreign exchange for the country. India is the second-largest fish-producing country with around 8% share in global fish production, making it a significant player in the global seafood trade. The targeted annual seafood export turnover is to the tune of Rs one trillion.

With fish consumers—especially in developed countries—becoming more conscious about transparency and responsible sourcing, global seafood markets are increasingly demanding eco-labelled products certified as coming from sustainable, well-managed fisheries and farms.

While several international eco-labelling schemes (e.g. Marine Stewardship Council (MSC), Friend of the Sea (FoS), Aquaculture Stewardship Council (ASC), Best Aquaculture Practices (BAP)) are active or interested in India, there is currently no single national framework governing how such schemes operate in Indian waters and communities.

To safeguard sovereign resource management in its EEZ, fishing communities' rights, ecosystem health, and consumer confidence, a 'National Guidelines for Marine Ecolabelling' is proposed with the following purposes and objectives.

2. Purpose & Objectives

- To provide a national reference framework for the recognition and operation of marine products eco-labelling schemes in India.
- To ensure alignment of ecolabeling schemes with Indian fisheries laws, sustainability plans and global instruments for sustainability certification.
- To protect the interests of small-scale and traditional fishers and enable their participation in certification.
- To provide clarity and accord legitimacy of operations to certification schemes, buyers

and investors by prescribing precautionary principles, permissible practices and oversight requirements.

- To ensure that eco-labels contribute to stock conservation, equitable benefits, and fair market access, rather than fragmenting or distorting national fisheries management.

3. Scope

These guidelines apply to all eco-labelling and certification programmes operating in India for certifying:

- Marine capture fisheries within Indian territorial waters and the EEZ,
- Wild-caught landings of Indian-flagged vessels operating on the high seas,
- Marine aquaculture/mariculture (e.g., cage-cultured finfish, molluscs, crustaceans) in coastal and offshore waters,
- Value-chain entities (landing centres, pre-processing and processing units, fish meal plants, exporters) seeking eco-labelled status or other similar certification status for marine fish and fish products, whether used for food or non-food purposes.

4. Guiding Principles

Alignment with Indian law & sovereignty:

All certification activities must comply with national and state fisheries regulations, biodiversity and wildlife protection laws, CAA regulations, and FSSAI seafood safety requirements.

Transparency & accountability:

Schemes must publish standards, indicators, scoring methods, and audit summaries; provide timely data to Indian authorities.

Respect for fishing communities' rights:

Certification must not restrict legitimate, traditional and artisanal access; and be based on active consultations with local fishers' cooperatives/associations during pre-assessment and incorporation phases to ensure equity of access and stakeholder participation.

Scientific credibility & ecosystem-based approach:

The ecolabeling schemes must reflect the guidelines and standards set by international instruments such as Ecolabelling Guidelines (marine capture) & FAO Aquaculture Guidelines; and other norms established by the FAO Code of Conduct for Responsible Fisheries (CCRF), International Organisation for Standardisation (ISO), the International Social and Environmental Labelling and Accreditation Alliance (ISEAL) and the World Trade Organisation (WTO). The Schemes must make use of the best available science, in consultation with relevant scientific

and civil society organisations, consider stock status based on internationally accepted reference standards, and be sensitive to bycatch, ETP species, habitat, and ecosystem effects.

Fair access & non-discrimination:

Schemes shall provide accessible pathways such as group certification, stepwise improvement programmes, or government-supported pre-assessments for ensuring fair access to small-scale fisheries and those fisheries that experience data limitations.

Non-exclusion of legitimate stakeholders:

The schemes should be voluntary in nature and market-driven. As long as the fishery under consideration for certification bears the fundamental properties of an open access/common property regime, the benefits arising from such certification may remain inclusive to all legitimate stakeholders to the extent possible.

Labour safeguards and occupational safety:

Certification must include baseline requirements for legal compliance in labour, occupational safety, onboard communication, and distress alerting, as well as decent work in line with the ILO, Indian labour codes, and other national and international occupational safety guidelines and protocols.

Traceability & chain of custody:

Verifiable chain-of-custody audits must back certified claims; data must be compatible with available national electronic catch documentation and traceability systems.

Cost-effectiveness & avoidance of duplication:

Encourage mutual recognition and benchmarking to reduce audit burdens where schemes have equivalent requirements.

Data sharing & cooperation:

Schemes to share fishery and environmental data generated during assessments with Indian research institutes (e.g., ICAR-CMFRI, FSI) to support management.

Contribution to national goals:

Eco-labelled fisheries/farms should align with India's Blue Economy Roadmap, SDG-14, and climate-smart fisheries strategies.

5. Institutional Framework

To grant operational recognition for the certification schemes, the Government of India may establish a National Marine Eco-Labeling Steering Committee (NMESC), under the Department of Fisheries, Animal Husbandry and Dairying (DoF), with representatives from:

- Coastal State/UT fisheries departments
- Marine Products Export Development Authority (MPEDA)
- Food Safety and Standards Authority of India (FSSAI)
- Coastal Aquaculture Authority (CAA)
- Ministry of Environment, Forest and Climate Change (MoEF&CC) (for biodiversity)
- Research institutes (ICAR-CMFRI, ICAR-CIFT, ICAR-CIBA, FSI)
- Bureau of Indian Standards (BIS)
- Small-scale fisher cooperatives
- Processors/exporters and certification experts
- Relevant civil society organisations (ICSF, SIFFS)

Recognition procedure:

Potential Eco-label schemes may apply for recognition, along with details of the standards, procedures, and evidence of compliance with these guidelines. The NMESC will evaluate the proposals and may grant Provisional or Full Recognition.

A periodic review of the same may follow every 3/5 years.

6. Operational Requirements for Certification Schemes

Pre-engagement notification:

Schemes must notify the DoF before starting assessments in Indian fisheries/farms. The 'unit of certification' may be a fishery operated legally in accordance with Indian laws and regulations that specify its target stocks and fishing methods under recognised management rules of the territorial/state governments. The certification schemes must obtain valid permission/approval from relevant RFMOs/international fishery management organisations if the stocks under consideration for certification are transboundary / straddling / highly migratory in nature.

Well-defined standards of certification:

The schemes should operate based on pre-determined and well-defined standards of certification, which include (i) codal formalities and procedures for assessing a fishery based on the principles of 'sustainability of stocks', 'ecosystem conservation', 'environmental integrity', and 'good governance' and (ii) separate complementary standards of chain of custody (CoC). The CoC certification must cover all entities involved in the processing and distribution of certified fishery products and products manufactured using certified fishery products as raw materials.

Well-defined rules of inclusion/exclusion:

The benefits arising from the certification schemes may be made inclusive to all legitimate members of the certified fishery by putting in place appropriate rules/by-laws, but with suitable provisions to ensure cost-sharing. A claimant to such benefits may be deemed ineligible only if it is proved so as per the law of the land.

Consultation & free, prior, informed consent (FPIC):

The operational schemes may obtain free, prior, informed consent of fishing communities and cooperatives.

Audit integrity:

The schemes may only use accredited third-party auditing firms; auditors to be qualified in Indian fisheries.

Public reporting:

The listed schemes may publish detailed assessment reports (stock status, ecosystem impact, social safeguards) at regular intervals.

Continuance of the certification schemes:

The onus of ensuring continuity of the scheme beyond its first phase of certification rests primarily with the beneficiaries of the scheme.

Appeals & grievance mechanism:

All certification schemes must have accessible grievance redress mechanisms in place for fishers, processors, and civil society.

Use of logo/claims:

Eco-label claims must be limited to certified species, areas and products; misuse will be subject to penalties under FSSAI / Consumer Protection Act/ other relevant national legislations.

Data protection & sharing:

The schemes should comply with Indian data-sharing norms while respecting confidentiality.

Improvement pathways:

The schemes are encouraged to partner with government/NGOs to develop Fisheries or Aquaculture Improvement Projects (FIPs/AIPs) for non-certified but improving sectors.

7. Role of Government & Support Measures

Within the scope of this framework, the government of India is committed to ensuring a supportive ecosystem for the smooth implementation of the certification schemes with the following key elements:

- Provide baseline management measures (science-based harvest controls, vessel licensing, MCS) necessary for ecolabel eligibility.
- Facilitate capacity-building, training and cost-sharing (only in case of community-backed certification schemes) for small-scale fishers and cooperatives to meet ecolabel standards.
- Promote research & stock assessment to close data gaps.
- Maintain a national traceability platform to interface with private schemes' chain-of-custody.
- Encourage recognition of credible international schemes (e.g. MSC, ASC, FoS, BAP) that comply with this guideline, while exploring an indigenous 'Marine Eco-Label' scheme for domestic recognition, as well as to secure equivalence for the same in international markets.
- For all matters related to transparency, conflicts of interest and disputes among parties concerned, the Government of India or an agency/authority notified may act as the final point of resolution.

8. Monitoring & Compliance

The NMESC will maintain a public registry of recognised schemes, certified fisheries/farms, CABs and the status of certifications in India. The DoF & coastal State departments will integrate certification performance into national fisheries reports from time to time based on scientific evaluations with the help of research and academic institutions. Appropriate mechanisms will be put in place to ensure that non-compliant schemes may face suspension or withdrawal of recognition. If necessary, new legislative instruments will be introduced at appropriate levels to ensure legal sanctity for the framework and its extended jurisdictions of operation.

9. Review & Updates

The Guidelines are to be reviewed every 5 years or earlier if required, in consultation with key stakeholders and in line with updates to FAO guidelines, international trade rules, or national fisheries policies.

Annexure I

Ecolabelling in Marine Fisheries: An overview

Ecolabelling for common-pool resources like marine fish is a market-based mechanism to ensure that the marketed product is sourced from a sustainable ecosystem, thereby acting as a market-centric tool to address the “tragedy of the commons”. Ecolabelling provides an economic incentive for sustainable behaviour from stakeholders and value chain actors, but its effectiveness is often debated, and depends heavily on how it is implemented in a fishery.

Marine fisheries are a classic example of a common-pool resource (CPR), which is rivalrous (one person’s use diminishes another’s) but non-excludable (it is difficult to prevent people from using it). The “tragedy of the commons” occurs because each user has a private incentive to harvest as much as possible, while the costs of resource depletion are shared by all. This can lead to overexploitation and resource collapse, and in turn cause disequilibrium in demand and supply forces in the market.

The concept of ecolabelling is anchored as a means to avert such market failure by informing the ecologically concerned consumers whether the fish offered for sale in the market was caught sustainably or not. Ecolabels, such as those of the Marine Stewardship Council (MSC) and Friend of the Sea, serve as a credible signal from third-party certifiers that the product meets environmental standards. By allowing producers to differentiate their products, ecolabelling creates market access and potential price premiums for sustainably harvested fish. This incentivises producers to adopt better management practices to maintain or increase profits. When consumers choose ecolabeled products, they influence market demand toward sustainable options. This rewards responsible producers and creates pressure for others to follow suit.

In a nutshell, an ecolabel is assumed to extend three types of economic incentives, which include (i) premium prices for the fishers for adhering to sustainable fishing practices (ii) government has the incentive to upgrade fisheries management practices and monitor the health of fish stocks, and (iii) the food chain fraternity can derive better market access and avoid any reputational risks associated with the food they deal with.

Ecolabel, making a distinction from conventional labels which indicate origin and quality of the content of products, derives its utility as a market instrument based on ecological sustainability as a source of economic and ethical value addition. It provides information on the environmental impact of the product. This is different from conventional food safety labels, like the absence of harmful chemicals, as in the case of organic farm products. Though organic certification also considers the eco-friendliness of the production process, the consumer is more attracted by the food safety benefit than the ecosystem benefit.

Approaches for ecolabelling

Ecolabelling is done based on a set of standards that define fisheries sustainability and an assessment protocol. Price premium in the export market is the USP of such schemes. A certificate is issued to a group of operators in the fishery for a fee and a period. The cost of management is generally borne by the state or the community.

Three distinct commonly practised methods for ecolabelling of a product include (i) Self-declaration by a fisher or a fisherfolk group; however not be feasible in an open-access fishery, (ii) State declaration subject to third-party verification and equivalence (Eg: EU Ecolabel, France AgriMer) (iii) Labels promoted by industry groups / retail groups, and (iv) Private/third-party certification (Eg: MSC; Friend of the Sea, other NGOs).

Conditions of success

The success of an ecolabel rests on a number of factors. It is most suitable when the resource in question does not experience a boundary conundrum; i.e., the resource area considered for the label is of a confined nature. It is also easier to implement when the number of harvesters is limited, so that there is easy traceability of the chain of custody (CoC), clear guidelines for benefit sharing, and equity implications can be monitored easily.

The management regime for the resource needs to be closely-knit with a semblance of privatisation, such that rules of administration and governance are simple and direct, more based on consensus, leading to quick ascent to management efforts. Above all, the resource under consideration needs to be of relatively higher value, often demanded by affluent consumers who can afford to pay a premium for ecosystem sustainability initiatives.

Criticisms and challenges of ecolabelling

Despite the theoretical benefits, ecolabelling faces several economic challenges in practice:

High costs: The costs of certification and compliance with stringent environmental standards can be prohibitive, especially for small-scale fisheries or producers in developing countries. This can create unfair barriers to market entry.

Trade barriers: Third-party ecolabelling schemes can be based on market incentives and international consumer consciousness, potentially acting as a non-tariff trade barrier for small fisher groups that are incapable of complying with the underlying conditions of entry. Further, if monopolised by a few leading certifying agencies, there is a threat of the ecolabel becoming a condition for market access, and therefore acting as a potential trade barrier.

Consumer confusion: The proliferation of different ecolabels can confuse consumers, undermining the trust and market signals that the labels are intended to provide.

Limited market impact: The success of ecolabelling relies on a critical mass of consumers willing to pay a premium for certified products. If consumer awareness and willingness-to-pay

are low, the market incentives for producers will be weak. Further, certification can remain limited to a few high-value products like shrimp and squid alone, thereby failing to bring about the stated sustainability objectives.

“Free-riding” and incomplete coverage: Voluntary schemes allow some producers to “free ride” on the improved reputation of the industry without incurring certification costs. Since ecolabelling typically covers only a fraction of the total catch, it may not be sufficient to address the overall problem of overfishing.

The need for a broader policy mix

Economists and policymakers argue that ecolabelling should not be considered a standalone solution but rather a complement to other management strategies. In addition to market mechanisms, robust government regulations and strong enforcement are essential for managing common-pool resources. As Nobel laureate Elinor Ostrom demonstrated, many communities have successfully self-regulated common resources through collective action without needing privatisation or top-down government control. Effective management often involves a mix of policies, including subsidies for sustainable practices, penalties for overexploitation, and educational campaigns to increase consumer awareness.

Ecolabelling can be a powerful driver for sustainability when conditions are right, but it also has limitations and must be viewed as part of a broader, holistic strategy that combines market-based incentives with strong institutional management, stakeholder participation and consumer engagement. A strong set of guidelines that honour the guiding principles of a natural resource economy, like resilience, optimisation, subsidiarity, inclusive growth, participatory governance, equity, and justice, is necessary while introducing ecolabelling in a fishery.

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