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Title: DNA barcoding reveals substitution of Sablefish (*Anoplopoma fimbria*) with Patagonian and Antarctic Toothfish (*Dissostichus eleginoides* and *D. mawsoni*) in online market in China: how mislabeling opens door to IUU fishing

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Abstract: China's rapid economic development has determined profound changes in seafood consumption patterns, and nowadays besides the traditional luxury seafood, high-quality marine fish are consumed. Among these is *Anoplopoma fimbria* (Sablefish), a highly priced species on the Chinese market. A recent molecular survey on products sold online in China found that all the analyzed products sold as Yin Xue, used to indicate *A. fimbria*, were instead *Dissostichus* spp., a genus of fish extremely vulnerable to overfishing (Xiong et al. 2016). Considering this and the lack of a standardized naming system for seafood species in China, an initial search was conducted to identify all the possible Chinese names indicating *A. fimbria*. The aim of the present study was to assess the challenges of the online market with regards to frauds for fish species substitution. DNA barcoding was employed to verify the identity of 42 products sold on e-commerce platforms as Sablefish. Moreover, the information reported on the webpage and on the label was analyzed according to the Chinese regulation in force. All the PCR products gave readable sequences. By using the IDs analysis on BOLD and the BLAST analysis on GenBank all the samples were unambiguously identified at the species level. Of the 42 products sold as Sablefish, only 6 (14.3%) were molecularly identified as this species, while 32 (76.2%) were identified as *Dissostichus eleginoides* (Patagonian Toothfish) and 4 (9.5%) as *D. mawsoni* (Antarctic Toothfish), highlighting an alarming overall misrepresentation rate of 85.7% and implications for the management of these species' fisheries. The combined analysis of all the information of the webpages and the labels allowed us to hypothesize unintentional and intentional mislabeling. Our findings suggest the possible existence of a trade pattern enabling IUU fishing operators to launder illegal catches of Toothfish through mislabeling.



Dear Editor,

we would like to submit the following manuscript for possible publication: ***“DNA barcoding reveals substitution of Sablefish (*Anoplopoma fimbria*) with Patagonian and Antarctic Toothfish (*Dissostichus eleginoides* and *D. mawsoni*) in online market in China: how mislabeling opens door to IUU fishing”***

The substitution of high-quality fish species with less expensive ones becomes quite easy in processed products due to the lack of the essential characteristics necessary for their morphological identification. In this context, the accurate labeling of seafood species plays an important role in protecting consumers. While in Western countries, and in particular in the European Union, seafood traceability has reached high standards level, China still has many shortcomings in the management of the fishery chain. In particular, it still lacks of specific mandatory provisions for the labeling and of an official reference list of seafood trade names. Moreover, processing countries, such as China, are at high risk for laundering of illegal catches into legitimate markets.

Nowadays, in China, marine fish are highly requested from the consumers. Among these ,a valuable species recently appreciated in China is *Anoplopoma fimbria*. Some of the Chinese names used to indicate this species often contains the term *Xue* that in China is used for Cod products, probably to make the products more appealing. In fact, the use of the term *Xue* creates the false impression of belonging to cod fish, which is highly appreciated. In addition, the chaotic use of these denominations could be further enhanced by the emerging online market, a novel business model which is experiencing a very rapid growth in China.

A recent molecular survey on Cod products sold online in China (Xiong et al., 2016 Food Control, 60, 519-532), found out that all the analyzed products sold as *Yin Xue*, one of the term used to indicate *A. fimbria*, were in fact *Dissostichus* spp., a genus of Antarctic ground fish extremely vulnerable to overfishing. Then, also considering that recent reports on IUU fishing of *Dissostichus* spp. suspected of having China as its final market destination, we employed the DNA barcoding of a ~655bp region of the mitochondrial cytochrome c-oxidase I (*COI*) to verify the identity of 42 products sold on e-commerce platforms with different Chinese names used for *A. fimbria*.

Of these products only 14.3% were molecularly identified as *A. fimbria*, while 32 76.2% were identified as *Dissostichus eleginoides* (Patagonian Toothfish) and 9.5% as *D. mawsoni* (Antarctic Toothfish), highlighting an alarming overall misrepresentation rate of 85.7% and implications for the management of these species' fisheries.

Best regards

Andrea Armani

Dear Editor,

We are sending you back the revised version of the manuscript entitled *“DNA barcoding reveals substitution of Sablefish (*Anoplopoma fimbria*) with Patagonian and Antarctic Toothfish (*Dissostichus eleginoides* and *D. mawsoni*) in online market in China: how mislabeling opens door to IUU fishing”*.

Thank you for considering the manuscript for publication after minor revision. The manuscript has been revised according to the suggestion of reviewer 2. In particular, the section Results and Discussion has been shortened as possible (it was originally 4467 words while now it is 3455 words). We think that a further reduction of the section will negatively affect the clarity and the overall quality of the manuscript.

Reviewers' comments:

Reviewer #2: The authors have conducted a good review of their manuscript, incorporating most suggestions. However, I still think that their discussion is too long, therefore, I suggest they focus on the main point, avoiding themes not related with the main goals of their manuscript.

1 **DNA barcoding reveals substitution of Sablefish (*Anoplopoma fimbria*) with**  
2 **Patagonian and Antarctic Toothfish (*Dissostichus eleginoides* and *D. mawsoni*) in**  
3 **online market in China: how mislabeling opens door to IUU fishing**

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30 **Abstract**

31 China's rapid economic development has determined profound changes in seafood  
32 consumption patterns, and nowadays besides the traditional luxury seafood,  
33 high-quality marine fish are consumed. Among these is *Anoplopoma fimbria*  
34 (Sablefish), a highly priced species on the Chinese market. A recent molecular survey  
35 on products sold online in China found that all the analyzed products sold as Yin Xue,  
36 used to indicate *A. fimbria*, were instead *Dissostichus* spp., a genus of fish extremely  
37 vulnerable to overfishing (Xiong et al. 2016). Considering this and the lack of a  
38 standardized naming system for seafood species in China, an initial search was  
39 conducted to identify all the possible Chinese names indicating *A. fimbria*. The aim  
40 of the present study was to assess the challenges of the online market with regards to  
41 frauds for fish species substitution. DNA barcoding was employed to verify the  
42 identity of 42 products sold on e-commerce platforms as Sablefish. Moreover, the  
43 information reported on the webpage and on the label was analyzed according to the  
44 Chinese regulation in force. All the PCR products gave readable sequences. By using  
45 the IDs analysis on BOLD and the BLAST analysis on GenBank all the samples were  
46 unambiguously identified at the species level. Of the 42 products sold as Sablefish,  
47 only 6 (14.3%) were molecularly identified as this species, while 32 (76.2%) were  
48 identified as *Dissostichus eleginoides* (Patagonian Toothfish) and 4 (9.5%) as *D.*  
49 *mawsoni* (Antarctic Toothfish), highlighting an alarming overall misrepresentation  
50 rate of 85.7% and implications for the management of these species' fisheries. The  
51 combined analysis of all the information of the webpages and the labels allowed us to  
52 hypothesize unintentional and intentional mislabeling. Our findings suggest the  
53 possible existence of a trade pattern enabling IUU fishing operators to launder illegal  
54 catches of Toothfish through mislabeling.

55

56 **Keywords:** Sablefish, *Anoplopoma fimbria*, Toothfish, *Dissostichus* spp. Chinese  
57 E-commerce, Seafood frauds, DNA barcoding, Species identification, Illegal  
58 Unreported and Unregulated (IUU).

59 **1. Introduction**

60 China's rapid economic development has determined profound changes in seafood  
61 consumption patterns, and nowadays besides the traditional luxury seafood (such as  
62 abalone, shark fin, sea cucumber and fish maw), also high-quality marine fish (such as  
63 salmon, cod and tuna) are consumed. However, the internal production of these  
64 species from aquaculture and catches is insufficient to cover their consumption  
65 (Xiong et al., 2016a), thus currently most of the demand is met by importation  
66 (Fabinyi, 2016; Fabinyi & Liu, 2014; Lindkvist, Trondsen & Xie, 2008).

67 Among the valuable marine fish species recently appreciated in China is  
68 *Anoplopoma fimbria*, a commercially important ground fish distributed in the  
69 Northeastern and Northwestern Pacific (Stewart, Thorson & Wetzel, 2011). Japan is  
70 the world's largest importer and consumer of this fish, with an average consumption  
71 of 26,900 metric tons per year during 1987-2012, which corresponds to 88% of the  
72 world's *A. fimbria* production in that period. *A. fimbria* has been recently appreciated  
73 also in China where, in 2013, 212 metric tons were imported from the USA,  
74 accounting for 2.5% of its total exportation (Sonu, 2014). China today ranks 7<sup>th</sup>  
75 among the top importing countries (Grilly, Reid, Lenel, & Jabour, 2015). The market  
76 appealing of this species is reflected by its high price that exceeds 100 euro per kg in  
77 Chinese supermarkets (author's note).

78 In the globalized seafood supply chain substitution of high-value species with less  
79 expensive ones, or abuse of vernacular seafood names to confuse consumers (Armani  
80 et al., 2015a; Cawthorn, Steinman, & Witthuhn, 2012; Khaksar et al., 2015) become

81 quite easy. This confusion is further enhanced by the difficulty in visual identification  
82 of processed seafood products (Armani et al., 2013) and by the complex pathways  
83 they follow to reach the final market destination (Bellmann, Tipping, & Sumaila,  
84 2015).

85 The European Union (EU) has adopted a complex set of rules aimed at ensuring  
86 control of the fishing fleet and full traceability of fish and fish products, which are set  
87 out in two separate sections: the EU Control Regulation (CR) (Council Regulation (EC)  
88 No. 1224/2009) and the Common Organization of the Markets in Fishery and  
89 Aquaculture Products Regulation (COM) (Regulation (EU) No 1379/2013). Their  
90 common goal is to guarantee safe supply for processing enterprises and consumers, in  
91 spite of aggravated market conditions and an increasing scarcity of resources in the  
92 Community waters (UK Department for Environment, Food & Rural Affairs 2013). In  
93 particular, the CR regulates traceability and labelling for domestic fishing products to  
94 be disclosed in all the points of the supply chain. Complementarily, COM establishes  
95 the compulsory information (in particular the scientific name, the corresponding  
96 commercial denomination, the production method, the catch/farm area and the  
97 category of the fishing gear) that must be reported on the label of seafood products  
98 with the aim to inform final consumers and regardless from their origin (D'Amico et  
99 al., 2016).

100 In addition, in order to ensure that no Illegal, Unreported and Unregulated (IUU)  
101 fishing products enter the Community market or markets supplied from the Union, the  
102 EU introduced the IUU Regulation, which applies to all fishing vessels, under any flag



103 and in all maritime waters (Commission Regulation (EC) No 1010/2009; Council  
104 Regulation (EC) No 1005/2008). The Regulation seeks to ensure full traceability of all  
105 marine fishery products traded within the Community by means of a Catch  
106 Certification Scheme (CCS), mandatory for fishery products to be imported into the  
107 EU, declaring that the catch was made in accordance with applicable laws, regulations  
108 and international conservation and management measures (Leroy, Galletti, &  
109 Chaboud, 2016).

110 On the contrary, China is still in a development stage of seafood traceability  
111 (D'Amico et al., 2014) and the absence of a standardized seafood nomenclature as well  
112 as the unfamiliarity of Chinese consumers, Food Business Operators (FBOs) and  
113 Official Authorities with the new imported marine species can further foster  
114 mislabeling (Xiong et al., 2016b). Moreover, processing countries, such as China, are  
115 at high risk for laundering of illegal catches into legitimate markets (Clarke, 2010).  
116 Previous surveys conducted on Chinese products highlighted chaotic labeling (Armani  
117 et al., 2012; Armani et al., 2015b), with misrepresentation rates reaching 100% and  
118 substitution with potentially toxic species, such as *Lagocephalus* spp. (Armani et.,  
119 2015b; Shen et al., 2014; Xin-guang et al., 2013; Xiong et al., 2016b).

120 FAO 3-alpha code nomenclature for fish species sets the basis for species  
121 identification, global fisheries data collection and statistics, and seafood traceability  
122 (<http://www.fao.org/fishery/collection/asfis/en>). Nonetheless, the list of codes and  
123 relative names (commercial and/or scientific) is still incomplete at international level  
124 (Xiong et al., 2016a).

125 For *A. fimbria*, indicated as Sablefish in English, there is no equivalent  
126 nomenclature in pinyin while many Chinese names are used for this species (Table 1).  
127 Some of these names, which often contain the term *Xue* that in China is used for Cod  
128 products, are quite recognizable and appealing. In fact, the use of *Xue* creates the  
129 false impression of belonging to cod fish, which is highly appreciated by consumers  
130 (Xiong et al., 2016b).

131 The chaotic use of these denominations could be further enhanced by the  
132 emerging online market, a novel business model (Turban, King, Lee, Liang & Turban,  
133 2015) which is experiencing a very rapid growth: in 2013, the Chinese online retail  
134 market became the biggest worldwide in terms of sale volume (China Internet Network  
135 Information Center 2014). Several e-commerce platforms in China can provide access  
136 to seafood and nowadays an Alaskan lobster is just a click-mouse away from Chinese  
137 consumers (Noble, 2015). On November 11<sup>th</sup> 2013 more than \$1 million USD of  
138 USA seafood, including Sablefish, were sold on China's e-commerce website Tmall  
139 through Alibaba's Singles' Day Promotion (Peavey, 2013). However, when buying  
140 seafood online, customers do not have a chance to physically evaluate the product and  
141 the website serves to convey the information to the consumer (Rahimnia &  
142 Hassanzadeh, 2013). Thus, the peculiar characteristic of the e-market may foster  
143 frauds and misrepresentation (Xiao & Benbasat, 2011; Xiong et al., 2016b). A recent  
144 molecular survey on Cod products sold online in China (Xiong et al., 2016b), found  
145 out that all the analyzed products sold as *Yin Xue*, one of the term used to indicate *A.*  
146 *fimbria* (Table 1), were in fact *Dissostichus* spp., a genus of Antarctic ground fish

147 extremely vulnerable to overfishing (Norse et al., 2012). On the basis of these results,  
148 supported also by the recent reports of Illegal, Unreported and Unregulated (IUU)  
149 fishing of *Dissostichus* spp. suspected of having China as its final market destination  
150 (Cornax pers. comm.; Pala, 2015;  
151 <http://oceana.org/press-center/press-releases/record-breaking-fines-imposed-beneficia>  
152 [ries-illegal-fishing](#)), the existence of a flux of illegally sourced fishes fraudulently sold  
153 on the Chinese market was speculated. Connections between mislabeling and IUU  
154 fishing have already been described (Pramod, Nakamura, Pitcher & Delagran, 2014).

155 In this study, the DNA barcoding of a ~655bp region of the mitochondrial  
156 cytochrome c-oxidase I (*COI*) gene (Full DNA Barcoding, FDB), one of the most used  
157 molecular approaches to verify the authenticity of seafood products (Armani et al.,  
158 2015a; Cawthorn, et al., 2012; Zhang & Hanner, 2012), was employed to verify the  
159 identity of the products sold on e-commerce platforms with different Chinese names  
160 used for *A. fimbria* (Table 1) and to assess the challenges of the online market with  
161 regards to frauds for fish species substitution. In particular, we speculated the causes  
162 of mislabeling and we highlighted the need for the enforcement of a Chinese  
163 traceability system, able to increase the trade transparency and close the markets to  
164 IUU products. Finally, the potential impact of mislabeling for the conservation of  
165 *Dissostichus* spp. was addressed.

## 166 **2. Materials and method**

### 167 **2.1 Sampling**

168 Initially, a search to identify all the possible Chinese names used to indicate *A.*

169 *fimbria* was conducted (Table 1). The four Chinese names found were then used as the  
170 key words to search for products on the Business to Customer (B2C) platform.  
171 Forty-two samples were purchased from one of the largest B2C online platforms in  
172 China. The results of each search were displayed subdivided by online vendors,  
173 which were ranked on the basis of their overall monthly transaction volume (from  
174 large to small).

175 Thirty-three 银鳕 (Chinese pinyin *Yin Xue*) products from the top 23 vendors, 7 黑  
176 鳕鱼 (*Hei Xue Yu*) products from the top seven vendors and 2 裸盖鱼 (*Luo Gai Yu*)  
177 products from the only 2 vendors retrieved were selected (Table 2). No results were  
178 retrieved searching for 裸头鱼 (*Luo Tou Yu*). Once ordered, the products arrived in  
179 Nanjing (China) within the next two days by the express cold-chain logistics system.  
180 The received products consisted in frozen single or multiple slices (40) or heads (2)  
181 (Fig. 1). In the laboratory, all the 42 frozen products (Table 2) were registered,  
182 labeled with an internal code and stored at -20°C until further analysis.

## 183 **2.2 Molecular analysis**

184 **2.2.1 DNA extraction.** Total DNA extraction was performed following (Andrea et  
185 al., 2014). DNA quality and concentration were determined using a NanoDrop  
186 ND-2000C spectrophotometer (NanoDrop Technologies, Wilmington, DE, US). For  
187 each sample, a standard working concentration of 100 ng/μl was prepared. One  
188 thousand nanograms of the total DNA was electrophoresed on 1% agarose gel  
189 (Biowest Regular Agarose G-10, Shanghai, China) stained with ethidium bromide,  
190 and visualized via ultraviolet transillumination. DNA fragment size was estimated by

191 comparison with the standard 100 bp DNA Ladder (Vazyme, Nanjing, China) by  
192 visualizing on Molecular Imager® Gel Doc™ XR System (BIO-RAD, California,  
193 US).

194 *2.2.2 Amplification and sequencing of the full-COI barcode (FDB).* The DNA  
195 samples were amplified using the universal primers proposed by (Handy et al., 2011),  
196 for the amplification of a FDB of the *COI* gene. The PCR reactions were performed in  
197 a final reaction volume of 40 µl, containing 8 µl of a 5× buffer (Takara, Nanjing,  
198 China), 200 µM of each dNTP (Takara, Nanjing, China), 100 nM of each primer  
199 (Genscript, Nanjing, China), 0.5 U of PrimesSTAR® GXL DNA Polymerase (Takara,  
200 Nanjing, China), 200 ng of DNA and DNase free water. The amplification program  
201 involved an initial denaturation step at 94°C for 3 min, followed by 45 cycles at 94°C  
202 for 30s, 53°C for 30s and 72°C for 35s and final extension at 72°C for 10 min. The  
203 amplicons were then separated by electrophoresis on a 2% agarose gel (Biowest  
204 Regular Agarose G-10, Shanghai, China) stained with ethidium bromide. The  
205 presence of the expected amplicon was assessed by a comparison with the standard 100  
206 bp DNA Ladder (Vazyme, Nanjing, China) by visualizing on Molecular Imager® Gel  
207 Doc™ XR System (BIO-RAD, California, US). PCR products were sent to the  
208 company GenScript (Nanjing, China) for purification and sequencing using ABI 3730  
209 DNA sequencer (Applied Biosystems Division, Foster City, USA).

210 *2.2.3 Post-sequencing data analysis and comparison of the molecular results with*  
211 *the databases.* The sequences obtained were visualized, aligned and edited with  
212 BioEdit program version 7.0.9 (Hall, 1999). Fine adjustments were manually made

213 after visual examination. The generated *COI* sequences were analyzed using the  
214 Identification System (IDS) on BOLD (Species Level Barcode Records)  
215 ([http://www.boldsystems.org/index.php/IDS\\_OpenIdEngine](http://www.boldsystems.org/index.php/IDS_OpenIdEngine)) and using the Basic  
216 Local Alignment Search Tool (BLASTn) on GenBank,  
217 (<http://blast.ncbi.nlm.nih.gov/Blast.cgi>). A top match with a sequence similarity of at  
218 least 98% was used to designate species identification. Since the *COI* sequences  
219 obtained in this study were not derived from voucher samples or expert-identified fish  
220 specimens, the sequences were not submitted to any international database.

### 221 *2.3 Analysis of the information reported on the website and on the label and* 222 *comparison with the molecular results*

223 The information available on the website was assessed in the light of the  
224 requirements established by the selected B2C platform themselves. In particular, the  
225 heading of the product webpage and the information reported in the product  
226 description were analyzed. The label information reported on prepackaged products  
227 were assessed according to the Chinese general mandatory National Standard  
228 *General Rules for the labeling of prepackaged foods* (GB7718-2011), while those of  
229 in-bulk products were assessed according to the Law of the People's Republic of  
230 China on Quality and Safety of Agricultural Products  
231 ([http://www.npc.gov.cn/englishnpc/Law/2008-01/02/content\\_1387986.htm](http://www.npc.gov.cn/englishnpc/Law/2008-01/02/content_1387986.htm)).

232 All the information was translated to English by a native Chinese speaker, also with  
233 the use of multimedia translation tools (Google Translator; Word of Reference).  
234 Finally, the accuracy of the information reported on the website and on the received

235 product, paying particular attention to the commercial and scientific denominations  
236 and the geographical origin, was verified in the light of the molecular identification  
237 of the products, and the misrepresentation rate was calculated.

### 238 **3. Results and discussion**

#### 239 **3.1 Sampling**

240 A preliminary survey was conducted to investigate the names used to indicate *A.*  
241 *fimbria*, and identify the key words to search for the products online. The  
242 Latin-Chinese Dictionary of Fish Names, , reports 银鳕 (Chinese pinyin *Yin Xue*) and  
243 裸盖鱼 (*Luo Gai Yu*) as the Chinese names for *A. fimbria* (Latin-Chinese Dictionary  
244 of Fish Names, 2016). The Guideline of the Center for Food Safety of Hong Kong  
245 (Centre for Food Safety of Hong Kong, 2007) specifies *Yin Xue* as the Chinese  
246 common name in the market and *Luo Gai Yu* in scientific literature. In addition, the  
247 guideline specifies that *Yin Xue* can be used only if an additional term such as *A.*  
248 *fimbria*, *Luo Gai Yu* or Sablefish is reported (Centre for Food Safety of Hong Kong,  
249 2007), considering that the term *Xue* would create the false impression of belonging to  
250 cod fish (Xiong et al., 2016b).

251 Fishbase (<http://www.fishbase.org/>) and Wikipedia  
252 (<http://zh.wikipedia.org/wiki/Wikipedia>) confirm these names and also provide 裸头  
253 鱼 (*Luo Tou Yu*) as another name for this species. Moreover, some online rumors  
254 claimed the acceptability of 黑鳕鱼 (*Hei Xue Yu*, which can be literally translated as  
255 Black Cod) for *A. fimbria* as well  
256 ([http://blog.sina.com.cn/s/blog\\_546be44c0101ghm7.html](http://blog.sina.com.cn/s/blog_546be44c0101ghm7.html)).

257 Totally, the search for *Yin Xue* produced 193 results distributed in 107 online  
258 vendors (accessed on 23<sup>th</sup> May 2015). These numbers decreased to 132 results in 50  
259 vendors for *Hei Xue Yu* and 2 products in 2 vendors for *Luo Gai Yu*. As mentioned, no  
260 results were found searching for *Luo Tou Yu*

261 The 42 frozen products analyzed in this study were selected ranking the monthly  
262 transaction volume of the online vendors. Only the vendors with a monthly  
263 transaction volume higher than 1 were selected for *Yin Xue* and *Hei Xue Yu*, while for  
264 *Luo Gai Yu* only 2 vendors were found, so samples were purchased from both of them,  
265 even though the monthly transaction volume of one of them was 0. The monthly  
266 transaction volume (despite overstated sometimes) of the *Yin Xue* products ranged  
267 from 2033 pieces to 1 piece (average 237). The price was also quite variable, from  
268 78.8 to 11 Euro/kg (average 42.8 Euro/kg) (Table 2). *Hei Xue Yu* products presented  
269 lower monthly transaction volumes (from 118 to 1, average 29) and were sold at  
270 59.5-38.7 Euro/kg (average 47.1 Euro/kg). The price of one *Luo Gai Yu* product with  
271 a monthly transaction volume of 42 pieces was 36.7 Euro/kg, while the other one  
272 with a monthly transaction volume of 0 pieces had a higher price (58.2 Euro/kg)  
273 (Table 2). The prices of the collected samples were very high and comparable with  
274 those of the highest quality fish species such as Tuna, Grouper (Fabinyi & Liu, 2014)  
275 and even Toothfish (Grilly et al., 2015). **3.2 DNA extraction and amplification**

276 The total DNA was successfully extracted from all the samples and showed good  
277 quality after spectrophotometric and electrophoretic analysis. In fact, a FDB was  
278 amplified from all the 42 sampled products, giving an overall amplification success of



279 100%.

### 280 **3.3 Sequences analysis and comparison with BOLD and GenBank databases**

281 All the PCR products gave readable sequences. The sequence length and quality  
282 were analyzed first on the raw data and then after trimming at the 5' and 3' end,  
283 according to (Handy et al., 2011). The overall raw average length was 695bp  
284 (713-405bp), while the average length of the trimmed sequences was 628bp  
285 (655-318bp).

286 By using the IDs analysis on BOLD, a maximum species identity in the range of  
287 98–100% was obtained for all 42 FDB sequences, which were unambiguously  
288 identified at the species level (Table 2). In particular, of the 33 *Yin Xue* products, 28  
289 (85%) were identified as *D. eleginoides*, other 4 (12%) as *D. mawsoni* and only 1  
290 (3%) as *A. fimbria*. Regarding the 7 *Hei Xue Yu* products, 5 (71.4%) were identified  
291 as *A. fimbria*, while 2 (28.6%) were identified as *D. eleginoides* as well as the only 2  
292 *Luo Gai Yu* products (Fig. 2). Thus, of the 42 products sold as *A. fimbria*/Sablefish,  
293 only 6 (14.3%) were molecularly identified as this species, discovering an alarming  
294 overall misrepresentation rate of 85.7%.

295 All the FDB sequences returned the same result when analyzed by BLAST  
296 analysis.

### 297 **3.4 General information reported on the webpage and on the label.**

298 **3.4.1. Webpage.** B2C, together with Consumer to Consumer (C2C), are among the  
299 most common forms of e-commerce in China. Several large e-commerce platforms  
300 are available to market seafood products, particularly the imported ones..

301 The general rules for online food market have been taken into consideration in the  
302 newly revised Food Safety Law (in force from 1<sup>st</sup> October 2015)  
303 ([http://news.xinhuanet.com/politics/2015-04/25/c\\_127731151.htm](http://news.xinhuanet.com/politics/2015-04/25/c_127731151.htm)). However,  
304 detailed requirements of the website preparation for online stores are not yet available,  
305 thus prompting each online platform in China to place their own rules. Regarding the  
306 selected B2C platform, the primary requirements for fresh seafood sold online are as  
307 follows: 1) *The heading of the product page must report at least the country of origin,*  
308 *the name of the product and the net weight (the information must be displayed in this*  
309 *order); 2) At least four photos of the product must be prepared, one of which must*  
310 *present the label of the final product, if existing; 3) The real characteristics of the*  
311 *product must be displayed.*

312 As shown in Table 2 and summarized in Table 1SM, the heading of the products  
313 were prepared following the aforesaid requirements for all the samples, with  
314 exceptions of 3 *Yin Xue* products. Regarding the product description, besides the  
315 primary requirements, which were always present, voluntarily information such as  
316 nutritional properties, the cooking method and the capture area was reported (see  
317 Section 3.7).

318 Other information voluntarily presented included: the name of producer or  
319 distributor (not specified), the sanitary certificate, the customs declaration and the  
320 certification of origin (Table 2 and 1SM). In particular, the sanitary certificate was  
321 available (even though not always readable) for 4 out of the 6 samples (66%)  
322 identified as *A. fimbria* and for 10 out of 36 samples (28%) identified as *Dissostichus*

323 spp.

324 *3.4.2. Labels.* Regarding the received samples, 16 were prepackaged products  
325 (Table 2 and 1SM). Most of them (81.2%) were correctly prepared following the  
326 requirements of GB7718-2011 (GB7718-2011). Regarding the remaining 26 products  
327 sold in bulk, totally 84.6% of them reported the information mandatorily required by  
328 the Law of the People's Republic of China on Quality and Safety of Agricultural  
329 Products. A large amount of information was also illustrated voluntarily (Table 1SM).

330 Overall, 92.8% of the headings of the product page, 100% of the product  
331 descriptions and 83% of the labels of the final received products were prepared  
332 following the aforesaid rules of the selected B2C platform (Table 1SM).

### 333 *3.5 Analysis of the denominations reported on the webpage and on the label*

334 All the details regarding the denominations displayed on the webpage (heading and  
335 description) and on the label of the received products (product name and ingredient list)  
336 are reported in Table 2 and summarized in Table 2SM.

337 *3.5.1. Webpage.* Regarding the heading of the product page, in addition to *Yin Xue*,  
338 *Hei Xue Yu* and *Luo Gai Yu*, which were often found in combination, *Xue Yu* (Codfish)  
339 and *Xiao Lin Nan Ji Quan Ya Yu* (misspelling of Toothfish) were reported.

340 All the species denominations (scientific and commercial) found in the description  
341 of the product webpage were taken into consideration (Table 2 and 2SM). A great  
342 confusion was observed for *Yin Xue* products, since many other names were claimed  
343 for 16 samples. In addition to *Hei Xue Yu*, *Luo Gai Yu*, *Luo Tou Yu*, Sablefish, Silver  
344 cod and *A. fimbria*, incongruent names such as *Xue Yu*, *Xiao Lin Nan Ji Quan Ya Yu*,

345 Patagonian toothfish, Sea bass, Cod/codfish and *D. eleginoides* were found (see  
346 Section 3.6).

347 3.5.2. *Label*. Regarding the label of the received products, the product name and,  
348 for prepackaged products only, the ingredient list were evaluated (Table 2 and 2SM).  
349 Similarly to what observed for the website description, 9 of the 33 *Yin Xue* products  
350 reported other names. Moreover, two additional denominations were found: Chilean  
351 seabass and Silver cod. Ten of the 11 prepackaged *Yin Xue* products presented an  
352 ingredient list. Half of them reported only *Yin Xue*, while one reported only *Xiao Lin*  
353 *Nan Ji Quan Ya Yu*. Regarding the residual 4 samples, in addition to *Yin Xue*, they  
354 reported *Luo Gai Yu*, Chilean seabass and Toothfish.

355 On the *Hei Xue Yu* products (Table 2 and 2SM) 5 different denominations used for  
356 *A. fimbria*. In particular, some of these products reported Black cod which is  
357 sometimes used to indicate *A. fimbria*. Comparing the species denomination on the  
358 product heading with the product description and with the label of the received  
359 products, coherent species denominations (always referable to *A. fimbria*) were  
360 observed only for 17 samples (40.5%, in grey in Table 2).

### 361 **3.6. Comparison between denominations and molecular results.**

362 The molecular analysis herein performed identified *A. fimbria* only in 6 samples  
363 (see Section 3.3) (Table 2). Therefore, 36 products were sold under a name not  
364 consistent with the species declared on the label, giving an overall misrepresentation  
365 rate of 85.7%, and specifically 97% for *Yin Xue*, 28.6% for *Hei Xue Yu* and 100% for  
366 *Luo Gai Yu* products (Fig. 2). While the overall misrepresentation rate is significantly

367 higher than the values found in China for fish maws (53.3%) (Wen et al., 2015) and  
368 sea cucumber (63.6%) (Wen, Hu, Zhang & Fan, 2011), it is comparable to the results  
369 found analyzing cod products (100%) (Shen et al., 2014; Xin-guang et al., 2013).

370 In particular, it seems that the name *Yin Xue* (also reported online for both *Luo Gai*  
371 *Yu* products) is largely abused probably to promote their sale due to its high popularity  
372 (as indicated in Section 3.3.2) in China. The present results further support what  
373 already observed in our previous survey ( Xiong et al., 2016b) in which 100% of the  
374 samples labeled as *Yin Xue* were mislabeled. Noteworthy is the fact that the lower  
375 misrepresentation rate (28.6%) was found for *Hei Xue Yu* products, although the  
376 utilization of this name for *A. fimbria* is not supported by official references (Table  
377 1).

378 Concerning the other names found in the webpage and on the label, the English  
379 names Sablefish and Black cod are also widely accepted for *A. fimbria*, even though  
380 the US seafood list suggests to avoid the use of Black cod (Table 3), while Silver cod,  
381 which is not used at international level, is a literal translation of the Chinese  
382 characters 银鳕 (*Yin Xue*) (author's note).

383 On the contrary, the other names found (Cod/Codfish, *Xue Yu*, Chilean seabass,  
384 Seabass, toothfish, *Xiao Lin Nan Ji Quan Ya Yu*, Patagonian toothfish and the Latin  
385 name *D. eleginoides*) refer to species distant from *A. fimbria* and are generally used  
386 for Codfish or Toothfish. The use of the term Cod/ *Xue* also for *A. fimbria* is probably  
387 due to the fact that at the international level this species is often referred as Black cod,  
388 Blue cod and Coal cod

389 (<http://www.fishbase.org/comnames/CommonNamesList.php?ID=512&GenusName>  
390 [=Anoplopoma&SpeciesName=fimbria&StockCode=528](http://www.fishbase.org/comnames/CommonNamesList.php?ID=512&GenusName=Anoplopoma&SpeciesName=fimbria&StockCode=528)). In fact, the name *Hei Xue*  
391 *Yu* is actually a literal translation of the English name Black cod (author's note). All  
392 the other names (Chilean seabass, Toothfish, Patagonian toothfish and *D. eleginoides*)  
393 refer to *Dissostichus* spp., according to the suggested names for this genus (Table 3).  
394 Finally, the name *Xiao Lin Nan Ji Quan Ya Yu* is actually a misspelling of *Xiao Lin*  
395 *Quan Ya Nan Ji Yu* and it also refers to *D. eleginoides* (Table 3).

### 396 **3.7 Analysis of the geographical origin reported on the webpage and on the label**

397 **3.7.1 Webpage.** As shown in Table 2, 1SM and 2SM, 39 samples (93%) reported  
398 the country of origin in the heading of the product webpage. Most of the *Yin Xue*  
399 products reported France (63.6%), while the rest claimed origin from other countries.  
400 All the *Hei Xue Yu* products were claimed from Alaska, while the two *Luo Gai Yu*  
401 products claimed France and Chile, respectively. As mentioned, voluntary  
402 information about the capture area could only be found in the heading of the product  
403 webpage of 6 *Yin Xue* products (Antarctic).

404 In the website description several countries of origin were reported for *Yin Xue*  
405 products: also in this case the most part reported France (67%). Twenty-nine (88%)  
406 *Yin Xue* products, all the *Hei Xue Yu* products and both *Luo Gai Yu* products reported  
407 the capture area (Table 2SM)..

408 **3.7.2. Label.** Of the total 42 samples, 34 (81%) reported the country of origin  
409 (Table 2, 1SM and 2SM). The *Yin Xue* products derived from 4 countries: France  
410 (51.5%), Chile (21.2%), New Zealand (3%) and US/Alaska (3%). All the *Hei Xue Yu*

411 products reported US/Alaska, while only 1 *Luo Gai Yu* presented the country origin  
412 (France). Most of the products presented consistent information concerning the  
413 country of origin on the webpage and on the label (Table 2).

414 Only 10 samples (8 *Yin Xue* products and 2 *Hei Xue Yu*) presented some  
415 information about the capture area. Interestingly, of the different capture areas  
416 reported (FAO 58, FAO 67, Kerguelen Islands, North Atlantic, North Pacific, South  
417 Pacific and Arctic Ocean), only FAO 67 and North Pacific (30%) are coherent with  
418 the distribution of *A. fimbria*, which is generally found in Northeastern Pacific from  
419 Baja California, northward to the northern-central Bering Sea, and Northwestern  
420 Pacific from Kamchatka peninsula, southward to northeastern coast of Japan (Stewart,  
421 Thorson & Wetzel, 2011).

### 422 ***3.8. Comparison between geographical origin and molecular results.***

423 *“When a food undergoes processing in a second country which changes its nature,*  
424 *the country in which the processing is performed shall be considered to be the*  
425 *country of origin for the purposes of labeling”*  
426 (<http://www.fao.org/docrep/005/Y2770E/y2770e02.htm>). Every subsequent transit  
427 following the initial export after landing is defined by CCAMLR as a re-export  
428 (Clarke, 2009).

429 On the basis of the available information, we assume that the 5 countries indicated  
430 on the webpage and on the products (France, Chile, New Zealand, Argentina and  
431 USA) have been responsible of the last processing step. It should be noted that for  
432 Toothfish all processing generally happens on board

433 ([https://www.ccamlr.org/fr/system/files/ID%20Guide%20PatToothFish\\_ENG\\_A4.pdf](https://www.ccamlr.org/fr/system/files/ID%20Guide%20PatToothFish_ENG_A4.pdf)  
434 ). Therefore the origin should match in theory with the vessel flag.

435 However, considering that Toothfish products have been recorded undergoing 8  
436 transit before reaching the final destination (Clarke, 2010), it is very difficult to  
437 reconstruct the pathway followed by these products. Moreover, considering both the  
438 inconsistencies among the country of origin and the capture areas and between these  
439 data and the results of the molecular analysis, the truthfulness of all declarations is  
440 doubtful.

441 Overall, a capture area was available for 40 samples, ranging from Antarctic (15),  
442 North Atlantic (10), North Pacific/Alaska (8), France (4), Reunion Island (2), South  
443 Pacific (1) and English Channel (1) (Table 2 and 2SM). Comparing the declared  
444 catch areas and the range of the species molecularly identified, 16 out of 40 (40%)  
445 products presented completely inconsistent declarations. In fact, North Atlantic,  
446 English Channel and Alaska are inconsistent with the area of distribution of  
447 *Dissostichus* spp, suggesting intentional mislabeling (see Section 3.9). Congruent  
448 information was found for 21 products declaring North Pacific, Alaska or FAO area  
449 67 and Antarctic, FAO area 58, France (most likely referred to the French Southern  
450 and Antarctic Lands) and South Pacific consistent with the distribution of *A. fimbria*  
451 and *Dissostichus* spp, respectively (Table 3SM).

### 452 ***3.9 Voluntary or involuntary mislabeling?***

453 The seafood chain is one of the food sectors most affected by fraudulent practices.  
454 Over the last years, an alarming number of mislabeling cases have been reported



455 worldwide (Cawthorn, Duncan, Kastern, Francis, & Hoffman, 2015; Stiles et al.,  
456 2013). Mislabeling is usually committed by substituting high-price market species  
457 with less valuable ones. In some cases, mislabeling can allow the commercialization  
458 of toxic species banned from the market or recycle illegal fish products (Pramod et al.,  
459 2014; Xiong et al., 2016b). Thus, mislabeling is usually considered an intentional  
460 practice. In fact, the differentiation of fish species is often easily practicable by  
461 industry workers who handle these species on a daily basis (Miller, Jessel, & Mariani,  
462 2012). However, in the case of processed products, accidental substitution could  
463 happen due to lack of the main essential morphological characteristics and can be  
464 further fostered by the absence of a detailed system for seafood labeling (Cawthorn et  
465 al., 2015; Xiong et al., 2016a).

466 China does not possess a legal framework for the management of the seafood  
467 traceability comparable to the one implemented by the EU. In particular, the lack of a  
468 specific regulation establishing the mandatory information that must be provided  
469 with the accompanying documents or the labels greatly affects the transparency of the  
470 seafood sector (Xiong et al., 2016a). In this context, the use of generic names can  
471 foster mislabeling. Although prices vary depending on fish preparation, the retail  
472 prices reported for Toothfish by Grilly et al., (2015) (\$65/kg) and those found in this  
473 study for *A. fimbria* sold online are similar. Thus, the mislabeling of Toothfish as *A.*  
474 *fimbria* on the online Chinese market may be due to the fact that Chinese consumers  
475 are more acquainted to Sablefish. In addition, mislabeling would allow to market  
476 IUU products fished without authorization or over the catch quotas (see section 3.10).

477 Moreover, it has to be considered that prices for Sablefish in Chinese supermarkets  
478 can reach 100 euro/kg, thus it could happen that an IUU operator gets more economic  
479 benefit by selling the fish as Sablefish in China than by selling it as Toothfish in other  
480 markets. In these cases, products misdescription would be the result of a voluntary  
481 adulteration of the labels.

482 Interestingly, all the 11 products that reported additional names referring to  
483 *Dissostichus* spp. were molecularly identified as *D. eleginoides* (n=10) and *D.*  
484 *mawsoni* (n=1). In these specific cases, the label incongruities seem to be more likely  
485 due to the chaos affecting fish denominations and misspelling, rather than to a  
486 deliberate fraud. In fact, names referring to Toothfish were never found on the 6  
487 samples identified as *A. fimbria* (Table 2).

488 Considering also the inconsistencies found in the analysis of the geographical  
489 origin, further detailed studies should be performed to exactly understand what  
490 products have been voluntarily commercialized under a false name. In fact, if not  
491 proper countered mislabeling opens door to IUU fishing and vanishes conservation  
492 efforts.

### 493 ***3.10 Potential impacts for conservation of Dissostichus spp.***

494 Patagonian and Antarctic toothfish (*D. eleginoides* and *D. mawsoni*) are  
495 commercially important fish belonging to the Nototheniidae family. The long life  
496 span (up to 50 years) and late sexual maturity (10 years) make them exceptionally  
497 vulnerable to over-exploitation (Pala, 2015; Sovacool & Siman-Sovacool, 2008).

498 The commercial exploitation of Patagonian Toothfish began in the late 1980s

499 (Österblom, Bodin, Sumaila & Press, 2015). In the 1990s, as a consequence of the  
500 depletion of predatory fish stocks in the Northern hemisphere fishing effort moved  
501 southwards and *D. eleginoides* quickly became very popular in the USA and Japan  
502 (Österblom et al., 2015; Sovacool & Siman-Sovacool, 2008). The Antarctic toothfish  
503 fishery began  
504 later([http://www.colto.org/wp-content/uploads//2012/09/Ross\\_Sea\\_FAQ.pdf](http://www.colto.org/wp-content/uploads//2012/09/Ross_Sea_FAQ.pdf)).

505 Most of Toothfish fisheries are managed by the Commission for the Conservation of  
506 Antarctic Marine Living Resources (CCAMLR). CCAMLR came into effect in the  
507 1980's, has 25 member states and is the regional fisheries management organization  
508 for fisheries assessment, management and monitoring and marine conservation in the  
509 Southern Ocean (<https://www.ccamlr.org/en/>).

510 Patagonian toothfish is caught off the coasts of Chile, Argentina, Peru, Uruguay,  
511 Patagonia, and around sub-Antarctic islands and seamounts at depths of 500-1000 m.  
512 Antarctic toothfish is generally caught at higher latitudes in the circumpolar waters  
513 adjacent to Antarctica at depths of 2000 m (Roberts, Xavier & Agnew, 2011). In  
514 addition, Toothfish are caught outside CCAMLR's Convention Area, mostly taken  
515 from domestic fisheries around South America and landed in local ports  
516 ([https://www.ccamlr.org/fr/system/files/ID%20Guide%20PatToothFish\\_ENG\\_A4.pdf](https://www.ccamlr.org/fr/system/files/ID%20Guide%20PatToothFish_ENG_A4.pdf)  
517 ).

518 Both species of *Dissostichus* are highly prized around the world, which is the main  
519 reason why they have caught the attention of IUU fishing vessels  
520 (<https://www.ccamlr.org/en/fisheries/toothfish-fisheries>). In order to combat this issue,

521 in the early 2000s CCAMLR developed a novel Catch Documentation Scheme  
522 whereby all Toothfish unloaded or transported must be accompanied by a *Dissostichus*  
523 catch document (DCD),  
524 (<https://www.ccamlr.org/en/compliance/illegal-unreported-and-unregulated-iuu-fishin>  
525 [g](#)).

526 Other efforts, such as the total allowable catch (TAC) limits, enforcement of  
527 port/control inspection measures and a satellite linked vessel-monitoring system, have  
528 also been made (Sovacool & Siman-Sovacool, 2008)  
529 ([http://www.colto.org/wp-content/uploads//2012/09/Ross\\_Sea\\_FAQ.pdf](http://www.colto.org/wp-content/uploads//2012/09/Ross_Sea_FAQ.pdf)). Although  
530 the implementation of these measures in the framework of international cooperation  
531 claimed to succeeded to decrease IUU fishing substantially (Österblom et al., 2015), it  
532 still remains a concern and has the potential to seriously undermine CCAMLR's  
533 conservation objectives (Lack, 2008;  
534 <https://www.ccamlr.org/en/compliance/illegal-unreported-and-unregulated-iuu-fishin>  
535 [g](#)).

536 IUU fishing operators may find in the Chinese market open doors for laundering  
537 their catches through mislabeling, suggesting the need for additional control and  
538 enforcement measures. Previous surveys have already revealed that mislabeling  
539 nullified the conservation efforts to promote the consumption of sustainably  
540 harvested *D. eleginoides* by social marketing (Marko, Nance & Guynn, 2011; Marko,  
541 Nance & van den Hurk, 2014).

#### 542 **4. Conclusions**

543 China's leading role in the international seafood market, together with the  
544 booming demand for foreign seafood and the improved access by the emerging  
545 online seafood market, strengthen the importance of its role in the global initiatives  
546 for marine conservation (Fabinyi, 2016). In particular, the implementation of an  
547 accurate seafood naming and labeling is of pivotal importance (Helyar et al., 2014,  
548 Xiong et al., 2016a).

549 In this study, the substitution of *A. fimbria* with *Dissostichus* spp. in 86% of the  
550 products provides additional evidences of the possible existence of a collateral flow  
551 that most likely allows the recycling of illegal product on the Chinese market (Xiong  
552 et al., 2016b). This fraudulent conduct may represent a great issue for the  
553 conservation of *Dissostichus* spp.

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559

560 **Fig. 1** Presentation of the received products: single slice (a), multiple slices (b),  
561 head (c).

562 **Fig. 2** Pie charts showing the species identified with the molecular analysis, divided  
563 according to the search term used.

564

565       **References**

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## \*Highlights (for review)

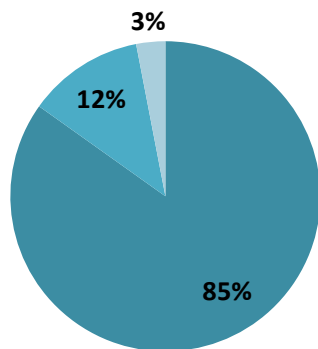
- Products sold online as *Yin Xue* (Chinese pinyin for Sablefish) in China were collected
- DNA barcoding revealed an alarming overall misrepresentation rate of 85.7%
- Sablefish was found to be substituted with Patagonian and Antarctic Toothfish
- Voluntary and involuntary mislabeling have been hypothesized
- Implications for Toothfish conservation have been discussed

Figure

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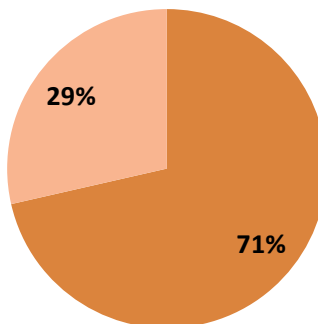


Figure



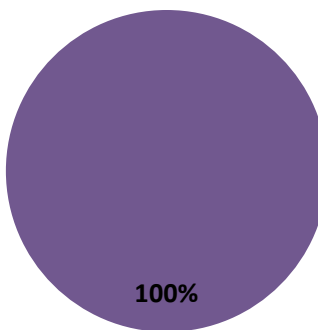
### ***Yin Xue* products**

- *Dissostichus eleginoides*
- *Dissostichus mawsoni*
- *Anoplopoma fimbria*



### ***Hei Xue* products**

- *Anoplopoma fimbria*
- *Dissostichus eleginoides*



### ***Luo Gai Yu* products**

- *Dissostichus eleginoides*

**Table 1** Chinese names for *Anoplopoma fimbria*

Scientific name	Chinese name	Chinese Pin Yin	References
<i>Anoplopoma fimbria</i>	银鳕	<i>Yin Xue</i>	Latin-Chinese Dictionary of Fish Names; Centre for Food Safety of Hong Kong (2007); Wikipedia
	裸盖鱼	<i>Luo Gai Yu</i>	Latin-Chinese Dictionary of Fish Names; Centre for Food Safety of Hong Kong (2007); Wikipedia; Fishbase
	裸头鱼	<i>Luo Tou Yu</i>	Wikipedia; Fishbase
	黑鳕鱼	<i>Hei Xue Yu</i>	Online rumors <sup>a</sup>

<sup>a</sup>[http://blog.sina.com.cn/s/blog\\_546be44c0101ghm7.html](http://blog.sina.com.cn/s/blog_546be44c0101ghm7.html) Accessed 21.07.2015

**Table 2** Information on the sampled products and molecular results. Coherent species denominations, when comparing denominations found on the heading of the product webpage, in the product description in the product webpage and on the label of the received products, were observed only for 17 samples (40.5%, in grey in Table 2). NR: Not Reported

Selected products	General information				Heading of the product webpage			Product description in the product webpage				Label of the received products				Molecular results		
	Code of online vendor	Code of sample	Monthly transaction volume (Pieces)	Price (Euro/kg)	Species denomination	Geographical origin		Species denomination	Geographical origin		Product status	Species denomination		Geographical origin		Sequence length (bp)	BLAST NCBI	BOLD IDsystem
						Country of origin	Capture area		Country of origin	Capture area		Species denomination in the product name	Species denomination in the ingredient list	Country of origin	Capture area			
F1	ON1		2033	44.06	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i> and <i>Luo Gai Yu</i>	France	North Atlantic Ocean	In bulk	<i>Yin Xue</i>	NR	France	NR	622	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 100%-98.92%
	ON2		42	45.88	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i> and <i>Luo Gai Yu</i>	France	North Atlantic Ocean	In bulk	<i>Yin Xue</i>	NR	France	NR	624	<i>D.eleginoides</i> 99%	<i>D.eleginoides</i> 99.83%-98.72%
F2	ON3		1351	43.38	<i>Yin Xue</i>	Chile	NR	<i>Yin Xue</i> and silver cod	Chile	Ross Sea (Antarctic Ocean)	Prepackaged	<i>Yin Xue</i> , Patagonia toothfish and <i>D.eleginoides</i>	<i>Yin Xue</i>	Chile	NR	610	<i>D.eleginoides</i> 99%	<i>D.eleginoides</i> 98.72%-99.65%
F3	ON4		768	42.94	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i>	France	Grown in North Pacific Captured in Réunion Island	In bulk	<i>Yin Xue</i>	NR	France	NR	642	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.78%-100%
	ON5		54	50.00	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i>	France	Grown in North Pacific Captured in Réunion Island	In bulk	<i>Yin Xue</i>	NR	France	NR	620	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.92%-100%
Yin Xue products	ON6		1244	61.28	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i> and Patagonian toothfish	France	deep sea of France	Prepackaged	<i>Yin Xue</i> , Patagonia toothfish and <i>D.eleginoides</i>	NR	France	FAO 58	318	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 99-100%
	ON7		76	28.43	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i> , <i>Luo Gai Yu</i> , <i>Luo Tou Yu</i> , <i>Hei Xue Yu</i> and <i>A. fimbria</i>	France	deep sea of France	Prepackaged	<i>Yin Xue</i>	<i>Yin Xue</i>	France	NR	648	<i>D.eleginoides</i> 99-100%	<i>D. eleginoides</i> 98.79-100%
F5	ON8		236	29.04	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i> and cod fish; <i>Yin Xue</i> belonging to <i>Bei Da Xi Yang Yu Ke</i> ;	France	North Atlantic Ocean	Prepackaged	<i>Yin Xue</i> and toothfish	<i>Yin Xue</i> and toothfish	NR	NR	619	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 99.09%-100%
	ON9		25	12.65	<i>Yin Xue</i> and <i>Xue Yu</i>	Chile	NR	<i>Yin Xue</i>	Chile	Antarctic deep sea	Prepackaged	<i>Yin Xue</i>	<i>Yin Xue</i>	Chile	NR	648	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.96%-100%
	ON10		30	47.00	<i>Yin Xue</i> and <i>Xue Yu</i>	Chile	Antarctic	<i>Yin Xue</i>	Chile	Antarctic deep sea	Prepackaged	<i>Yin Xue</i> and toothfish	<i>Yin Xue</i> and toothfish	Chile	NR	646	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.78%-100%
F6	ON11		371	40.44	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i> , <i>Luo Gai Yu</i> , <i>Luo Tou Yu</i> , <i>Hei Xue Yu</i> and <i>A. fimbria</i>	France	NR	In bulk	<i>Yin Xue</i>	NR	France	NR	612	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.89%-100%
F7	ON12		346	44.04	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i> and <i>D.eleginoides</i>	France	FAO 58	In bulk	<i>Yin Xue</i>	NR	France	Kerguelen Islands	618	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 99.09%-100%
	ON13		12	11.03	<i>Yin Xue</i> and <i>Xue Yu</i>	New Zealand	NR	<i>Yin Xue</i> and cod	New Zealand	North Atlantic Ocean	In bulk	<i>Yin Xue</i>	NR	New Zealand	NR	616	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.94%-100%

F8	ON14	232	46.32	<i>Yin Xue</i>	NR	Antarctic	<i>Yin Xue</i> , silver cod, sablefish and <i>A. fimbria</i>	Chile and France	Grown and captured in North Atlantic Ocean; Captured in Antarctic	In bulk	<i>Yin Xue</i>	NR	Chile	NR	649	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.95%-100%
	ON15	28	24.01	<i>Yin Xue</i>	NR	Antarctic	<i>Yin Xue</i>	France	NR	In bulk	<i>Yin Xue</i>	NR	Chile	NR	647	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.78%-100%
F9	ON16	221	39.56	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i> and silver cod	France	North Atlantic Ocean	In bulk	<i>Yin Xue</i>	NR	France	NR	547	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.89%-100%
F10	ON17	119	40.59	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i>	France	North Atlantic Ocean	In bulk	<i>Yin Xue</i>	NR	France	NR	654	<i>D.mawsoni</i> 99-100%	<i>D.mawsoni</i> 99.84%-100%
F11	ON18	116	78.82	<i>Yin Xue</i> and <i>Xiao Lin Nan Ji Quan Ya Yu</i>	Argentina	Antarctic	<i>Yin Xue</i> and <i>Xiao Lin Nan Ji Quan Ya Yu</i>	Argentina	Antarctic Ocean	Prepackaged	<i>Yin Xue</i> , Patagonia toothfish and <i>Xiao Lin Nan Ji Quan Ya Yu</i>	<i>Xiao Lin Nan Ji Quan Ya Yu</i>	NR	NR	647	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.94%-100%
F12	ON19	67	43.82	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i> and silver cod	France	Antarctic Ocean	In bulk	<i>Yin Xue</i>	NR	France	NR	648	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.94%-100%
	ON20	5	48.04	<i>Yin Xue</i>	Chile	NR	<i>Yin Xue</i>	Chile	Antarctic Ocean	In bulk	<i>Yin Xue</i>	NR	Chile	NR	650	<i>D.mawsoni</i> 99%-100%	<i>D.mawsoni</i> 99.84%-100%
	ON29	5	48.19	<i>Yin Xue</i>	Chile	NR	<i>Yin Xue</i>	Chile	Antarctic Ocean	In bulk	<i>Yin Xue</i>	NR	Chile	NR	635	<i>D.mawsoni</i> 99%-100%	<i>D.mawsoni</i> 99.83%-100%
F13	ON21	84	57.35	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i>	France	Captured in deep sea of France	In bulk	<i>Yin Xue</i>	NR	France	NR	650	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.96%-100%
F14	ON22	67	42.06	<i>Yin Xue</i>	France	Antarctic	<i>Yin Xue</i>	France	Captured in Antarctic	In bulk	<i>Yin Xue</i> and <i>Luo Gai Yu</i>	NR	France	North Atlantic Ocean	640	<i>D.eleginoides</i> 99%	<i>D.eleginoides</i> 98.6%-99.84%
F15	ON23	64	47.12	<i>Yin Xue</i> and <i>Xue Yu</i>	NR	NR	<i>Yin Xue</i>	Chile	Captured in South Pacific Ocean	Prepackaged	<i>Yin Xue</i> and Chilean seabass	<i>Yin Xue</i> and Chilean seabass	NR	South Pacific Ocean	652	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 99.12%-100%
F16	ON24	53	40.59	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i> and Patagonian toothfish	France	North Atlantic Ocean;	In bulk	<i>Yin Xue</i> and silver cod	NR	France	FAO 58	609	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 99.09%-100%
F17	ON25	35	40.59	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i> and cod	France	North Atlantic Ocean; <i>Yin Xue</i> is always produced in Antarctic; Our <i>Yin Xue</i> is captured in Reunion Island	In bulk	<i>Yin Xue</i>	NR	France	NR	653	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.78%-100%
F18	ON26	24	38.43	<i>Yin Xue</i> and <i>Xue Yu</i>	USA	NR	<i>Yin Xue</i> and <i>Hei Xue Yu</i>	USA	Alaska	Prepackaged	<i>Yin Xue</i> , <i>Luo Gai Yu</i> and <i>A.fimbria</i>	<i>Yin Xue</i> and <i>Luo Gai Yu</i>	USA	FAO 67	651	<b><i>A.fimbria</i> 99%-100%</b>	<b><i>A.fimbria</i> 98.85%-100%</b>
F19	ON27	22	45.88	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i> and seabass	France	NR	Prepackaged	<i>Yin Xue</i>	<i>Yin Xue</i>	NR	Arctic Ocean	645	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.78%-100%
	ON31	22	45.88	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i> and seabass	France	NR	Prepackaged	<i>Yin Xue</i>	<i>Yin Xue</i>	NR	Arctic Ocean	610	<i>D. mawsoni</i> 99-100%	<i>D. mawsoni</i> 99.83%-100%
F20	ON28	28	39.96	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i>	France	Antarctic Ocean	In bulk	<i>Yin Xue</i>	NR	NR	NR	645	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 99.09%-100%
F21	ON32	13	35.29	<i>Yin Xue</i> and <i>Xue Yu</i>	France	NR	<i>Yin Xue</i>	France	NR	In bulk	<i>Yin Xue</i>	NR	France	NR	652	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 99.12%-100%
F22	ON33	1	61.28	<i>Yin Xue</i>	Chile	Antarctic	<i>Yin Xue</i>	Chile	Antarctic Ocean	In bulk	<i>Yin Xue</i>	NR	France	NR	653	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.8%-100%
F23	ON34	28	50.00	<i>Yin Xue</i>	France	NR	<i>Yin Xue</i>	France	deep sea of France	In bulk	<i>Yin Xue</i>	NR	France	NR	648	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.96%-100%



	F5	ON35	10	51.76	<i>Hei Xue Yu and Xue Yu</i>	Alaska	NR	<i>Hei Xue Yu</i>	USA	Alaska	Prepackaged	<i>Hei Xue Yu and black cod</i>	<i>Hei Xue Yu</i>	USA	NR	653	<b><i>A.fimbria</i></b> 99%	<b><i>A.fimbria</i></b> 98.7%-99.84%
	F4	ON36	118	48.47	<i>Hei Xue Yu and Xue Yu</i>	Alaska	NR	<i>Hei Xue Yu</i>	Alaska	Alaska	Prepackaged	<i>Hei Xue Yu and Luo Gai Yu</i>	NR	USA	NR	649	<b><i>A.fimbria</i></b> 99%-100%	<b><i>A.fimbria</i></b> 98.8%-100%
	F15	ON37	45	59.49	<i>Hei Xue Yu and Xue Yu</i>	Alaska	NR	<i>Hei Xue Yu</i>	Alaska	North Pacific	Prepackaged	<i>Hei Xue Yu and black cod</i>	<i>Hei Xue Yu and black cod</i>	NR	North Pacific Ocean	655	<b><i>A.fimbria</i></b> 99%-100%	<b><i>A.fimbria</i></b> 98.86%-100%
<i>Hei Xue Yu</i> products	F8	ON38	18	38.76	<i>Hei Xue Yu and Xue Yu</i>	Alaska	NR	<i>Hei Xue Yu and Luo Gai Yu</i>	Alaska	Alaska	In bulk	<i>Hei Xue Yu</i>	NR	USA	NR	653	<b><i>A.fimbria</i></b> 99%-100%	<b><i>A.fimbria</i></b> 98.86%-100%
	F24	ON39	1	48.53	<i>Hei Xue Yu and Xue Yu</i>	Alaska	NR	<i>Hei Xue Yu</i>	USA	Alaska	Prepackaged	<i>Hei Xue Yu and black cod</i>	<i>Hei Xue Yu and black cod</i>	USA	NR	647	<b><i>A.fimbria</i></b> 99%-100%	<b><i>A.fimbria</i></b> 98.82%-100%
	F12	ON40	10	40.59	<i>Hei Xue Yu and Xue Yu</i>	Alaska	NR	<i>Hei Xue Yu and Luo Gai Yu</i>	Alaska	Alaska	In bulk	<i>Hei Xue Yu</i>	NR	Alaska	NR	625	<i>D.eleginoides</i> 99%-100%	<i>D.eleginoides</i> 98.94%-100%
	F18	ON41	4	42.21	<i>Hei Xue Yu and Yin Xue</i>	Alaska	NR	<i>Hei Xue Yu and Yin Xue</i>	USA	Alaska	Prepackaged	Black cod, <i>Yin Xue</i> , <i>Luo Gai Yu</i> and <i>A.fimbria</i>	<i>Yin Xue</i> and <i>Luo Gai Yu</i>	USA	FAO 67	560	<i>D.eleginoides</i> 99%	<i>D.eleginoides</i> 98.51%-99.64%
	F25	ON30	42	36.69	<i>Yin Xue</i> and <i>Luo Gai Yu</i>	Chile	NR	<i>Yin Xue</i>	France	North Atlantic Ocean	In bulk	<i>Yin Xue</i>	NR	France	NR	650	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.79%-100%
<i>Luo Gai Yu</i> products	F26	ON42	0	58.18	<i>Yin Xue</i> , <i>Xue Yu</i> and <i>Luo Gai Yu</i>	France	NR	<i>Yin Xue</i>	France	English Channel	In bulk	NR	NR	NR	NR	646	<i>D.eleginoides</i> 99-100%	<i>D.eleginoides</i> 98.78%-100%

The products highlighted in grey are those reporting congruent denominations in the product page (heading and description) and on the label. The BLAST NCBI and BOLD ID system results in bold are those showing identity with *Anoplopoma fimbria*: only for these 6 products the species declared on the webpage and on the label corresponded to the species molecularly identified.

<sup>a</sup>*Bei Da Xi Yang Yu Ke* does not exist.

**Table 3** Common names of *Anoplopoma fimbria*, *Dissostichus eleginoides* and *Dissostichus mawsoni* in different countries and international lists

Species	FAO ASFIS list <sup>a</sup>		USA <sup>b</sup>		Canada <sup>c</sup>	UK <sup>d</sup>	France <sup>e</sup>	Spain <sup>f</sup>	Italy <sup>g</sup>	Australia <sup>h</sup>		China <sup>i</sup>
	English name	Accepted market name	Common name	Vernacular name	Accepted market name	Accepted market name	Accepted market name	Accepted market name	Accepted market name	Accepted market name	Obsolete name	Accepted market name
<i>Anoplopoma fimbria</i>	Sablefish	Sablefish	Sablefish	Black cod, Butterfish, Skil, Skilfish, Beshow, Coalfish	Sablefish, Black cod	Sablefish	NR	Bacalao negro de Alaska	Carbonaro dell'Alaska	NR	NR	裸盖鱼 ( <i>Luo Gai Yu</i> ) 银鳕 ( <i>Yin Xue</i> ) 黑鳕鱼 ( <i>Hei Xue Yu</i> ) 裸头鱼 ( <i>Luo Tou Yu</i> )
<i>Dissostichus eleginoides</i>	Antarctic toothfish	Chilean seabass/toothfish	Patagonia toothfish	Antarctic cod, Icefish, Mero, Sea bass, Snapper	Patagonian toothfish	Icefish, Toothfish	Légine antarctique, Ccolin antarctique	Robalo de fondo, Robalos de profundidad	Moro antartico	Patagonian toothfish	Australian sea bass, Sea bass, Toothfish	小鳞犬牙南极鱼 ( <i>Xiao Lin Quan Ya Nan Ji Yu</i> )
<i>Dissostichus mawsoni</i>			Antarctic toothfish	NR	Antarctic toothfish		NR	Robalos de profundidad	NR	NR	NR	鳞头犬牙南极鱼 ( <i>Lin Tou Quan Ya Nan Ji Yu</i> )

<sup>a</sup>FAO Fisheries and Aquaculture Statistics and Information Service. ASFIS List of Species for Fishery Statistics Purposes. Fishery Fact Sheets Collections, 2015 <http://www.fao.org/fishery/collection/asfis/en>; <sup>b</sup><http://www.accessdata.fda.gov/scripts/fdcc/?set=seafoodlist>;  
<sup>c</sup><http://www.inspection.gc.ca/active/scripts/fssa/fispoi/fplist/fplist.asp?lang=e>;

<sup>d</sup><https://www.gov.uk/government/publications/commercial-designations-of-fish-united-kingdom>;

<sup>e</sup><http://www.economie.gouv.fr/dgccrf/Consommation/Etiquetage-des-produits/Produits-de-la-mer-et-d-eau-douce/Listes-des-denominations-commerciales>; <sup>f</sup>Resolución de 22 Marzo 2011 de la Secretaría General del Mar; <sup>g</sup>Ministerial Decree of the Italian Minister of Agriculture, Food and Forestry (MIPAAF) of 27<sup>th</sup> March 2002 and subsequent integrations; <sup>h</sup><http://www.fishnames.com.au/>; <sup>i</sup>The references for the Chinese names of *A. fimbria* are listed in Table 1; The references for *D. eleginoides* and *D. mawsoni* are the Latin-Chinese Dictionary of Fish Names (2016) and the Centre for Food Safety of Hong Kong (2007).

e-component

[Click here to download e-component: Table 1SM.doc](#)

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e-component

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**Reviewer #1:** It is an interesting work that identified the valuable fish species from e-commerce platforms. Indeed, China lacks the standardized seafood nomenclature and measures for seafood traceability. Chaotic labeling and mislabeling of seafood is a problem to food safety and species conservation.

There are some revisions suggesting:

Page 3, line 64: changes "reef fish" to "fish maw", abalone, shark fin, sea cucumber and fish maw are in the list of the four treasures from the sea in Chinese cuisine.

**This change has been done**

Page 8, lines 171-172: exchange "B2C" with "Business to Customer (B2C)".

**Business to Customer (B2C) has now been inserted the first time the term appears (line 169).**

Table 2 and Page 18, lines 400-402: "Consistent species denominations are in grey." is confused, which are consistent species denominations? Yin Xue?

**With consistent species denominations we meant that the species denominations found on the heading of the product webpage, in the product description in the product webpage and on the label of the received products were coherent. This means that they were always referable to *A. fimbria*. For example, when denominations such as Yin Xue (used for *A. fimbria*) and toothfish were found on the same product, they were considered inconsistent. The heading of Table 2 and the text (line 399) have been amended hoping that the meaning is clearer now.**

What is NR, maybe "no record"?

**NR means Not Reported. It has been now reported in the caption of the table.**

Page 8, line 187: 100 ng/ml or 100 ng/<mu>?</mu>

**It was a mistake. The correct concentration is 100 ng/μl. The text has been amended.**

Page 13, line 301: Why the lengths of FDB sequences of same species *D.eleginoides* were significantly different (318, 547and 648 bp in Table 2)?

**On the basis of our experience we can state that it is normal to obtain sequences of different length even using the same primers for the amplification of the DNA. In fact, the length of the sequences depends on the quality of the raw data obtained from the sequencing service. Anyhow, the average length of the sequences obtained in this work was ~628bp that corresponds to 95% of the expected length (655bp).**

Page 14, line 309 and Page 19, line 412: Where is Fig. 1?

**It was a mistake. Fig 1 has been now uploaded on the system but it is now named Fig. 2 since we have also produced another figure (Fig. 1) illustrating the kind of products analyzed in the study.**

Page 15, lines 415-416: "Qing et al., 2014" is the research on puffer fish identification, not cod. You can compare with "Xiong et al., 2016".

**In the work of Qing et al. 2014 7 products sold as cod were in fact *Lagocephalus*.**

Table 3: Illustrate "ASFIS".

**ASFIS has been explained.**

**Reviewer #2:** Xiong et al conducted a molecular identification of seafood from Chinese on-line market. They have analysed 42 seafood products and found 85.7% of mislabeling. The manuscript results are very interesting, but their results and discussion is too long making it hard to read and understand. I suggest the

authors to simplify the results and discussion section focusing on their results and not in consumer's preferences and on-line platforms. See below more detailed suggestions:

Line 71-74 - This sentence needs a citation.

**The citation related to this sentence is Sonu, 2014, which is cited after the following sentence.**

Results and discussion

279-283 - Where is your correlation data? Moreover, you are discussing consumers on-line preferences? I believe you should discuss results of your molecular data, and not Chinese on-line consumers preferences.

**We agree that the term correlation could have been misleading and we removed the part.**

Line 289-296 - I don't think you need to show in the results and discussion details of DNA extraction and amplification. If you got the COI barcodes from all samples, it means you extracted and amplified well all your samples.

**Considering that we did not encounter any problem and all the DNA samples have been extracted and amplified without problems, this section has been structured reporting only the essential data. In fact, it only takes 7 lines. This section has been shortened but, in our opinion, it must be reported in the manuscript.**

Line 316-317 - B2C is a delivery service, which is not a webstore. So their responsibility is to deliver, but not to guarantee the quality of products they sell. Could you make this clear? I believe the brand or industry producing or processing the seafood product are responsible for the seafood quality and certification.

**This is a complex and still debated issue. According to the amended Food Safety Law of China (2015):**

***“Third-party platform providers for online food trade shall implement real-name registration of admitted food distributors, specify their food safety management responsibilities and, if they have lawfully obtained licensing, inspect their licenses”***

***“Upon finding any activity in breach of this Law, they shall immediately stop the activity and report to the food and drug administration of the competent people's government at the county level; in case of a serious breach, they shall immediately stop providing online trading platform services”***

***“Any consumer whose lawful rights and interests are damaged due to purchase of food via any third-party platform of online food trading may claim indemnification against the distributor or producer of such admitted food”***

In fact it appears a shared responsibilities and platforms can manage this aspect establishing internal rules. See for example: <https://compliancecloud.selerant.com/latestnews/food-e-commerce2.aspx?ComplID=&q=>

However, according to your suggestion and considering that the topic is complicated and under discussion, we decided not to add any new part regarding this aspect.

Line 344-349 - You are discussing data not related to your work here. This makes your discussion too long.

**The discussion between lines 344-349 has been deleted.**