

1 **Next Generation Sequencing (NGS) approach applied to species identification in mixed fishery**
2 **products**

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23 **Abstract**

24 Multi-species fish products are a growing market segment driven by several inputs, including
25 urbanization, modern lifestyles and the availability of new technologies. These products are
26 characterized by the absence of species-related morphological traits, as well as by the use of discards or
27 fish waste as ingredients, that cannot be traced using a classical molecular approach. This historic
28 inability to identify ingredients, coupled with a rather lean list of mandatory information required by
29 current legislation, make these products the perfect target for substitution fraud. New molecular tools
30 are now available to overcome this gap, such as the metabarcoding approach which can be used to trace
31 species from complex food matrices. In this study, we used such an approach to sequence a fragment of
32 16S rRNA mitochondrial gene (~200bp) from 20 multispecies processed seafood products, sold on the
33 Italian market and including breaded, burger and surimi, in order to evaluate mislabeling rates and
34 formulate hypotheses regarding the potential drivers of fraudulent activities. Our results highlighted the
35 presence of 120 marine taxa with an overall mislabeling rate of 45%, including some low-abundance
36 taxa not included in the current Italian legislation, found mainly in the surimi samples. The presence of
37 Tetraodontidae and swine DNA raise concerns regarding consumer safety and protection with regard to
38 ethical or religious issues. The high number of low-frequency taxa confirms the inclusion of discards
39 and fish waste, doubtless positive for sustainable fisheries, but also boosting profits for the fish
40 industry. Such practice, however, without an adequate labelling and traceability system, is a source of
41 risk for consumers and marine ecosystems. In this context, a revision of national and international food
42 safety legislation is needed; indeed, metabarcoding assessments can provide useful information to
43 stakeholders and act as the future operational tool for inspective monitoring.

44

45 *Keywords:* seafood fraud, DNA-based methods, NGS, multispecies fish products, food metabarcoding

46 **1. Introduction**

47 During the last two decades, massive changes have occurred in food habits, in terms of quantity
48 and quality, driven by several inputs such as urbanization, modern lifestyles and the availability of new
49 technologies, shifting consumer preferences toward ready-to-eat or ready-to-cook products (Giusti et
50 al., 2017a; Mottola et al., 2020). Indeed, processed seafood market growth is expected because fish and
51 seafood are relatively cheap and nutritious (high-protein coupled with low fat and calories).

52 Fish-based ready-to-eat/cook foods cover a wide range of product types featuring different
53 species, food-processing methodologies and final packaging. One of the most popular and cheaper
54 types is surimi (Okazaki & Kimura, 2014), but **burgers** and **breaded** fish products are increasing in
55 terms of production and quality thanks to technological improvements, such as the mechanical
56 separation of meat (MSM), which makes it possible to include fish waste without altering the
57 nutritional value of whole fish (Borgogno et al. 2017). After fillets, fish burgers are regarded as the
58 healthiest products, perceived by consumers as a good way of getting children and elderly people to eat
59 fish (Paci et al. 2018). By contrast, **breaded** products, which are made of many ingredients and
60 generally pre-fried, are perceived by consumers as being artificial and unhealthy. However, children
61 and adolescents often dislike fresh fish products, driving families toward breaded or other processed
62 complex products, as they contain no fish bones and have a less fishy flavour (Husein, 2019).

63 Food labelling is the most important instrument for informing consumers and providing
64 essential guarantees of safe fish (Di Pinto et al., 2015, 2016). Labels not only safeguard consumer
65 safety, but also help people to differentiate and choose products based on food attributes or such ethical
66 issues as sustainable production, animal health and wellness, health problems or religious laws.
67 However, substitutions of species, whether by accidental or deliberate fraud, are frequent, and seafood
68 ranks among the most commonly counterfeited foodstuffs (Di Pinto et al., 2015, 2016; Marchetti et al.,
69 2020). Fish substitutions are largely driven by a desire for economic gain (with high-priced species

70 being substituted by cheaper ones), but recently, meta-analyses on mislabelling have highlighted the
71 complexity of the seafood market and multiple context-dependent causes (Donlan et al. 2019).
72 Therefore, a robust labelling and control system is even more important in mixed products that may
73 simultaneously include different fish or mollusc species and, due to the use of several food-processing
74 methodologies, always generate products lacking morphological traits related to the species used as
75 ingredients. Giusti et al. (2017b) generated a table of 89 fish and cephalopod species reported in
76 literature as ingredients used in surimi-based products, whereas no such specific information is
77 available for **burger** and **breaded** products. Moreover, all these product categories are well known to
78 include by-product, underutilized, less valuable, non-directly marketable fish species, but also fish
79 waste indicated as a source of sustainable and nutritious food (Palmeira et al., 2016).

80 In most studies, seafood authentication involves DNA methodologies (Luque & Donlan, 2019);
81 indeed, DNA-barcoding is regarded as the most important policy instrument for species identification
82 (Clark, 2015). However, in the presence of a food matrix containing multiple species, Sanger
83 sequencing produces no useful output, showing only the dominant component and failing to identify
84 the other species present (Paracchini et al. 2019). Even though PCR cloning has previously been used
85 for species identification in mixed products (Galal-Khallaf et al. 2016; Silva, 2019), **the High**
86 **throughput sequencing (HTS), also known as Next Generation Sequencing (NGS),** ~~the high-throughput~~
87 ~~sequencing (HTS) metabarcoding approach~~ is the most promising tool for routine analysis of mixed-
88 species food inspection without requiring any previous knowledge about the species (Haynes et al.
89 2019; Noh et al., 2021). A metabarcoding approach based on 16S rRNA gene amplification has been
90 applied to analyse the microbial communities associated with fish and fish products (Sørensen et al.
91 2020; Sun et al. 2020; Zhang et al. 2019; Zhuang et al. 2019). Moreover, several studies have tested the
92 metabarcoding approach in different food products, including meat (Cottenet et al. 2020; Xing et al.
93 2019), dairy products (Ribani et al. 2018), commercial plant products (Bruno et al. 2019), herbal

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94 medicinal (Anthoons et al. 2021), honey (Wirta et al. 2021) and pet food (Palumbo et al. 2020). Few
95 studies have explored the application of NGS on processed seafood but they have shown that
96 metabarcoding has detected species from commercial or artificially-prepared mixtures, even revealing
97 the presence of non-target species (Carvalho et al. 2017; Franco et al., 2021; Giusti et al. 2017b; Ho et
98 al. 2020; Kappel et al. 2017; Noh et al. 2021; Voorhuijzen-Harink et al. 2019).

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99 Therefore, it is now possible to track ingredients even in the case of multispecies products that
100 were not traceable in the past, providing new elements to understand the complex relationships among
101 different components in the food sector. To this aim, the taxonomic profiles generated in this study
102 using the metabarcoding approach in a wide range of multispecies processed seafood products were
103 analysed to evaluate mislabelling rates and provide a hypothesis of the nature of the potential drivers of
104 fraudulent activities, as well implications and consequences for consumers and impacts on fisheries
105 activities and marine ecosystems.

106

107 **2. Materials and methods**

108 *2.1 Sample collection*

109 A total of 20 processed seafood product samples were collected including three different types:
110 i) ten samples of highly processed surimi-based products (eight frozen, one in brine and one in
111 modified atmosphere packaging); ii) five samples (all frozen) of breaded products (two sticks, two
112 cutlets, and one nugget); iii) five samples of burger (two frozen and three in modified atmosphere
113 packaging). They were purchased from different markets in south-eastern Italy (Apulia region), but the
114 labels indicated different production sites (Table 1 and Full description in Supplementary Table 7). All
115 samples were stored at -20 °C until DNA extraction.

116 *2.2 DNA extraction and sequencing*

117 Genomic DNA was extracted and purified starting from 25 mg aliquots of sample, using the
118 DNeasy Blood and Tissue Kit (QIAGEN, Hilden, Germany) as reported by Marchetti et al. (2020).
119 Negative extraction control (no added tissue) was included to verify the purity of the extraction
120 reagents. The concentration and purity of DNA were established by evaluating the A260 nm/A280 nm
121 ratio using a BioPhotometer D30 filter (Eppendorf, Milan, Italy). The DNA samples were amplified
122 with the primer pairs 16sf-var 5'-CAAATTACGCTGTTAT CCCTATGG-3' and 16sr-var 5'-
123 GACGAGAAGACCCTAATGAGCTTT-3' designed by Chapela et al. (2002), targeting a fragment of
124 ~200bp of the 16S ribosomal RNA mitochondrial gene. The region was then sequenced (2 x 150 bp
125 sequencing) on the Illumina NextSeq platform by LGC Genomics GmbH (Berlin, Germany). Raw
126 sequences were deposited in the Sequence Read Archive (SRA) under the BioProject XX.

127 2.3 Data processing and taxonomic assignment

128 Paired-end reads were processed using Mothur v. 1.45.2 (Schloss et al., 2009). Contigs between
129 read pairs were assembled and differences in base calls in the overlapping region were solved using ΔQ
130 parameter as described in Kozich et al. (2013). Primer sequences were removed (pdiffs = 3), and no
131 ambiguous bases were allowed; the maximum homopolymer size was 8 bp and reads shorter than 80 bp
132 were removed. The remaining reads were dereplicated (unique haplotypes or OTU at 100%) and
133 screened for chimeras using UCHIME in *de novo* mode (Edgar et al., 2011). OTUs with total
134 abundance ≤ 50 reads were removed and taxonomic assignment of the remained dataset was performed
135 using standalone blast in the blast+ suite (Altschul et al., 1990; Camacho et al., 2009) against the 16S
136 mitochondrial custom database (16S_DB), discarding the assignments with a similarity of $< 90\%$.
137 Reads assigned to the same species in the range 100-98% similarity were merged and considered at
138 species level, and values lower than 98% as genus. In the case of ambiguous assignments (shared
139 sequence among species) the Lowest Common Ancestor (LCA) approach was applied.

140 The 16S_DB used for assignments was generated by downloading from GenBank (March 2021) 16S
141 reference sequences belonging to all the Eukaryota taxa and then merged with the latest version (July
142 2020) of the Ribosomal Database Project containing Bacterial 16S references sequences (Cole et al.
143 2014). The database (fasta file and corresponding taxonomy) is available on request.

144 *2.4 Data analyses*

145 The R package “rfishbase” was used to interface with the FishBase database
146 (www.fishbase.org) in order to access the available information on over 33,000 fish species related to
147 their taxonomy, morphology, biology, ecology, life history traits and so on. We checked synonyms,
148 extracted taxonomy and, in the cases of assignments at species level, we extracted and associated all
149 the information available including conservation status of species, environmental information as well
150 as information about method of fishery, the economic importance of the species and its vulnerability to
151 fishery (https://www.fishbase.de/manual/english/fishbasethe_species_table.htm). Among this
152 information, four categories were used to assess ecological and economic aspects related to the
153 different samples and products: habitat (adapted from Holthus and Maragos, 1995), importance, price
154 category (Sumaila et al. 2007) and vulnerability (Cheung et al. 2005). In order to highlight the
155 ecological habitus of different taxa identified in different samples, they were classified as pelagic,
156 benthopelagic or demersal. Pelagic encompasses all the taxa occurring mainly in the water column, not
157 feeding on benthic organisms and categorized in FishBase as pelagic-neritic, pelagic-oceanic and
158 bathypelagic. Benthopelagic encompasses all taxa living and feeding on or near the bottom, as well as
159 in the water column, whereas demersal includes all taxa living and/or feeding on or near the bottom.
160 This latter category encompasses species categorized in FishBase as bathydemersal, demersal and
161 benthic. For all species categorized in FishBase as reef-associated, a specific check on the species’
162 habits was carried out in order to classify the species into one of the other categories. Finally, where it
163 was not possible to associate any category, not determined (NA) was assigned.

164 Concerning the importance of the taxa identified, these are classified as highly commercial,
165 medium commercial, minor commercial, no commercial interest, according to the commercial
166 importance and use of the species in fisheries. In all the cases where it was not possible to associate any
167 category, not determined was assigned. According to price category based on the ex-vessel fish price
168 database (Sumaila et al. 2007), taxa were associated to the following categories: very high, high,
169 medium, low and not determined. Finally, all the taxa recorded in different products were classified as
170 high-very high, high, moderate-high-moderate, low-moderate and low class, according to a
171 vulnerability-to-fishery score (Cheung et al. 2005). When it was not possible to obtain a score, the
172 taxon was classified as not determined (NA). In the case of ambiguous taxonomic assignments, a mean
173 vulnerability score was calculated.

174 Alpha diversity of the mixtures of samples was explored using several descriptors generated
175 using the diverse R package (Guevara et al., 2016): i) richness (R) number of observed taxa in sample;
176 ii) Berger-Parker dominance index (BP dominance) i.e. the proportion of the most abundant taxa
177 compared with the total abundance of taxa in the sample; values for this index range from 0 to 1, in
178 which 0 means no dominance and 1 means total dominance; iii) Pielou evenness index (E) measures if
179 the taxa in the sample had similar proportions; values range from 0-1: samples scoring 1 have equal
180 proportions of species in the sample – samples scoring 0 have very unequal proportions of taxa). For
181 multivariate analysis, Non-metric multiDimensional Scaling (NMDS) based on the Bray-Curtis
182 dissimilarity matrix was generated using the R package vegan version 2.5-5 (Oksanen et al., 2019).
183 Plots were generated using R package ggplot2 (Wickham et al., 2016).

184 *2.5 Mislabelling assessment*

185 Information reported in labels was evaluated based on the current Regulation (EC) No.
186 1169/2011. Molecular identifications of each sample were compared with the corresponding

187 ingredients according to the label, and non-compliance was evaluated by applying the following
188 criteria: 1) labels did not report the precise term 'fish' among the ingredients; 2) the voluntarily
189 declared species did not correspond to that detected by the molecular analysis; 3) detection of molluscs
190 not declared on the label.

191 Molecular identifications were also crossed with the Decree of the Italian Ministry of Agricultural,
192 Food and Forestry Policies (MiPAAF) dated 22th September 2017, in order to evaluate the presence of
193 taxa not included in the list.

194

195 **3. Results**

196 The Illumina sequencing of the 20 samples generated a total of 4,785,851 raw reads and filtering
197 reduced the dataset to 3,819,087 reads. After the removal of OTUs with total abundance ≤ 50 and
198 taxonomic assignment, the final curated dataset included 2,817,061 reads corresponding to 120
199 different marine taxa. The highest number of taxa were found in **surimi** 102/120 (85%), while the
200 number of taxa contained in **breaded** and **burger** amounted to 23/120 (19%) and 36/120 (30%),
201 respectively (Supplementary Material Table1 and Supplementary Table2).

202 *3.1 Taxonomic overview*

203 Most of the taxa (112) found matched with reference sequences with a level of similarity of
204 between 100-98%. Moreover, of the 120 taxa, 73 of them (60%) were unambiguously assigned at
205 species level, 36 (30%) at genus and 11 (10%) at higher level. Overall, the dataset included 15 orders
206 (13 Actinopterygii, one Cephalopoda and one Malacostraca), 49 families (47 Actinopterygii, one
207 Cephalopoda and one Malacostraca) and 71 genera (69 Actinopterygii, one Cephalopoda and one
208 Malacostraca) (Supplementary Table2). At Class level, Actinopterygii were the only or dominant
209 ingredient in all samples with the exception of Burger S26. Summary of distributions in samples at

210 Order level (Fig. 1) showed Gadiformes dominant in **breaded** but present in all product types, whereas
211 Clupeiformes were exclusively found in **surimi** (only exception **breaded** S13). Salmoniformes were
212 dominant in one **burger** sample while Perciformes were absent in **breaded** products.

213 At genus level, the dataset was dominated by ten genera, nine belonging to the class of Actinopterygii
214 and one to the class of Cephalopoda, representing about 97% of total reads (Fig. 2). The *Gadus* genus
215 represented 45% of total reads with three species (*Gadus chalcogrammus* 41.36%, *Gadus morhua*
216 3.88% and *Gadus macrocephalus* 0.01%). It was the main component in **breaded** samples S8, S21, S30
217 and S33 which made up 99.9% of the reads, but high percentages were also reported within **surimi** S50
218 (90%), **surimi** 41 (59%) and **burger** S24 (38%). *Thunnus* and *Sardinella* genera showed the same total
219 abundance (~15% of total reads). Species level within *Thunnus* genus was not achieved since the
220 molecular region is shared by four species (*Thunnus tonggol*/*Thunnus maccoyii*/*Thunnus thynnus*
221 *thynnus*/*Thunnus albacares*) and distribution in the samples highlighted the genus in **burgers** S12 and
222 S25, in which *Thunnus* was the main component (86% and 95% of reads in sample, respectively).
223 *Sardinella* was exclusively found in **surimi** with abundance in samples ranging between 94-0.5% and
224 included seven different taxa, three of them assigned at species level (*Sardinella aurita*, *Sardinella*
225 *albella* and *Sardinella gibbosa*). The fourth genus was *Sepia* (7% of total dataset), belonging to
226 Decapoda, with two low-abundance taxa assigned at species level (*Sepia hierredda* 0.6% and *Sepia*
227 *pharaonic* 0.01%) plus one more abundant taxa with ambiguous assignment to either *Sepia*
228 *recurvirostra* or *Sepia madokai* (6.7%). Distribution of *Sepia* was limited to Burger samples, with the
229 *Sepia recurvirostra/madokai* complex being the main component (66%) in Burger S26, and *Sepia*
230 *hierredda* reaching 6% in Burger S25. Each of the remaining genera had total abundance lower than
231 5%: *Xiphias* (3.50%), *Dicentrarchus* (2.71%), *Engraulis* (2.51%), *Pleuronectes* (2.49%),
232 *Oncorhynchus* (2.40%), *Decapterus* (1.3%). However, some of them were important components
233 within a single sample. *Oncorhynchus*, including three species (*Oncorhynchus keta*, *Oncorhynchus*

234 *nerka* and *Oncorhynchus mykiss*), was the dominant component (98%) in **burger** sample S27 while
235 *Pleuronectes platessa* represented 83% in **breaded** S13. *Decapterus macarellus* and *Decapterus*
236 *maruadsi* were dominant (68%) in **surimi** S32 and *Engraulis ringens* made up 29% and 24% of the
237 components in **surimi** S36 and S41, respectively. Further, *Xiphias gladius* was the main component in
238 Burger S26 in which it made up 34% of the reads. The other 72 taxa had total read abundances lower
239 than 1%, and were exclusively found in **surimi** with the exception of four taxa (*Platichthys* spp.,
240 Pleuronectidae, *Limanda punctatissima*, *Psettichthys melanostictus*) exclusively present in **breaded**
241 S13, two taxa (*Lota lota*, *Sparus aurata*) only found in **burger** S24 and *Melanogrammus aeglefinus*
242 exclusive of Burger S12. Among these 72 taxa, some of them were important components within a
243 single sample: *Merluccius gayi* (33% in **surimi** S20) and *Merluccius productus* (9% in **surimi** S51);
244 *Nematalosa japonica* represented ~50% of **surimi** S50 and seven different taxa within *Nemipterus*
245 genus formed ~29% of **surimi** S20. *Portunus sanguinolentus* was the only species belonging to
246 Crustacea found in the dataset and its occurrence was restricted to **surimi** S32 in which its abundance
247 was equal to 0.14%.

248 The presence of non-marine taxa was traced to Burger S26, S27 containing *Bos taurus* (0.07%
249 and 0.12%, respectively) and in **burger** S26, **breaded** S33 and S8 containing *Sus scrofa* (0.05%, 0.03%,
250 0.06%, respectively) (Supplementary Table 3).

251 3.2 Diversity of products

252 Box plots of quantitative descriptors of alpha diversity showed signals related to the different
253 types of products (Fig. 3). Details of indices in each sample and statistics are reported in
254 Supplementary Table 5 and Supplementary Table 6. In general, richness (number of observed taxa)
255 showed lower and homogeneous values in **burger** and **breaded** than in **surimi**. The Berger-Parker
256 Dominance and the complementary Evenness indices showed **breaded** as the products dominated by

257 one ingredient in contrast with **surimi**, highlighting more equal mixtures. The NMDS plot in Figure 4
258 included samples and taxa. Samples were grouped by product type and, in NMDS1, values below or
259 above zero split **surimi** from **burger**, with **breaded** in between. The NMDS panels in Figure 5 included
260 only taxa on the same graphical space of samples with taxa being coloured according to the associated
261 descriptors (*Habitus*, *Commercial Importance*, *Price Category* and *Vulnerability to fishery*)
262 summarized in Supplementary Table 1. Surimi products are characterized by pelagic taxa with medium
263 or minor commercial interest and low or low-moderate Vulnerability to fishery while **breaded** and
264 Burger show a prevalence of demersal taxa with medium or high commercial interest and moderate and
265 high Vulnerability to fishery. In terms of price category, **burgers** show a clear prevalence of taxa
266 belonging to high and very high categories, in contrast with **surimi** and **breaded** products.

267

268 3.3 Mislabelling assessment

269 All samples reported the exact term “fish” and the mandatory information of geographical
270 origin in accordance with Regulation (EC) 1169/2011. Fifteen samples were produced in five different
271 European countries (Germany, Italy, Lithuania, Spain and Poland), four samples were produced in
272 China and one in Vietnam. In most of the cases, labels also contained voluntary declaration of species
273 with **breaded** 2/5 (40%), **burger** 5/5 (100%) **surimi** 6/10 (60%). Overall, using the criteria defined
274 above, analyses of declared ingredients in labels and metabarcoding data revealed mislabelling in 9/20
275 (45%) samples (Table 1). Based on the kind of products, non-compliances were differently distributed:
276 2/5 (40%) samples in **breaded**, 4/5 (80%) in **burger** and 3/10 (30%) in **surimi**. Based on the kind of
277 frauds, in most of the cases samples failed to match the voluntarily declared scientific names in the
278 ingredient list (7/9 samples 77.8%) while in 2/9 (22.2%) samples we detected the unreported presence
279 of molluscs. Details of substitutions showed that, in **breaded** S8, *Merluccius gayi* was substituted with
280 *Gadus chalcogrammus*, while in Burger *Sepiella japonica* was substituted with *Sepia* spp. (S25, S26),

281 and *Salmo salar* was substituted with *Oncorhynchus* spp. (S27). In the three mislabelled surimi
282 samples, *Nemipterus nemipterus* was substituted with a mix of species dominated by *Sardinella aurita*
283 (85% in S18), in S51 *Merluccius gayi* was substituted with *Merluccius productus* and in S50
284 *Nemipterus virgatus* was substituted with a mix of species that failed to include the one declared on the
285 label (*Nematalosa japonica* 49.17%, *Lepidotrigla grandis* 18.68%, *Trachurus* spp. 13.71%,
286 *Chelidonichthys kumu/spinosus* 12.29%, *Auxis rochei* 3.07%, *Saurida undosquamis* 2.6%). The cases
287 of unreported presence of molluscs showed traces (< 0.05%) of *Sepia* spp. in one Burger (S12) and one
288 breaded (S13) product.

289 Molecular identifications also highlighted the presence of 21 taxa (17.5% of total taxa) not included
290 in the MiPAAF 2017 Decree, most of which (19) were found to be widespread in seven of the surimi
291 samples. The other two taxa were found in Burger products, with *Sepia hierredda* in S12 and S25 and
292 *Psettychthys melanostictus* in S13 (Supplementary Table1). Yet, with a similarity of 100% we
293 identified traces (< 0.1%) of a Tetraodontidae taxa not assigned at species level (shared sequence
294 *Takifugu fasciatus/Lagocephalus wheeleri/Lagocephalus lunaris*) in three surimi samples (S17, S18,
295 S34).

296

297 **4. Discussion**

298 The general pattern obtained in our study reveal the complex structure and heterogeneity of the
299 ingredients used in the mixed fishery products, with several implications and consequences for
300 consumers, also highlighting the weakness of current labelling legislation and the need for regular
301 monitoring. High level of detail is now available thanks to the new generation of sequencers allowing
302 the simultaneous sequencing of multiple DNA molecules, that are a powerful tool for tracing
303 ingredients in complex matrices that had not been traceable in the past. In this study, the high

304 sequencing depth (almost five million raw reads) and the universality of primers used (15 orders, 49
305 families and 71 genera), reveal an unexpectedly high complexity within the twenty mixtures, that had
306 not previously been reported. Despite the short length (about 200 bp), the mitochondrial 16S rRNA
307 mini-barcode fragment used allowed assignment at species level in 60% of the taxa, with failures
308 including genera such as *Thunnus*, *Scomber* and *Sardinella* for which the difficulty of discrimination to
309 species level even using the full DNA barcoding fragments has previously been reported (Catanese et
310 al., 2010; Chan et al., 2019; Viñas et al., 2009). Beside marine taxa, the good taxonomic coverage
311 provided by the primers includes the capability to trace the presence of ingredients from terrestrial
312 mammals (bovine and swine) that is a critical point for consumer protection based on ethical or
313 religious issues (Xing et al., 2019). However, tests in silico (data not shown) highlighted the difficulty
314 for these primers to amplify chicken, making it unable to trace components such as *eggs* that, even
315 though they were reported on the labels of some samples, were lost in our taxonomic assessment.

316 Although processed fish products shared the labelling system governed by EU Regulation
317 1169/2011, our study shows evidence of strong heterogeneity in structure and composition of products
318 included under the umbrella term of *processed product*. As a general trend, number of species and their
319 evenness are higher in **surimi**, but this is not a hard and fast rule, so the number of species in the
320 mixtures could differ based on brand and production country (Galal-Khallaf et al., 2016). Among the
321 27 families of fish included in the table generated by Giusti et al. (2017b) for surimi, only 15 are shared
322 with the 46 fish families found as ingredients in our **surimi** samples, highlighting the huge marine
323 biodiversity included in this type of product, and raising concern for their origin and negative impact
324 on ecosystems. For **breaded** and **burger**, our data represent the first overview and suggest a more
325 limited number of ingredients in their matrices, especially in **burger**.

326 Overall, this study underlines a 45% mislabelling rate, with non-compliance mainly due to
327 incongruences in the voluntary declared scientific names in the ingredient list (78%), and 22% of

328 samples containing the unreported presence of molluscs. Surprisingly, the highest non-compliance
329 value was found in Burger products (80%), a less processed product mainly obtained from fish fillets or
330 from fish pulp and containing lower number of taxa, whereas lower mislabelling rates were reported in
331 breaded fish, (40%) and surimi (30%), usually considered highly processed products. However, it
332 should be taken into account that the mislabelling was the result of a voluntary declaration by
333 manufacturers on the product labels, presumably as a marketing strategy to target an audience of more
334 aware consumers for whom additional detailed information on the product labels plays an important
335 role in a positive perception of safe and healthy food. By contrast, breaded products undergo a higher
336 degree of processing, targeting consumers (like teenagers or young adults) who do not like the taste of
337 fish and are less interested in the details of the fish used as ingredients. In this case, the strategy of
338 omitting species names enables industries to use any species as an ingredient, thus lowering the
339 potential risk of mislabelling and reducing the danger of losing clients.

340 Therefore, although our inferences need to be confirmed with a higher number of samples, the
341 results suggest the labels of processed products, both those with a voluntary declaration or worth
342 omission of species names, cannot be used by consumers as a proxy of product safety, but are probably
343 part of the marketing policies applied in different products by manufacturers.

344 The current legislation governing processed seafood is EU Regulation 1169/2011, the Food
345 Information to Consumer Regulation (FIC), which aims to achieve a high level of consumer health
346 protection and to guarantee their right to information, so that they can make informed choices and
347 prevent practices that risk misleading the consumer. EU Regulation 1169/2011 does not include a list
348 of mandatory information but simply provides for the designation of all fish species in which fish is an
349 ingredient in a food and, provided that the name and presentation of this food do not refer to a specific
350 fish species, it can be designated just with the name of a category such as "fish" rather than with a
351 specific name (Di Pinto et al., 2016). The bland information required in labels is probably related to the

352 fact that it used to be impossible to verify which species were used as ingredients in the mixtures. In
353 this regard, a future EU consumer protection Regulation could, instead, make a species list mandatory,
354 given that advanced molecular approaches are now available which can successfully trace species in
355 complex matrices. Therefore, the NGS technology, which can reveal deliberate substitution/addition of
356 non-authentic food products, protects and promotes fish products against fraud and species substitution
357 and guarantees accurate food labelling and the legal base requirements, which are so crucial for an
358 innovative food-safety management system.

359 The mislabeling rates found in our dataset are in line with other studies, showing that surimi
360 contained a 25% presence of molluscs not indicated on the label (Giusti et. al 2017b) and similar
361 overall mislabelling rates within highly processed cod products (Carvalho et. al 2017) and surimi
362 (Giusti et. al 2017b). However, a clear comparison with the mislabelling rates reported in other studies
363 using NGS in processed seafood is somewhat difficult due to the low number of samples usually
364 analysed with this approach.

365 Only one substitution could be directly linked with economic gain, involving a species from a
366 higher price category substituted with a lower one, as in the case of *Nemipterus nemipterus* substituted
367 with a mix of species dominated by *Sardinella aurita*. Less clear is the substitution of *Nemipterus*
368 *virgatus* with a mixture including species belonging to different price categories, whereas all the other
369 substitutions involve species with similar commercial value or price, as in the cases of *Merluccius gayi*
370 with *Gadus chalcogrammus*, *Sepiella japonica* with *Sepia* spp., *Merluccius gayi* with *Merluccius*
371 *productus*, and *Salmo salar* salmon from the Atlantic substituted with *Oncorhynchus* spp. (Pacific
372 salmon).

373 In addition to mislabelling, samples include low-frequency taxa not reported in the list of
374 ingredients, or even not included in the latest MiPAAF Decree dating back to 2017. These taxa could
375 be related to technological processes for mixing fish products, such as the addition of gelatines to

376 improve texture and rheological characteristics (i.e. viscosity, texture and stability). Actually, only
377 some taxa found in our samples (*Trachurus* spp., *Lutjanus*, *Priacanthus*, and *Oreochromis niloticus*)
378 are known to be used as an alternative to mammalian gelatine by food industries to overcome ethical
379 and religious limitations (Li et al., 2018; Liu et al., 2007). However, in one **burger** and two **surimi**
380 samples, we also found swine DNA, probably added as gelatine obtained from porcine skin. This poses
381 important religious and ethical consequences for consumers with cultural and religious dietary
382 requirements such as Muslim (Halaal) and Jewish (Kashrut) believers who are not allowed to consume
383 pork (Hernández-Briones et al., 2009). By contrast, the presence of bovine DNA in two samples
384 corresponds to the 'cheese' reported on the label.

385 The low-abundance taxa found involved health implications for consumers due to the traces of
386 Tetraodontidae, containing Tetrodotoxin, a neurotoxin with a paralyzing effect, found in three **surimi**
387 samples. These taxa, banned from the Europe market (Regulation EC No 854/2004), are currently sold
388 in Asian countries, such as Taiwan or Japan, and mislabelling involving *Lagocephalus* spp. has been
389 reported at a Chinese market in substitution of products commercialized under the generic name Cod
390 (Xiong et al., 2016) or angelfish (Li et al., 2016), but also in products sold in Europe (Armani et al.
391 2015; Giusti et al. 2018). However, in our study, the samples have different geographic origins (Italy,
392 China, Lithuania) highlighting how international trading and expansion of the supply chain affect
393 traceability and can lead to increases in fraudulent behaviours, even involving species associated with
394 health risks to European consumers (Sameera & Ramachandran, 2016). Moreover, even though
395 information on allergens must be provided to consumers under EU Regulation 1169/2011, in our data,
396 two samples reveal the unreported presence of molluscs among the low frequency taxa, confirming the
397 general concern regarding allergenic taxa. Seafood allergies are the most common food allergies and
398 adverse health issues can occur even in the presence of small percentages of molluscs, and so, in the
399 absence of a clear safe allergen threshold, this information is mandatory under European labeling

400 legislation. By contrast, traces of the potential allergenic Crustacea *Portunus sanguinolentus*, found in
401 a **surimi** sample, had been correctly reported on the label.

402 Patterns of the substitutions and the high number of low-abundance taxa found in samples, even
403 thought they may be involuntary cases of substitution linked to the presence of morphologically similar
404 traits and / or to the lack of specific training of fisheries operators, confirm that processed seafood is an
405 important channel used by manufacturers to recycle discards and fish waste, generated by the filleting
406 process, including viscera, heads, fins, skins, scales, and bones (Palmeira et al. 2016; Rustad et al.,
407 2011). The FAO 2018 report revealed that 35% of global catches are wasted, becoming by-catch or
408 discarded from trawlers where fish are thrown back dead because they are too small or an unwanted
409 species. Of course, the possibility to use such material to produce food for human consumption would
410 help boost profits for the fishing industry. In terms of health, the discarded species are often small, with
411 a lower risk of mercury accumulation than some fish species of higher commercial value (Simeone &
412 Scarpatò, 2014), whereas more studies are needed to clarify the impact of microplastics from discarded
413 tissues (Hantoro et al. 2019). Moreover, also other aspects need to be monitored because fish discards,
414 even though they have low or no commercial value, can include rare, endangered or protected as well
415 as toxic species with untraceable impacts on marine ecosystems and consumer health.

416 The complexity of the components in seafood products makes assessing sustainability far from
417 easy, given that to fisheries and to ecosystems the term sustainability takes on two rather different
418 meanings, in the former referring to stocks while the second focuses on the trophic web as a whole. In
419 assessments of whole specimens or fillets, the inclusion of taxa listed in the Convention on
420 International Trade in Endangered Species (CITES) or Red List of Threatened Species of the
421 International Union for Conservation of Nature (IUCN, www.iucnredlist.org) can be directly linked
422 with the sample, and it is usually an indication of lower sustainability. Furthermore, commercially
423 important species can also be on the IUCN Red List or even considered to be at different levels of risk

424 on the various IUCN lists at global or local scale, as is the case for *Prionace glauca* (considered NT at
425 global scale but CR in the Mediterranean Sea). Moreover, in processed products, we cannot identify the
426 real source of the DNA (wild or farmed specimens, discards or fish waste) and no such information is
427 mandatory on the label. This makes it difficult to perform a correct and complete evaluation because,
428 even the presence of DNA of a threatened species could be due to the use of discarded tissues, and thus
429 considered in some ways more sustainable.

430 Overall, the profiles generated suggest that **surimi** is a more sustainable product than **breaded** and
431 **burger** and characterized by taxa with medium or lesser commercial interest and low or low-moderate
432 Vulnerability to fishery. The presence of small pelagic forage fishes, especially belonging to the
433 *Sardinella* genus, is in line with a previous study which evaluated ecological sustainability in surimi
434 using the trophic level of ten taxa generated by a PCR-cloning approach (Galal-Khallaf et al., 2016).
435 Indeed, the price category profile of taxa used as ingredients confirms **surimi** to belong to a market
436 segment targeting and attracting consumers for their competitive price. Breaded and **burger** profiles
437 show a prevalence of demersal taxa with medium or high commercial interest and moderate and high
438 Vulnerability to fishery. Based on the price profile, **burger** can be considered a luxury processed
439 seafood product, targeting more aware and carefully selected consumers who require a more accurate
440 labelling system, which should include information on the wild or farmed origin of taxa, since some of
441 the species in our Burger samples were probably farmed (*Dicentrarchus labrax*, *Oncorhynchus* spp.
442 and *Thunnus* spp). This information, as well the indication of the inclusion of fish waste, need to be
443 part of the future labelling system for all processed products so as to make it easier to assess its
444 sustainability as well as affording better protection for consumers.

445

446 **5. Conclusions**

447 Our study shows that NGS metabarcoding is a robust, powerful and reliable methodology able to
448 analyse highly processed multi-species fish products, which make up a growing market segment, due
449 both to the modern lifestyles of consumers and to the profit expectations of the fish industry. Beyond
450 the mislabelling rates, results from samples raise concern due to the high number of taxa contained that
451 are unknowingly eaten by consumers and, in the absence of controls, fished from the oceans. The
452 recycling of discards or fish waste is positive, decreasing the environmental impact of fisheries, but
453 shady areas and potential risks are evident. In this context, the current labelling system is a very weak
454 instrument both when it comes to consumer safety and for conscious choices and may form part of the
455 manufacturers' marketing strategies. An adequate revision of national and international food safety
456 legislations would be a huge challenge for policymakers, but metabarcoding assessments could help
457 both by providing useful information and acting as the operational tool for inspective monitoring.

458

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466

467 **Figure captions**

468 **Figure 1.** Relative read abundance at Order level in samples of breaded, burger and surimi.

469 **Figure 2. Bubble plot.** Proportion of taxa reads found in samples at genus level.

470 **Figure 3. Alpha diversity indices.** a) Richness; b) Berger Parker dominance; and c) Pielou evenness.

471 **Figure 4. NMDS ordination based on Bray-Curtis matrix.** The plot includes the ID samples (blue:

472 **surimi**; green: **breaded**; pink: **burger**) and the ID of taxa in red. Stress 0.175.

473 **Figure 5. NMDS based on Bray-Curtis matrix where only taxa were plotted.** Taxa were coloured

474 based on the associated descriptors (Habitus, Commercial importance, Price category and Vulnerability
475 to fishery).

476

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666 **Table 1.** Description of samples and summary of mislabelling assessment (in bold). The column Ingredients
667 includes potential sources of detectable DNA. Molecular identification includes taxa with abundances >1%.
668 Taxa with lower abundances were included in the following cases: taxa were declared as ingredient, non-marine
669 taxa, allergenic or toxic taxa.

Sample ID	Production site	Type of product	Packaging	Commercial denomination	(Main) Ingredients	Declared species	Molecular Identification	Mislabeling
S8	Italy	Breaded	Frozen	Cooled breaded fish cutlets	Hake (47%). May contain trace of crustacea, molluscs	<i>Merluccius gay</i>	<i>Gadus chalcogrammus</i> 99.9%, <i>Sus scrofa</i> 0.06% (*)	Yes (2)(*)
S13	Germany	Breaded	Frozen	Sea cutlets	Fish (47%)	ND	<i>Pleuronectes platessa</i> 82.54%, <i>Gadus chalcogrammus</i> 6.9%, <i>Anchoa nasus</i> 6.65%, <i>Pleuronectes</i> spp. 1%, <i>Sepia</i> spp. 0.01% (3)	Yes (3)
S21	Poland	Breaded	Frozen	Fish sticks	Fish (56%). May contain crustacea, eggs, milk, molluscs	ND	<i>Gadus chalcogrammus</i> 61.01%, <i>Gadus morhua</i> 38.94%	No
S30	Germany	Breaded	Frozen	Fish sticks	Minced fish (65%)	<i>Theragra chalcogramma</i>	<i>Gadus chalcogrammus</i> 99.99%	No
S33	Germany	Breaded	Frozen	Fish nuggets - Funny fish	Minced fish (48%)	ND	<i>Gadus chalcogrammus</i> 99.92%, <i>Sus scrofa</i> 0.03% (*)	No (*)
S17	Italy	Surimi	Frozen	Surimi stiks	Surimi (fish) 45%, egg whites, (contain crustaceans). May contain trace of molluscs	ND	<i>Sardinella</i> spp. (1) 73.49%, <i>Gadus chalcogrammus</i> 12.24%, <i>Hirundichthys marginatus</i> 2.44%, <i>Sardinella</i> spp. (3) 2.41%, <i>Sardinella</i> spp. (2) 2.01%, <i>Merluccius productus</i> 1.23%, <i>Engraulis ringens</i> 1.16%	No (**)
S18	China	Surimi	Frozen	Surimi stiks	Surimi (fish- <i>Nemipterus-Nemipterus</i>) 40%, crab extract, crab flavour, egg whites	<i>Nemipterus-Nemipterus</i>	<i>Sardinella aurita</i> 85.71%, <i>Decapterus maruadsi</i> 6.71%, <i>Sardinella</i> spp. (1) 2.68%, <i>Selar crumenophthalmus</i> 2.43%, <i>Rastrelliger kanagurta</i> 1.05%	Yes (2)
S19	China	Surimi	Frozen	Surimi Crab Claw	Surimi (fish: <i>Chelidichthys kumu</i>) 40%, crab claws, crab flavour. Contains fish, egg, crab	<i>Chelidichthys kumu</i>	<i>Sardinella</i> spp. (1) 57.39%, <i>Sardinella aurita</i> 33.68%, <i>Carangidae</i> 1.81, <i>Sardinella</i> spp. (3) 1.67, <i>Sardinella</i> spp. (2) 1.02%, <i>Chelidichthys</i> spp. 0.02%	No (**)

S20	Vietnam	Surimi	Frozen	Surimi stiks-shrimp flavour	Surimi (fish: <i>Nemipterus nemurus</i> and <i>Nemipterus japonicus</i>) 45%, egg whites, shrimp flavour	<i>Nemipterus nemurus</i> and <i>Nemipterus japonicus</i>	<i>Merluccius gayi</i> 31.86%, <i>Parupeneus heptacanthus</i> 10.40%, <i>Priacanthus macracanthus</i> 9.35%, <i>Nemipterus</i> spp. (1) 9%, <i>Pomadasyss maculatus</i> 7.29%, <i>Nemipterus</i> spp. (2) 7.04%, <i>Nemipterus mesoprion</i> 4.57%, <i>Nemipterus</i> spp. (3) 3.06%, <i>Nemipterus bathybius</i> 2.52%, <i>Upeneus</i> spp. 2.60%, <i>Pristipomoides multidentis</i> 2.32%, <i>Pterois volitans</i> 2.26%, <i>Iniistius</i> spp. 1.48%, <i>Sillago ingenuua</i> 1.23%	No (**)
S32	China	Surimi	Frozen	Surimi Crab Claw	Surimi (fish: <i>Chelidichthys kumu</i>) 40%, crab claws, crab flavour, Contains fish, egg, crab	<i>Chelidichthys kumu</i>	<i>Decapterus maruadsi</i> 37.40%, <i>Decapterus macarellus</i> 31.07%, <i>Gadus chalcogrammus</i> 5.79%, <i>Lutjanus</i> spp. 5.72%, <i>Carangidae</i> 5.43%, <i>Nematalosa japonica</i> 3.45%, <i>Ariomma luridum</i> 1.89%, <i>Trachurus</i> spp. 1.52%, <i>Chelidichthys</i> spp. 0.21%, <i>Portunus sanguinolentus</i> 0.14%	No
S34	Lithuania	Surimi	In brine	Surimi exotic salad	Surimi 62% (fish:21%), egg whites	ND	<i>Sardinella</i> spp. 46.38, <i>Sardinella albella</i> 18.42%, <i>Dussumieria elopsoides</i> 7.74%, <i>Rastrelliger kanagurta</i> 6.91%, <i>Carangidae</i> 4.45%, <i>Caranx</i> spp. 3.30%, <i>Merluccius gayi</i> 2.43%, <i>Scomber</i> spp. 1.71%, <i>Engraulis ringens</i> 1.81%, <i>Sardinella</i> spp. (2) 1.24%, <i>Sardinella</i> spp. (1) 1.16%	No (**)
S36	Lithuania	Surimi	Frozen	Surimi Claw - Crab flavour	Surimi 78% (fish: 33%), white egg, crab, crustacea, fish, molluscs	ND	<i>Engraulis ringens</i> 28.47%, <i>Sardinella</i> spp. 25.29%, <i>Sardinella</i> spp. 23.45%, <i>Sardinella gibbosa</i> 8%, <i>Hirundichthys marginatus</i> 5.34%, <i>Gadus chalcogrammus</i> 3.05%, <i>Thryssa</i> spp. 2.36%;	No (**)

S41	Spain	Surimi	Frozen	Frozen surimi stiks	Surimi (fish) 40%, crab flavour, egg yolk, egg whites. May contain milk, celery, molluscs trace	ND	<i>Gadus chalcogrammus</i> 59.09%, <i>Engraulis ringens</i> 23.65%, <i>Sardinella</i> spp. (1) 6.19%, <i>Sardinella</i> spp. (2) 6.03%, <i>Sardinella albella</i> 3.10%, <i>Merluccius productus</i> 1.34%	No (**)
S50	China	Surimi	Frozen	Surimi Claw - Crab flavour	Surimi 36% (fish - <i>Nemipterus virgatus</i>), crab flavour, crab claws, Allergens: eggs, shellfish, fish	<i>Nemipterus virgatus</i>	<i>Nematalosa japonica</i> 49.17%, <i>Lepidotrigla grandis</i> 18.68%, <i>Trachurus</i> spp. 13.71%, <i>Chelidichthys</i> spp. 12.29%, <i>Auxis rochei</i> 3.07%, <i>Saurida undosquamis</i> 2.60%	Yes (2)
S51	Lithuania	Surimi	Modified atmosphere	Surimi slices	Surimi 42% (fish - <i>Merluccius gayi</i> and <i>Gadus chalcogrammus</i>) egg whites, crab flavour. May contain milk, molluscs trace	<i>Merluccius gayi</i> and <i>Gadus chalcogrammus</i>	<i>Gadus chalcogrammus</i> 90.29%, <i>Merluccius productus</i> 9.42%	Yes (2)
S12	Italy	Burger	Frozen	Frozen tuna burger	Yellow fin tuna (40%), Atlantic cod, eggs whites	<i>Thunnus albacares</i> and <i>Gadus morhua</i>	<i>Thunnus</i> spp. 86.20%, <i>Gadus morhua</i> 11.78%, <i>Gadus chalcogrammus</i> 1.73%, <i>Sepia hierredda</i> 0.03% (3) (**)	Yes (3) (**)
S24	Italy	Burger	Frozen	Frozen sea bass burger	Sea bass (45%) (<i>Dicentrarchus labrax</i>), Atlantic cod (<i>Gadus morhua</i>), eggs whites, potato flakes	<i>Dicentrarchus labrax</i> and <i>Gadus morhua</i>	<i>Dicentrarchus labrax</i> 61.61%, <i>Gadus morhua</i> 38.18%	No
S25	Italy	Burger	Defrost, modified atmosphere	Tuna burger	Yellow fin tuna (63%), Japanese spineless cuttlefish, cheese. May contains trace of molluscs, eggs	<i>Thunnus albacares</i> and <i>Sepiella japonica</i>	<i>Thunnus</i> spp. 94.15%, <i>Sepia hierredda</i> 5.83% (**) , <i>Sepia</i> spp. 0.01%	Yes (2) (**)
S26	Italy	Burger	Defrost, modified atmosphere	Swordfish burger	Swordfish 58%, Japanese spineless cuttlefish, cheese. May contains trace of molluscs, eggs	<i>Xiphias gladius</i> and <i>Sepiella japonica</i>	<i>Sepia</i> spp. 65.52%, <i>Xiphias gladius</i> 34.35%, <i>Bos taurus</i> 0.07% (*) , <i>Sus scrofa</i> 0.05% (*)	Yes (2) (*)
S27	Italy	Burger	Defrost, modified atmosphere	Salmon burger	Salmon 58%, South African hake, cheese. May contains trace of molluscs, eggs	<i>Salmo salar</i> and <i>Merluccius capensis</i> or <i>Merluccius paradoxus</i>	<i>Oncorhynchus keta</i> 96%, <i>Oncorhynchus nerka</i> 1.95%, <i>Sepia</i> spp. 1.42%, <i>Merluccius paradoxus</i> 0.22%, <i>Bos taurus</i> 0.12% (*)	Yes (2) (*)

- 670 1) labels did not report the precise term 'fish' among the ingredients
671 2) the voluntarily declared species did not correspond to that detected by the molecular analysis
672 3) detection of molluscs not declared on the label
673 (*) non-marine taxa

674 (**) The analysis revealed the presence of species not included on the list of agreed commercial designations for use,
675 contained in MiPAAF Decree 2017
676 ND: not declared