

General requirements for export of fishery products to the EU

Aina Afanasjeva, Director, EUROFISH

TCP Workshop “MARKET REQUIREMENTS FOR THE AQUACULTURE INDUSTRY IN CROATIA”

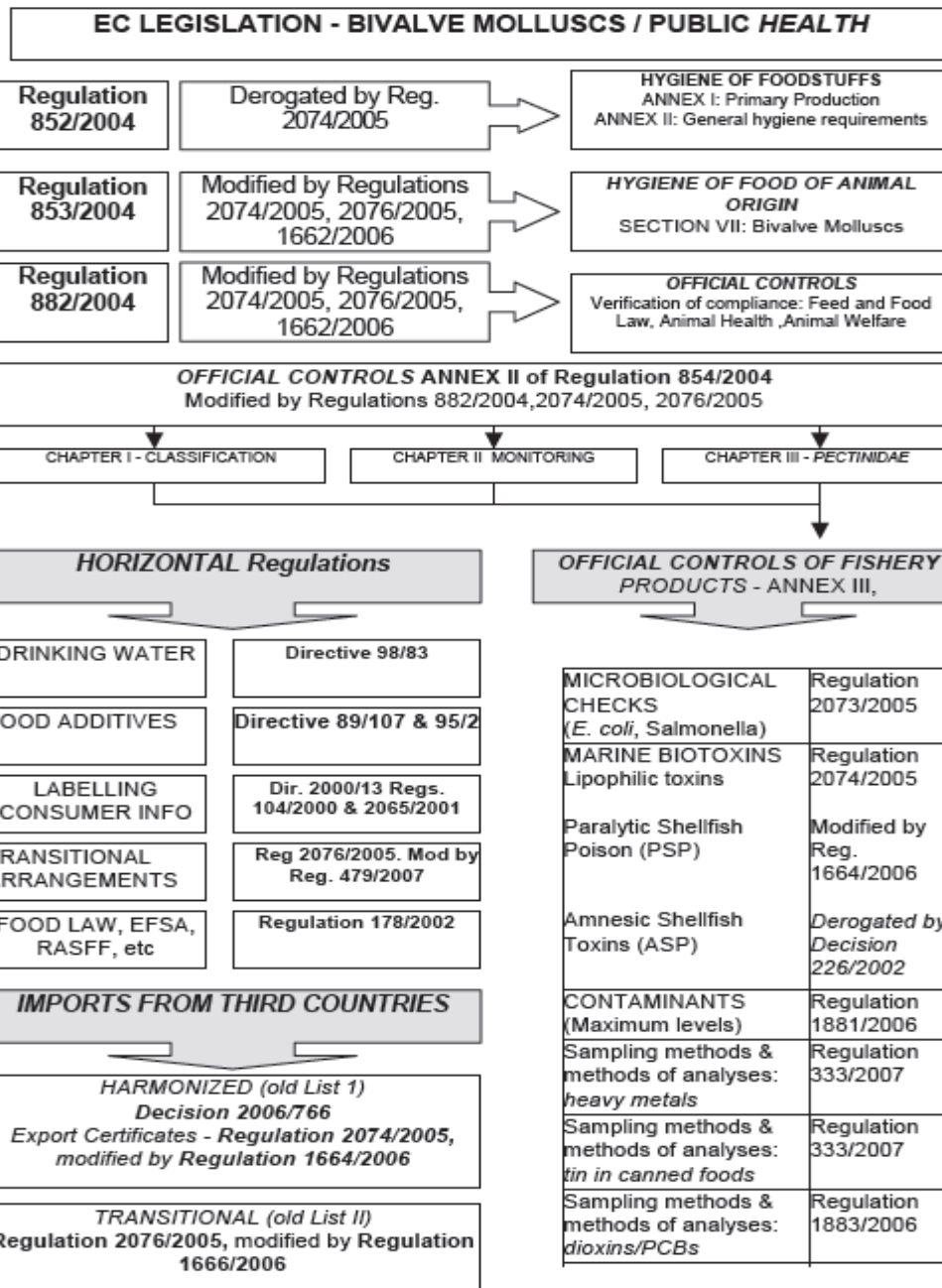
Zadar, Croatia, 8-10 May 2012



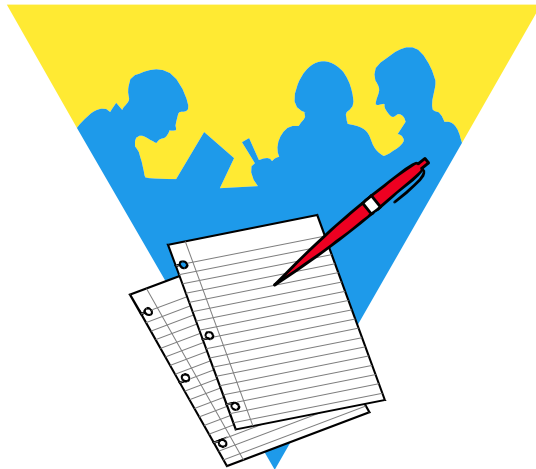
Structure



- General hygiene requirements
- Traceability
- Rapid Alert System (RASFF)
- TRACES (TRAde Control and Expert System)
- Your Guide – Export help desk



General hygiene rules



- Importing country should have the authorised Competent Authority responsible for the organisation of official control;
- Competent Authority provides the EC with a list of approved establishments;
- Competent Authority guarantees companies' continued compliance with EU requirements;
- Competent Authority is checked by the Food and Veterinary Office to see if they are doing the job

General hygiene rules

- Health certification:
 - (a) Countries authorised for exporting fishery products to the EU -
Decision 2006/766/EC – imports of bivalve molluscs and fishery products
Decision 2011/163/EU – imports of aquaculture products
 - (b) Approved establishments –
https://webgate.ec.europa.eu/sanco/traces/output/FFP_HR_en.pdf
 - (c) Fishery products exported to the EU must be accompanied by a health certificate;
 - (d) On arrival in the EU, the animal products and the accompanying certificates must be verified and checked by EU official veterinarians at a designated Border Inspection Post (BIP)

General hygiene rules

Regulation **852/2004** On the hygiene of foodstuffs requires that:

As regards the hygiene of imported food, Articles 3 to 6 of this Regulation applies:

- General obligation to satisfy the relevant hygiene requirements (layout, design, construction, etc.),
- General and specific requirements (compliance with microbiological criteria, temperature control requirements, sampling and analysis, etc.);
- Hazard analysis and critical control points,
- Official control, registration and approval



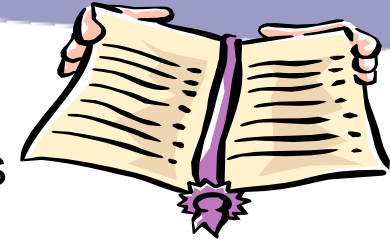
General hygiene rules

Regulation 853/2004 requires that:

The Competent Authority has **registered** establishments carrying out only:

- Primary production
- Transport operations
- The storage of products not requiring temperature-controlled storage conditions
- Retail operations

The Competent Authority has **approved** all other establishments handling products of animal origin (except those mentioned above)



General hygiene rules

The products coming from aquaculture must comply with:

- Commission Decision 2003/858/EC laying down the animal health conditions and certification requirements for imports of live fish, their eggs and gametes intended for farming, and live fish of aquaculture origin and products thereof intended for human consumption (*intended for farming, restocking, human consumption, further processing, immediate consumption and different health certificate models*);
- The animal health conditions governing the placing on the market of aquaculture animals and products are defined in Directive 2006/88/EC (*traceability, health certification, declaration of disease free zones, etc.*)
- Countries should have approved residue monitoring plans (*Council Directive 96/23/EC*)

Traceability

- Regulation EC/178/2002 lays down the general principles and requirements of food law (ec.europa.eu/food/food/foodlaw/index_en.htm) defines traceability as a compulsory rule in order to trace and follow food, feed and ingredients through all stages of production, processing and distribution, and it is a cornerstone of the EU's food safety policy;
- Traceability is a risk-management tool which allows food business operators or authorities to withdraw or recall products which have been identified as unsafe



Traceability



- Food business operators are required to document:
 - ✓ Name, addresses of supplier and identification of products supplied,
 - ✓ Name, address of direct recipient and identification of products delivered,
 - ✓ Date and, where necessary, time of transaction/delivery,
 - ✓ Volume, where appropriate, or quantity
- General rule for keeping records is 5 year period, however, (i) for products which have a "use by" date less than 3 months records could be kept for the period of 6 months after date of manufacturing or delivery, (ii) for products with a "best before" date records could be kept for the period of the shelf-life plus 6 months

Traceability

Aquaculture production businesses must keep a record of:

- (a) all movements of aquaculture animals into and out of the farm or molluscs farming area;
- (b) the mortality in each epidemiological unit;
- (c) results of the risk-based animal health surveillance scheme

Traceability

- When aquaculture animals are transported, transporters must keep a record of:
 - (a) mortality during transport;
 - (b) farms, mollusc farming areas and processing establishments visited by the means of transport;
 - (c) any water exchange during transport, in particular the sources of new water and site of release of water
- All movements of animals recorded by the aquaculture business operators should be done in such a way that the tracing of the place of origin and destination can be guaranteed

Traceability

Business operators rearing animals or producing primary products of animal origin must also keep records on:

- (a) the nature and origin of feed fed to the animals;
- (b) veterinary medicinal products or other treatments administered to the animals, dates of administration and withdrawal periods

Traceability

- The traceability provisions do not have an extra-territorial effect outside the EU. This requirement covers all stages of production, processing and distribution in the EU, namely from the EU importer up to retail level, excluding supply to the final consumer
- If exporters from 3rd countries are required to fulfill this requirement, such requests are part of contractual arrangements with the trading partners and not requirements established by the Food law
- The guidance document is available on the website of DG Health and Consumer Protection:

http://europa.eu/comm/food/food/foodlaw/guidance/index_en.htm



Rapid Alert System



Regulation **EC/178/2002** establishes:

- A Rapid Alert System for the notification of a direct or indirect risk to human health deriving from food or feed;
- It is a tool to enable the quick and effective exchange of information between MS and the EC

Rapid Alert System

- All members of the RASFF (EU-27, EC, EFSA, EEA, Norway, Liechtenstein, Iceland and Switzerland) have a round-the-clock service
- All member organisations of the RASFF – where contact points are identified – are listed and their home pages can be consulted on:

http://ec.europa.eu/comm/food/food/rapidalert/members_en.htm

Rapid Alert System



An 'alert notification' or 'alert' is sent when a food, feed or food contact material presenting a serious risk is on the market and when rapid action is or might be required in another country than the notifying country. Products subject to an alert notification have been withdrawn or are in the process of being withdrawn from the market

Rapid Alert System



An 'information notification' concerns a food, feed or food contact material for which a risk has been identified that does not require rapid action, e.g. because the food or feed has not reached the market or is no longer on the market (of other member countries than the notifying country)

Rapid Alert System



A 'border rejection notification' concerns a consignment of food, feed or food contact material that was refused entry into the Community for reason of a risk to human health and also to animal health or to the environment if it concerns feed

Rapid Alert System



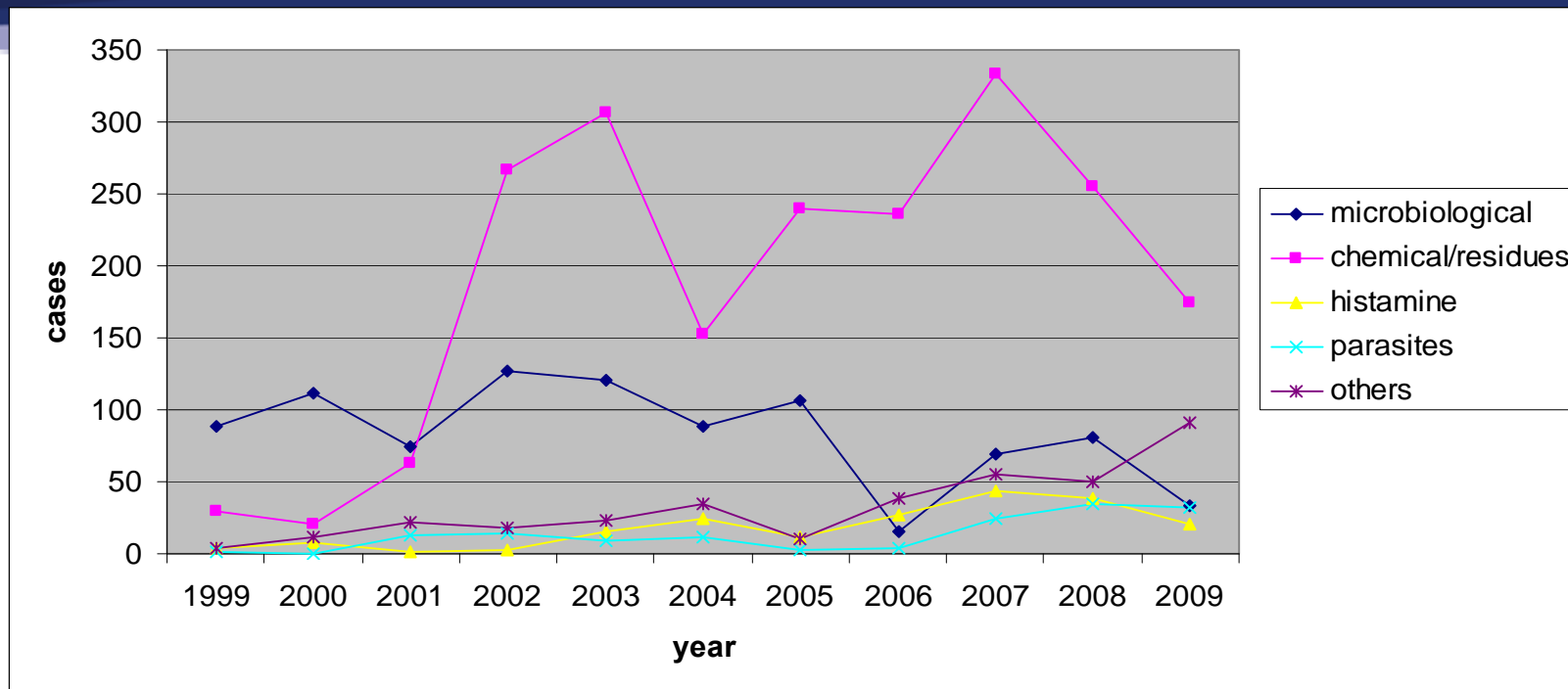
Any information related to the safety of food and feed products which has not been communicated as an alert or an information notification, but which is judged interesting for the control authorities, is transmitted to the members under the heading 'News'

Rapid Alert System

- Prohibited substances or ingredients
- Unauthorised substances or ingredients
- Exceeding of legal limits (microbiological, chemical/residues, histamine)
- Unauthorised establishment for food of animal origin
- Unauthorised novel food / GM food
- Physical risk (foreign bodies)
- Incorrect labelling implying health risk
- Other risk based on risk assessment



RASFF NOTIFICATIONS, 1999-2009



	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
microbiological	89	111	75	127	120	89	107	15	69	81	33
chemical/residues	29	21	63	267	307	153	240	236	333	255	175
histamine	4	8	1	3	15	25	11	27	44	38	20
parasites	1	0	13	14	9	11	3	4	25	34	32
others	4	12	22	18	23	35	10	38	55	50	91
total	127	152	174	429	474	313	371	320	526	458	351

Rapid Alert System

- In 2010, a total of 3,358 original notifications were transmitted through the RASFF, of which 592 were classified as alert, 1,188 as information and 1,578 as border rejection notifications;
- Alert notifications were about the presence of pathogenic microorganisms, heavy metals, allergens and mycotoxins;
- Concerning fishery products the most reported were cases concerning:
 - *Anisakis* parasites in chilled and frozen fish (61 notification),
 - *Listeria monocytogenes* in smoked salmon and frozen pangasius (57 notifications),
 - *Escherichia coli* in live bivalve molluscs (32 notifications)

Rapid Alert System

3804.	information	28/07/2010	28/07/2010	2010.1036	IT	too high content of sulphite (368 mg/kg - ppm) in rose shrimps from Croatia	crustaceans and products thereof
7821.	border rejection	16/03/2012	23/03/2012	2012.AQK	IT	mercury (1.903 mg/kg - ppm) in chilled livers and raws of dogfish (<i>Scyliorhinus canicula</i>) from Croatia	fish and fish products
8108.	information for attention	13/10/2011	03/11/2011	2011.1426	IT	parasitic infestation with <i>Anisakis</i> of salted anchovies from Croatia	fish and fish products
8184.	information	02/09/2009	04/10/2011	2009.1138	IT	mercury (2.09 mg/kg - ppm) in greater amberjack (<i>Seriola dumerili</i>) from Croatia	fish and fish products
8312.	border rejection	03/05/2010	21/07/2011	2010.AUJ	SI	histamine in chilled anchovy (<i>Engraulis encrasicolus</i>) from Croatia	fish and fish products
8317.	information	08/05/2009	20/07/2011	2009.0588	SI	histamine (151; 56; 36; 25; <20; 38; 466; 91; 182 mg/kg - ppm) in canned tuna fillets in olive oil from Croatia	fish and fish products

Notification detail - 2012.AQK

mercury (1.903 mg/kg - ppm) in chilled livers and raws of dogfish (*Scyliorhinus canicula*) from Croatia

Reference : 2012.AQK
Notification date : 16/03/2012
Last update : 23/03/2012
Notification type : food - border re
Action taken : import not authori
Notification from : ITALY (IT)
Distribution status : no distribution
Product : chilled livers and
Product category : fish and fish proc

Follow-up :

Reference	Follow-up from	Date	Follow-up type	Info
-----------	----------------	------	----------------	------

Hazards :

Substance / Hazard	Category	Analytical result	Units	Sampling date
mercury	heavy metals	1.903	mg/kg - ppm	07/03/2012

Distributed to :

Origin :

| CROATIA |

Rapid Alert System

- EC publishes a weekly summary of the notifications;
- <https://webgate.ec.europa.eu/rasff-window/portal/index.cfm?event=notificationsList>
- In case of import, CA of the country of origin has to make a full investigation and report back to the EU on their results and corrective measures to avoid recurrences

TRACES

TRAdE Control and Expert System (TRACES) 

- TRACES is an integrated web-based veterinary system, established by the Decision 2003/623/EC and maintained by the European Commission 'Health and Consumer Protection Directorate General';
- TRACES notifies, certifies and monitors imports, exports and trade in live animals and animal products;
- TRACES allows to produce and exchange certificates, related to animals, animal products, by-products in 22 official EU languages;
- TRACES publishes the lists of approved establishments, which are authorized to export animal products to the EU

TRACES

- A tool for tracking the movement of animals and products of animal origin from both outside of the EU and within its territory;
- It replaces several systems (ANIMO, SHIFT);
- System avoids redundancy of resources in the EU's 300 BIP's and 1500 local veterinary units;
- TRACES proposes to integrate EU and non EU competent veterinary authorities (*with whom the EC has special agreements*)



TRACES

TRACES allows to create and print accompanying certificates:

- Economic operators can initiate online a health certificate by filling in Part 1 of the certificate for export to the EU, which involves the details of the consignment;
- The non-EU Competent Authority fills in Part II of the health certificate, which is the health attestation of the consignment and either validate or reject the consignment for transportation to the EU Border Inspection Post;

TRACES

- At the EU border, if a health certificate has been validated by a non-EU Competent Authority, the customs agent will use the information from the certificate to initiate Part I of the Common Veterinary Entry Document certificate;
- Once the EU border inspection post completes Part II of the Common Veterinary Entry Document certificate, which is the health attestation of the consignment, the consignment may be rejected or validated for transportation to its final destination within the EU;
- A Common Veterinary Entry Document certificate may also be already inserted and validated in TRACES by a non-EU Competent Authority before the health completion of a certificate

Your Guide

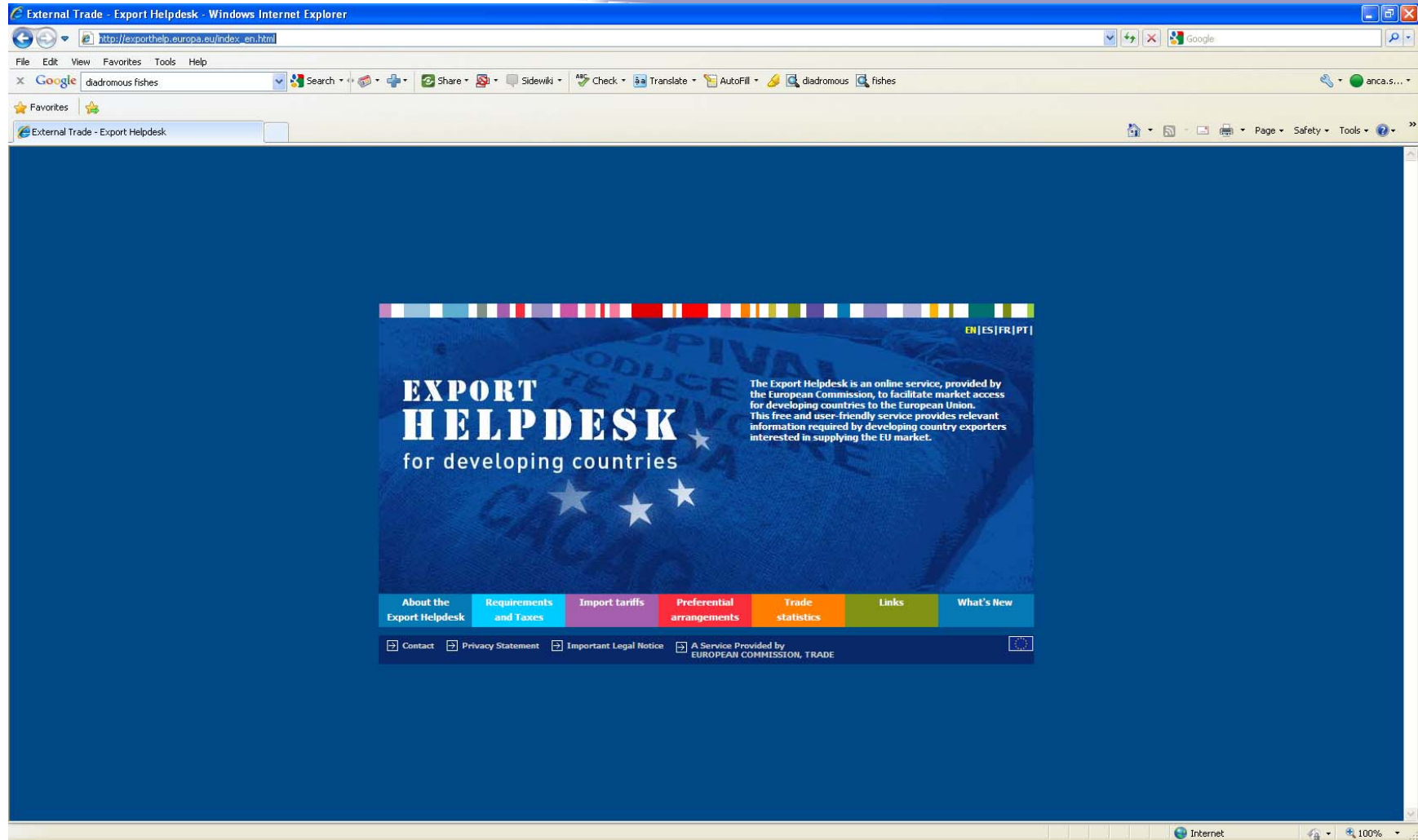


General guidance on EU import and transit rules for live animals and animal products from third countries

<http://ec.europa.eu/food/international/trade/>

http://exporthelp.europa.eu/thdapp/index_en.html

Your Guide



Your Guide

External Trade - Export Helpdesk - Windows Internet Explorer

http://exporthelp.europa.eu/thdapp/taxes/MSServlet?action=output&prodLine=80&simDate=20100801&mode=specificRequirements&taricCode=03021120&partnerId=RJ&reporterId=DK&nomenCmd=View&status=null

diadromous fishes

External Trade - Export Helpdesk

0302 11 --Trout (*Salmo trutta*, *Oncorhynchus mykiss*, *Oncorhynchus clarki*, *Oncorhynchus aguabonita*, *Oncorhynchus glae*, *Oncorhynchus apache* and *Oncorhynchus chrysogaster*)

0302 11 10 ---Of the species *Oncorhynchus apache* or *Oncorhynchus chrysogaster*

0302 11 20 ---Of the species *Oncorhynchus mykiss*, with heads and gills on, gutted, weighing more than 1,2 kg each, or with heads off, gilled and gutted, weighing more than 1 kg each

0302 11 80 ---Other

Specific requirements for 03021120

- Control of residues of veterinary medicines in animals and animal products for human consumption EU/DK
- Control on illegal fishing EU/DK
- Health control of fishery products intended for human consumption EU/DK
- Health control of fishery products not intended for human consumption EU/DK
- Labelling for fishery products EU/DK
- Products from organic production EU/DK

Internal Taxes

VAT	Excise
25%	-

Latest Revision Date (dd/mm/yyyy): 01/07/2010 Latest Revision Date (dd/mm/yyyy): 01/07/2010

Disclaimer.
The information contained in this database shall not be considered as an official source neither from the European Commission nor the Member States' Administrations. Care has been taken to ensure the accuracy of the information contained within the database, but no responsibility can be accepted by the European Commission or the data providers for any inadvertent errors or omissions. Indirect taxes' rates and exemptions are established by the Member States' legislation, therefore full accuracy can only be guaranteed upon consultation of their official sources. By proceeding and viewing the data you are agreeing to these terms.

Overview

Overview of Import Procedures	DK	VAT	DK
		Other	DK

COPYRIGHT

INPUT FORM

Product Code: 03021120
[Browse or Search.](#)

Origin Country: Russian Federation

Destination Country: Denmark

Contact Privacy Statement Important Legal Notice EUROPEAN COMMISSION, TRADE

Internet 100%

Questions?



Contact: Aina Afanasjeva
E-mail: Aina.Afanasjeva@eurofish.dk
Tel: +45 333 777 68