

General requirements for export of fish and fishery products to the EU

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Structure

- General hygiene requirements
- Specific hygiene rules for products of animal origin
- General labelling rules
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- Specific labelling rules for certain fishery products
- Control on illegal fishing
- Your Guide – Export help desk

General hygiene rules

- **DG SANCO** is responsible for food safety in the European Union
- **Food and Veterinary Office** (Ireland) is undertaking inspections in all Member States and exporting countries
- **European Food Safety Authority** (Parma, Italy) provides the EC with independent scientific advice on food safety matters and risks associated with the food chain



General hygiene rules

- Regulation EC/178/2002 lays down the general principles and requirements of food law (General Food Law ec.europa.eu/food/food/foodlaw/index_en.htm):
 - ✓ Lays down procedures in matters of food safety
 - ✓ Establishes common principles and responsibilities (incl. for food and feed business operators at all stages of production, processing and distribution)
 - ✓ Implements the principle of quality management and process-oriented controls throughout the food chain – from the fishing vessel or aquaculture farm to the consumer's table



General hygiene rules

- The Food Law 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
- 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

General hygiene rules

- 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, including 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

General hygiene rules

- Regulation **EC/178/2002** lays down that:
 - Food imported into the Community is to comply with the general requirements laid down in this Regulation or to satisfy rules that are equivalent to Community rules
 - Establishes the European Food Safety Authority
 - Establishes a Rapid Alert System for the notification of a direct or indirect risk to human health deriving from food or feed



General hygiene rules

Rules for the hygiene and controls of foodstuffs, including aquaculture animals and their products intended for human consumption, are laid down in:

Regulation 852/2004

- On the hygiene of foodstuffs;

Regulation 853/2004

- Specific hygiene rules for food of animal origin (incl. Requirements on the structure of vessels, factory and freezer vessels, landing sites, processing establishments and on operational processes, storage and transport of fishery products, production areas of live bivalve molluscs);

Regulation 854/2004

- Specific rules for the organisation of official controls on products of animal origin intended for human consumption (incl. Rules for official controls of production and placing on the market of fishery products, requirements for certificates accompanying imports)

General hygiene rules



- **Regulation 852/2004** On the hygiene of foodstuffs:
 - ✓ Lays down general rules for food business operators
 - ✓ This regulation does not apply to primary production for private domestic use, domestic preparation, handling and storage of food for private domestic consumption, the direct supply by the producer, of small quantities of primary products to the final consumer
 - ✓ Requires implementation of procedures based on the HACCP principles
 - ✓ HACCP principles apply only to food business operators carrying out any stage of production, processing and distribution of food after primary production
 - ✓ Hygiene provisions for primary production are described in Annex I and general hygiene requirements for all food business operators in Annex II

General hygiene rules

- Regulation **852/2004** On the hygiene of foodstuffs requires that food business operators adopt the following hygiene measures:
 - Compliance with microbiological criteria,
 - Compliance with temperature control requirements,
 - Maintenance of the cold chain,
 - Sampling and analysis,
 - Ensure that the CA always has up-to-date information on establishments, including any significant change in activities and any closure of an existing establishment



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,
- General and specific requirements,
- Hazard analysis and critical control points,
- Official control, registration and approval

Specific hygiene rules for products of animal origin

- **Regulation 853/2004** lays down specific rules on the hygiene of food of animal origin for food business operators. These rules supplement those laid down by Regulation (EC) No 852/2004. They shall apply to unprocessed and processed products of animal origin
- The Regulation does not apply to primary production for private domestic use, domestic preparation, handling and storage of food for private domestic consumption, the direct supply, by the producer, of small quantities of primary products to the final consumer
- Regulation does not apply to retail sector (i.e., handling and/or processing of food and its storage at the point of sale)
- Annex II specifies requirements concerning identification marking, indicating the approval number of establishment where operations take place, country in which the establishment is located
- Annex III specifies specific requirements for products of animal origin, including live bivalve molluscs and fishery products

Specific hygiene rules for products of animal origin



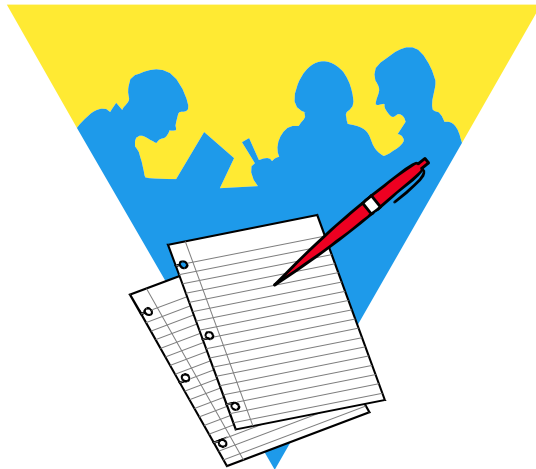
- **Regulation 853/2004** requires that:

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)

Specific hygiene rules for products of animal origin



- CA provides the EC with a list of approved establishments;
- CA guarantees companies' continued compliance with EU requirements;
- CA is checked by the Food and Veterinary Office to see if they are doing the job

Specific hygiene rules for products of animal origin

- Regulation **853/2004** defines that import of animal origin products takes place only if:
 - The third country of dispatch appears on a list of third countries from which imports of that product are permitted
 - The establishments from which that product was dispatched, and in which it was obtained or prepared, appears on a list of establishments from which imports of that product are permitted
(https://webgate.ec.europa.eu/sanco/traces/output/FFP_HR_en.pdf)
 - In the case of live bivalve molluscs, echinoderms, tunicates and marine gastropods, the production area appears on a list

EC Decision 2006/766/EC – imports of bivalve molluscs and fishery products

EC Decision 2011/163/EU – imports of aquaculture products

Specific hygiene rules for products of animal origin

- Regulation **853/2004** defines that food business operators importing products of animal origin shall ensure that:
 - Products are made available for control upon importation in accordance with Directive 97/78 governing the principles of organisation of veterinary checks on products entering the Community from third countries
 - Importation complies with the requirements of Directive 2002/99/EC laying down the animal health rules governing the production, processing, distribution and introduction of products of animal origin for human consumption

General labelling rules

- The objective of foodstuff labelling is:
 - To guarantee that consumers have access to complete information on the content and composition of products;
 - To provide details on a particular aspect of the product, such as its origin or production method;
 - Some foodstuffs, such as genetically modified organisms, foods intended for infants are also subject to specific regulations;
 - Fishery products are subject to the general labelling rules for foodstuffs, as well as general labelling rules for fishery products and specific labelling rules for certain fishery products subject to harmonised marketing standards

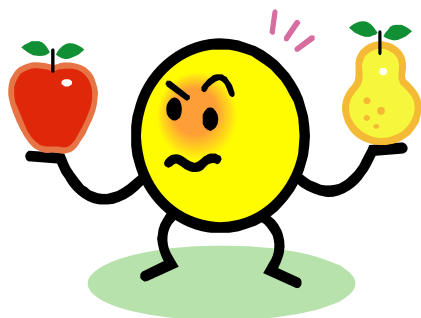
General labelling rules

- Directive 2000/13 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs:
 - The Directive applies to pre-packaged foodstuffs to be delivered to the final consumer;
 - It does not apply to products intended for export outside the Community



General labelling rules

- In accordance with general rules for foodstuffs the labelling must include the following:
 - Name under which the product is sold;
 - List of ingredients;
 - The quantity of certain ingredients or categories of ingredients expressed as a percentage;
 - The net weight;
 - The date of minimum durability or “best before”, or “the use by” date;
 - Any special storage conditions or conditions of use;
 - The name or business name and address of the manufacturer or packager;
 - Lot marking



General labelling rules for fishery products

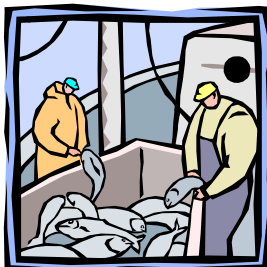
- Regulation 2065/2001- rules for the application of Regulation 104/2000 regarding informing consumers about fishery and aquaculture products:
 - Commercial and scientific name (<http://fishbase.sinica.edu.tw/search.php>);
 - Production method (caught at sea or in freshwater, or produced in aquaculture);
 - Catch area (FAO fishing area (caught at sea), reference to the country of origin (caught in freshwater), reference to the country in which the product is farmed (aquaculture));
 - Information must be provided on the labelling or packaging, or by means of a commercial document accompanying the goods (such as an invoice)

Specific labelling rules for certain fishery products

- Regulation 2406/96 on marketing standards for certain fishery products
 - Lots must contain products of the same size and uniform freshness;
 - The freshness category, size category and presentation must be clearly and indelible marked, in characters of at least 5 cm high, on labels affixed to the lot;
 - The information provided by labels must be easy to understand, easily visible, clearly legible and indelible and must appear in the official language of the MS where the product is marketed;
 - Country of origin in Roman letters at least 20 mm high;
 - Date of grading and date of dispatch;
 - Name and address of consignor

Control on illegal fishing

- From 1 January 2010 fish and fishery products shall only be imported into EU when accompanied by a **catch certificate** (Regulation 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated (IUU) fishing);
- Catch certificate should be submitted by the importer to the competent authorities of the MS in which the product is intended to be imported;
- Landing or transshipment operations by third country fishing vessels shall be authorised only in designated ports



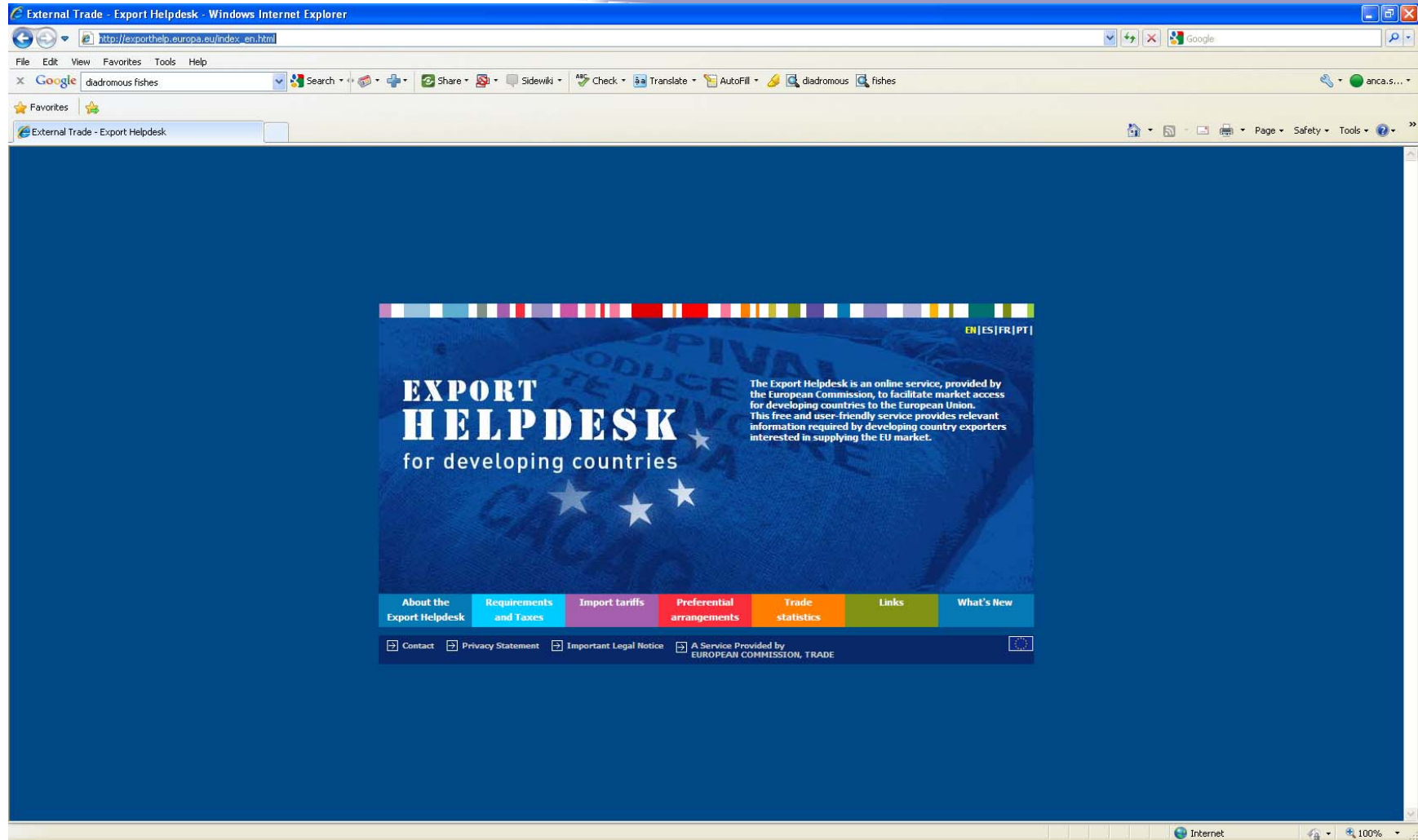
Your Guide

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 - *continued*

External Trade - Export Helpdesk - Windows Internet Explorer

http://exporthelp.europa.eu/thdapp/taxes/MSServlet?action=output&prodLine=808&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

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Overview

Overview of Import Procedures	DK	VAT	DK
		Other	DK

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INPUT FORM

Product Code: 03021120
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Origin Country: Russian Federation

Destination Country: Denmark

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Internet 100%



Questions?

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