

# **Health conditions and trade in fishery products**

## 1 Introduction

The fishery sector is considered to be of disproportionate importance to the economies of many less developed countries, where production and commercialisation of fishery products may contribute an important source of animal protein, employment and export revenues.

However interventions which support the trade in fishery products derived from ACP countries can only be justified if that trade is both:

- Substantive enough to provides sustainable benefits to significant numbers of people of those countries
- Based on a sustainable utilisation of resources

## 2 Importance of fishery product trade in ACP countries

### 2.1 *General importance of fishery product trade to ACP countries*

Out of 77 ACP countries which are signatories to the Lome Convention, some 60 either have supplied fish to the EU in recent history (since 1995) or have expressed an interest in doing so (as indicated by approaches to the Commission Services for information on the sanitary control requirements).

Table 1 below shows the level of production and trade in fishery products from these 60 ACP countries in 1997<sup>1</sup>.

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<sup>1</sup> 1997 was the last full year in which third countries could supply EU Member states under bilateral arrangements, without meeting the specific requirements of Directive 91/493/EEC. This year therefore provides the latest view of "normal" ACP fish trade patterns without the influence of the EU sanitary controls, and is used as the basis of this analysis.

	1	2	3	4	5	6	7	8	9	10	11	12	
	1997 Fish Production	1997 Fish Export (All)		1997 Fish Exports (EU)		1997 Fish Exports All (Corrected*)		Fish production (Corrected*)	All exports	Dependency			
Country	tonnes	tonnes	1000 ECU	tonnes	1000 ECU	tonnes	1000 ECU	tonnes	1000 ECU	% fish production exported	% fish in total exports	% fish exports destined to EU	Status of EU Approval
Senegal	507066	112152	259898	54665	190351	112152	259898	507066	820490	22	32	73	List 1
Cote d'Ivoire	24213	94	1788	52537	179212	52537	179212	52537	3788758	100	5	100	List 1
Namibia	280335	210688	216843	63627	131601	210688	216843	280335	1217588	75	18	61	List 1
Ghana	446788	60351	62704	34891	88583	60351	88583	446788	1482321	14	6	100	List 1
Madagascar	117547	16120	70170	18985	79452	18985	79452	117547	202176	16	39	100	List 1
Mauritania	84000	42932	121878	24188	72902	42932	121878	84000	475975	51	26	60	List 1
Seychelles	5344	31360	62247	18372	63199	31360	63199	31360	103354	100	61	100	List 1
Mozambique	42056	10367	77425	7266	58896	10367	77425	42056	181324	25	43	76	List 2
Kenya	161203	17465	47422	12813	45048	17465	47422	161203	1862194	11	3	95	List 2
Nigeria	365735	4301	12562	8165	41077	8165	41077	365735	13792384	2	0	100	List 1
Tanzania	1038190	1005	1161	10612	37996	10612	37996	1038190	651859	1	6	100	List 1
Mauritius	13734	15912	41175	13136	37629	15912	41175	15912	1443336	100	3	91	List 1
Angola	136058	3680	8407	8639	31992	8639	31992	136058	3769719	6	1	100	List 2
Uganda	218026	9839	26111	8355	31953	9839	31953	218026	503173	5	6	100	List 2
Sierra Leone	68772	13593	28852	12760	28900	13593	28900	68772	15413	20	188	100	Last communication 01/00. Insufficient
Bahamas	10508	2603	55996	836	21148	2603	55996	10508	164098	25	34	38	List 2
Solomon Islands	62373	39138	43719	6923	19377	39138	43719	62373	158658	63	28	44	List 2
Belize	1223	1482	16260	12195	15986	12195	16260	12195	144152	100	11	98	List 2
Guinea	62441	9652	22071	7721	15211	9652	22071	62441	854941	15	3	69	Application 11/98. Guarantees requested.
Somalia	15700	5075	9917	5071	10701	5075	10701	15700	161378	32	7	100	
Fiji	17941	0	0	3302	9393	3302	9393	17941	562103	18	2	100	List 2
Guinea Bissau	62441	9652	22071	4800	9238	9652	22071	62441	43518	15	51	42	Application rec'd 04/99. Awaiting documents and guarantees
Gabon	44715	1476	7653	1279	7284	1476	7653	44715	2819583	3	0	95	List 2
Jamaica	8358	2814	13450	1480	6579	2814	13450	8358	1253853	34	1	49	List 2
Surinam	47010	95	150	1742	6025	1742	6025	47010	635539	4	1	100	List 2
Cameroon	94000	669	1263	1165	4929	1165	4929	94000	1686310	1	0	100	List 2
Gambia	32254	1747	3473	1289	4404	1747	4404	32254	13599	5	32	100	List 1
St. Vincent	3571	5075	9917	2319	4124	5075	9917	5075	41704	100	24	42	List 2
Vanuatu	30754	240	1146	3004	3714	3004	3714	30754	31732	10	12	100	Application 06/98. Insufficient.
Togo	14290	1914	9485	568	2497	1914	9485	14290	384406	13	2	26	List 2
Congo Brazzaville	12500	432	902	542	2493	542	2493	12500	1512239	4	0	100	Application rec'd 12/99. Insufficient.
Trinidad & Tobago	2739	973	2800	706	2279	973	2800	2739	2304624	36	0	81	Application 04/99. Awaiting guarantees.
Sao Tome	7134	1798	4231	857	2108	1798	4231	7134	4533	25	93	50	Latest application 6/99. Insufficient.
Cape Verde	11057	552	1935	411	1415	552	1935	11057	9066	5	21	73	Removed from List 2, April 2000
Benin	43771	202	1232	210	1330	210	1330	43771	384406	0	0	100	List 2
Grenada	1408	840	3892	157	626	840	3892	1408	20852	60	19	16	List 2
Antigua & Barbuda	360	3680	8407	71	584	3680	8407	3680	11786	100	71	7	List 2 (fresh fish only)
Papua New Guinea	44060	2274	11159	202	493	2274	11159	44060	1961015	5	1	4	List 2
Haiti	5324	1179	10031	81	470	1179	10031	5324	108794	22	9	5	Application 12/98. Insufficient.

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Country	tonnes	tonnes	1000 ECU	tonnes	1000 ECU	tonnes	1000 ECU	tonnes	1000 ECU	% fish production exported	% fish in total exports	% fish exports destined to EU	Status of EU Approval
DR Congo (Zaire)	112834	240	1146	45	426	240	1146	112834	31732	0	4	37	No application rec'd
Eritrea	978	83	264	83	236	83	264	978	n/a	8	n/a	89	List 2
Niger	6328	52	291	39	233	52	291	6328	246600	1	0	80	
Malawi	56340	8	272	6	220	8	272	56340	486854	0	0	81	
Burundi	20296	41	223	40	198	41	223	20296	78876	0	0	89	
Guyana	53998	5678	25648	26	159	5678	25648	53998	583862	11	4	1	Latest application 10/99. Insufficient.
Zambia	65902	318	454	6	158	318	454	65902	829556	0	0	35	Application 08/98. Live fish only approved.
Ethiopia	10370	26	152	26	128	26	152	10370	532185	0	0	84	
Djibouti	340	25	73	25	69	25	73	340	130553	7	0	95	Dossier rec'd 07/98. Insufficient
Sudan	47010	95	150	34	62	95	150	47010	538531	0	0	41	
Tuvalu	400	123	324	22	55	123	324	400	181	31	179	17	
Zimbabwe	18056	1628	3340	13	45	1628	3340	18056	2233908	9	0	1	List 2
Comoros	12500	432	902	23	38	432	902	12500	9973	3	9	4	
Barbados	2764	260	1363	8	37	260	1363	2764	256573	9	1	3	Application rec'd 06/98. Guarantees requested
Dominican Rep.	1000	25	73	2	28	25	73	1000	799637	3	0	39	Application rec'd 06/98. Guarantees requested
Tonga	2739	973	2800	3	24	973	2800	2739	9973	36	28	1	
Central African Rep.	265	552	1935	11	21	552	1935	552	139619	100	1	1	No application rec'd.
Equatorial Guinea	6090	282	1029	0	8	282	1029	6090	450589	5	0	1	
Mali	99550	203	416	0	7	203	416	99550	508613	0	0	2	
Dominica	1000	25	73	0	4	25	73	1000	48051	3	0	6	No application rec'd.
Swaziland	65	1005	1161	0	1	1005	1161	1005	820490	100	0	0	
TOTALS	4663824	655495	1341886673	406354	1273356	748273	1675156	4737365	54319311	16	3	76	
Sources:	FAO Fishstat	FAO Fishstat	FAO Fishstat	Eurostat	Eurostat	Greater of Eurostat or FAO Fishstat (if EU Exports > Total export)		Greater of exports or production	UNCTAD				

Note: no fish trade data available for Burkina Faso, Liberia, St. Kitts and Nevis, or Tristan da Cunha

**Table 1 : Level of Production and Trade in Fisheries products from 56 ACP countries in 1997**

On a general level, fish production in ACP countries was 4.7 million tonnes in 1997 (source FAO Fishstat). Of this, some 700,000 tonnes entered international trade (approximately 14%), gaining gross export revenues of over €1.3 billion for the ACP group. The majority of this revenue (76%) was derived from trade with the European Union. The main product categories by value are frozen tuna for canning, canned tuna and frozen shrimp.

## **2.2 Potential benefits to ACP countries of trade in fishery products**

Benefits of developing an export trade in fishery products which meet international health and sanitary regulations, can be summarised as follows:

- Improved incomes and employment in export fish processing and distribution
- Improved incomes and security of employment in fishing
- Higher levels of foreign exchange revenues and national tax income
- Improved quality and safety of fishery products for the national market

However, not all ACP countries are in a position to gain these benefits. Trade in fishery products is of disproportionate importance in some ACP countries. Three measures of dependence on trade in fishery products are proposed as a means of assessing potential impact of trade in fishery products. These are:

<b>Measure</b>	<b>Potential impact</b>
Proportion of fish production which is exported	The fishery sector, or parts of it, are substantially dependent on export revenues for employment and incomes in fishing and processing.
Proportion of export revenues derived from fish	Fish exports are of national strategic importance for balance of trade
Proportion of revenues derived from exported fishery products that are due to exports to the EU	The EU is a market of strategic importance for the fish export trade

**Table 2: Three measures of dependence on trade in fishery products**

Columns 10,11 and 12 of Table 1 provide a measure of these indicators of national dependency on exports of fishery products.

## **2.3 Importance of ACP fishery product trade for individual ACP countries**

The following countries' fishery sectors are those where over 50% of fish production is exported. They can be said to be substantially dependent on exports of fishery products for the existence of important fleet and processing segments. Note that the

actual size of sector is quite small in some cases. The most significant producers in this category are Namibia, Solomon Islands, Cote d'Ivoire, Mauritania and Seychelles. Note that frozen tuna for canning, and canned tuna are the most significant products exported by the main producers in this category of exporter. In many of these countries it is often the case that major segments of the industry only exist for the export market.

ACP Country	Fish production (tonnes)	Proportion of production exported (%)
Cote d'Ivoire	52,537	100
Seychelles	31,360	100
Mauritius	12,195	100
Belize	15,912	100
St. Vincent	5,075	100
Antigua & Barbuda	3,680	100
Central African Rep.	552	100
Swaziland	1,005	100
Namibia	280,335	75
Solomon Islands	62,373	63
Grenada	1,408	60
Mauritania	84,000	51

*Note that high levels of dependence (100%) can be due to disparities between FAO production data and Eurostat import data.*

**Table 3: Significant Fish producers**

A second group of countries is comprised of those which are substantially dependent on fishery products for export revenues, with fish featuring as one of the most significant export commodities (where over 20% of the value of all exports is derived from trade in fishery products). These are shown in Table 4.

ACP Country	Exports of fishery products (tonnes)	% of fish in total exports
Sierra Leone	13,593	188
Tuvalu	123	179
São Tome	1,798	93
Antigua & Barbuda	3,680	71
Seychelles	31,360	61
Guinea Bissau	9,652	51
Mozambique	10,367	43
Madagascar	18,985	39
Bahamas	2,603	34
Gambia	1,747	32
Senegal	112,152	32
Tonga	973	28
Solomon Islands	39,138	28
Mauritania	42,932	26
St. Vincent	5,075	24
Cape Verde	552	21
<i>Note that disparities between UNCTAD trade data and EU Eurostat import statistics give rise to dependency rates &gt;100%</i>		

**Table 4 : Substantially dependent Fish producers**

This group of exporters have few alternatives for generation of foreign revenue, apart from trade in fishery products. Even if the volume of production is relatively small, support for this trade is likely to have a significant impact at a national level.

Finally, as noted earlier, ACP exporters of fish are substantially dependent on the European market, with only 24% of exports to non-EU destinations (principally the USA and Japan). However, this pattern is distorted by the trade patterns of some of the major producers such as Cote d'Ivoire and Seychelles, which trade almost exclusively with the EU. Many of the smaller exporting nations have a more diversified export market profile for their fishery products. A good example might be Solomon Islands, which also has substantial trade with Australia and the USA.

Despite this tendency for a greater diversification, for at least forty three of the ACP countries which export fish, the EU is their most important market (with over 50% of exports of fishery products by value sent to this destination). The EU is an important market (importing some 4.3 million tonnes of fishery products in 1999) and clearly must figure as an important target for any serious fish exporting nation.

## 2.4 Potential beneficiaries of donor support for sanitary controls in fish trade

Development of a modern system of sanitary controls for food products is an expensive and time consuming business. For both Member States and third country suppliers it demands a co-ordinated application of legal, institutional, human and technical resources to respond to the varied requirements of European Directives and Regulations.

Many countries possess only a small fisheries sector with limited production and export potential. They cannot be expected to derive significant, direct benefits in the short or medium terms (in terms of income and employment) from further development of fish trade with the EU, and resources for the introduction of improved health controls would be better allocated to other areas of development.

It is suggested that dependency on fishery product exports can be defined by the following criteria:

Criterion	Measure
Export oriented fishery sector	More than 50% of fish production is directed towards exports
Fishery product exports of national strategic importance	Fishery products comprise more than 20% of total exports

Some of the smaller countries which meet these criteria have a total annual production of relatively small quantity of fishery products. The development of a substantial health control system cannot be considered viable for Swaziland (1005 tonnes), Central African Republic (552 tonnes), Tuvalu (400 tonnes), all of which fall into this category. After exclusion of these countries, the criteria provide an indicative list of 20 less developed countries dependent on fish trade.

1. Antigua & Barbuda	11. Mauritius
2. Bahamas	12. Mozambique
3. Belize	13. Namibia
4. Cape Verde	14. Sao Tome & Principe
5. Cote d'Ivoire	15. Senegal
6. Gambia	16. Seychelles
7. Grenada	17. Sierra Leone
8. Guinea Bissau	18. Solomon Islands
9. Madagascar	19. St. Vincent & Grenadines
10. Mauritania	20. Tonga

**Table 5 : 20 potential beneficiaries**

Note that this analysis only considers national dependency levels. Many countries have region within their borders which may also be considered to be dependent on fishery product exports eg. Uganda, Tanzania and Kenya. The analysis is also

historical (based on fish exports in 1997). Several countries with good export potential do not appear as dependent, since they only had low levels of exports in 1997. Angola is a case in point.

### **3 Fish health controls**

Within the European Union, health controls for fishery products relate to two main areas of concern. The basic health and hygiene provisions are defined under Council Directive 91/493/EEC relating to "Health conditions for the production and placing on the market of fishery products for human consumption".

Additional specific requirements are imposed for control of residues of veterinary medicines in aquaculture products by Directive 96/23/EC "On measures to monitor certain substances and residues thereof in live animals and animal products". Both of these Directives are applied to third country suppliers of fishery products, where third countries are required to implement systems which are "at least equivalent" to those defined in the Directives.

In relation to Directive 91/493/EEC the present status of health controls for exported fishery products in ACP countries may be determined from two main sources. Modified lists (Part I and Part II) of approved countries were published in the Commission's Decision 2001/635/EC (OJ L 221 of 17.08.01) "*Amending Decision 97/296/EC drawing up the list of third countries from which the import of fishery products is authorised for human consumption*".

Secondly, the Commission publishes the reports detailing the results of inspections made by inspectors of the Commission Services. These reports provide a more detailed technical insight into the nature of compliance problems experienced by ACP countries.

In relation to the monitoring of residues of veterinary medicines, the Commission Services are in the process of implementing the application of the controls defined in 96/23/EC to third countries. All third country suppliers of farmed animal products (including aquaculture products) have been required to submit a Residue Monitoring Programme (RMP) in accordance with the Directive. Decision 2000/159/EC contains the list of third countries and products, for which acceptable monitoring plans have been submitted. The Commission Services are currently in the process of amending this decision, to exclude all countries and products for which no adequate RMP has been submitted to the Commission.

#### **3.1 Present status of ACP suppliers of fishery products in respect of Directive 91/493/EEC**

##### **3.1.1 List I**

List I comprises of countries and territories covered by a specific decision under Council Directive 91/493/EEC (comprising those countries which have been

approved following an inspection by the Commission Services). ACP/OCT countries on List I in October 2001 are:

**Part I.** Countries and territories covered by a specific decision under Council Directive 91/493/EEC

CI- CÔTE D'IVOIRE  
FK- FALKLAND ISLANDS  
GH- GHANA  
GM- GAMBIA  
GN- GUINEA CONAKRY  
JM- JAMAICA  
MG- MADAGASCAR  
MR- MAURITANIA  
MU- MAURITIUS  
NA- NAMIBIA  
NG- NIGERIA  
SC- SEYCHELLES  
SN- SENEGAL  
TZ- TANZANIA  
UG- UGANDA  
ZA- SOUTH AFRICA

3.1.2 List II

List II comprises countries and territories meeting the terms of Article 2(2) of Council Decision 95/408/EC (comprising those countries which have submitted satisfactory dossiers, pending an inspection by the Commission Services). Note that some countries have received inspections, and will remain on List II pending the receipt of satisfactory guarantees that certain observed deficiencies have been rectified. ACP countries on List II are:

**Part II.** Countries and territories meeting the terms of Article 2(2) of Council Decision 95/408/EC

AG- ANTIGUA and BARBUDA(1)  
AN- NETHERLANDS ANTILLES  
AO- ANGOLA  
BJ- BENIN  
BS- BAHAMAS  
BZ- BELIZE  
CG- REPUBLIC OF CONGO(3)  
CM- CAMEROON  
ER- ERITREA  
FJ- FIJI  
GA- GABON  
GD- GRENADA  
GL- GREENLAND  
KE- KENYA

MZ- MOZAMBIQUE  
NC- NEW CALEDONIA  
PF- FRENCH POLYNESIA  
PG- PAPUA NEW GUINEA  
PM- ST PIERRE and MIQUELON  
SB- SOLOMON ISLANDS  
SH- ST HELENA  
SR- SURINAME  
TG- TOGO  
YT- MAYOTTE(5)  
ZW- ZIMBABWE

- (1) Authorised only for imports of fresh fish.
- (2) Authorised only for imports of caviar.
- (3) Authorised only for imports of fishery products caught, frozen and packed in their final packaging at sea.
- (4) Authorised only for import of live animals intended for direct human consumption.
- (5) Authorised only for imports of non-processed and non-prepared fresh aquaculture products."

### 3.1.3 Countries and territories not Listed

Several countries have not submitted as satisfactory dossier to enable entry to List 2 (pending inspection). Others may have been on List 2, but have been removed as a result of an unsatisfactory inspection. None of the following ACP countries are permitted to supply the EU with fishery products.

### 3.1.4 Dossiers insufficient or awaiting guarantees

1. Sierra Leone
2. Guinea
3. Guinea Bissau
4. Vanuatu
5. Congo Brazzaville
6. Trinidad and Tobago
7. Sao Tome and Principe
8. Haiti
9. Guyana
10. Djibouti
11. Barbados
12. Dominican Republic
13. Central African Republic
14. Dominica
15. Burkina Faso
16. Liberia
17. St.Kitts and Nevis
18. Tristan da Cunha

### 3.1.5 Unsatisfactory inspection reports

1. Cape Verde (removed from List 2 April 2000)
2. St.Lucia
3. St.Vincent and Grenadines

## **4 Present status of ACP suppliers of aquaculture products in respect of Directive 96/23/EC**

On 20 December 2000, the Commission is modified Decision 2000/159/EC which lists those countries which are permitted to supply farmed products of animal origin to the EU, and the permitted species/animals.

The following ACP countries have submitted a Residue Monitoring Plan for aquaculture products, which has been accepted by the Commission . These countries are permitted to continue supplying the EU with aquaculture products.

1. Jamaica
2. Madagascar
3. Mauritius
4. Namibia
5. New Caledonia
6. Seychelles
7. South Africa
8. Zimbabwe

The following ACP countries have not submitted a RMP for any products of animal origin and these countries will not be permitted to supply any farmed meat or fishery products to the EU.

1. Antigua & Barbuda
2. Angola
3. Benin
4. Bahamas
5. Belize
6. Cote d'Ivoire
7. Camaroon
8. Cape Verde
9. Eritrea
10. Ethiopia
11. Fiji
12. Gabon
13. Grenada
14. Ghana
15. Gambia
16. Guinea
17. Kenya

18. Mauritania
19. Mozambique
20. Nigeria
21. French Polynesia
22. Papua New Guinea
23. Solomon Islands
24. St.Helena
25. Senegal
26. Suriname
27. Togo
28. Tanzania
29. Uganda
30. St.Vincent & Grenadines

It should be noted that in the list of countries whose access to the EU market for aquaculture products will be lost are some substantial producers of aquaculture products (and in particular shrimp). These include Belize and Mozambique.

It should also be mentioned that EU market access for wild caught products of the same species as aquaculture products may be threatened by this measure. For example an EU border inspection post may detect a residue problem in respect of farmed shrimp. If the aquaculture product cannot be differentiated at the border inspection from the wild caught product (by labelling or by reason of being a different species) then any rapid alert or subsequent import ban could relate to all shrimp. Such a situation might be extended until the Competent Authority could guarantee a satisfactory control of labelling and separation of product from capture and aquaculture production systems.

## **5 Inspections by Commission Services**

Up to December 2000, the inspectors of the Commission Services, had undertaken and published reports on sanitary controls for fishery products in 22 ACP countries. These reports were reviewed, and the main results and outcome of each inspection is listed in the Table overleaf. It is apparent from this table that ACP countries experience a wide range of problems in meeting the EU requirements for sanitary controls for fishery products.

It should be noted that both Jamaica and Namibia, which received critical reports described in the Table, have since addressed the deficiencies identified and have progressed to List 1. St.Vincent and Grenadines has been delisted as a result of the unfavourable inspection report.

Country	Inspection	Immediate Outcome	Main problems
1. Bahamas	April 1999	Remain on List II	Lack of inspection skills No inspection reports No laboratory testing to support inspections Unsatisfactory HACCP implementation Establishments do not comply with 91/493/EC
2. Belize	March 2000	Remain on List II	Legal responsibility for sanitary controls of fishery products not allocated to Competent Authority Legislation inadequate (approval and approval conditions) No approval procedures defined No residue monitoring programme for aquaculture products Weak reporting of inspections; reports not communicated to establishment Unsatisfactory HACCP implementation Certificate does not conform with 95/328 Belize flagged vessels not registered for sanitary controls, and not inspected
3. Cameroon	March 2000	Request guarantees pending moving to List I	Poor controls over re-processing for export of imported fishery products Insufficient inspection staff Water quality standards not defined No official laboratories nominated Establishments and freezer vessels do not comply with 91/493/EEC No residue monitoring programme defined or implemented
4. Cape Verde	December 1999	Removed from List II	Competent Authority non-existent Official inspection service not aware of, or not implementing EU requirements No legal/written basis for inspection and approval No evidence of routing inspection No implementation of HACCP system Establishments do not comply with 91/493/EEC Health certificates issued without authority Lack of inspection skills No residue monitoring system No laboratory testing performed Issue of export certificates not supervised

Country	Inspection	Immediate Outcome	Main problems
5. Gabon	February 2000	Remain on List II	No written procedures for inspection and approval Legislation not yet implemented No residue monitoring system No laboratory testing performed Inadequate control and inspection of individual freezer vessels Cold stores do not comply with 91/493/EEC Issue of export certificates not supervised
6. Grenada	February 2000	Remain on List II	Unitary Competent Authority not defined Dual inspections by Health and Fisheries officials Legislation on approval and inspection system not enacted or implemented No sampling and laboratory testing undertaken in support of inspections No residue monitoring programme in place Establishments approved which do not comply with 91/493/EEC Security of health certificates not adequately controlled HACCP system not implemented and not audited by Competent Authority
7. Jamaica	April 2000	Remain on List II	No inspection reports Lack of control system for gastropod molluscs (toxic phytoplankton) Insufficient laboratory facilities for microbiological testing Weak implementation of HACCP system Establishments do not comply (water testing, pest control and general conditions)
8. Kenya	November 1998	Remain on List II	Weak inspection of HACCP system No monitoring programme for pesticides and other residues Poor identification and traceability Laboratory testing facilities inadequate Poor hygienic conditions at landing sites Inadequate medical checks on personnel
9. Kenya (pesticide residues)	August 1999	Maintain ban on import of fishery products	Lack of detailed and written procedures for residue monitoring. Weak sample security in transportation Water, sediment and fish not sampled in accordance with residue monitoring plan Lack of written analytical procedures for laboratory staff Some analyses undertaken in inadequate laboratories

Country	Inspection	Immediate Outcome	Main problems
10. Mozambique	November 1998	Request guarantees pending moving to List I	Legislation defining approval system not published and implemented No legislation on water supply safety Weak monitoring of HACCP systems by inspectors Provisional approval granted to non-complying enterprises and freezer vessels Inadequate medical checks on food handlers No residue monitoring programme No list of poisonous fish
11. Namibia	October 1999	Request guarantees pending moving to List I	Some certificates issued in S.Africa out of control of the Competent Authority Incorrect method used for histamine analysis Minor deficiencies in hygiene and HACCP implementation Inadequate checks on parasites
12. Nigeria	February 1998	Request guarantees pending moving to List I	Duplication of inspection activities by Ministries of Health and Agriculture Laboratory management and control weak, especially with respect to EN45001 HACCP systems implemented by lacked correct identification of CCPs
13. Saint Lucia	March 1999	Remove from List 2	Duplication of inspection activities Approval conditions not defined No legislation on water supply safety No laboratory analysis in support of sanitary controls No implementation of HACCP system Establishments do not comply with 91/493/EEC (water testing, pest control and general conditions) No identification marks applied to fishery products No monitoring programme for biotoxins and heavy metals No list of poisonous fish
14. St.Vincent and Grenadines	February 2000	Remove from list II pending receipt of guarantees	Duplication of inspection activities Powers and duties of Competent Authority not clearly defined Approval conditions not clearly defined Legislation does not meet EU requirements for hygiene, HACCP or water safety Poorly developed laboratory support for sanitary controls for fishery products in establishments No monitoring programme for biotoxins and heavy metals Certificate security insufficient

Country	Inspection	Immediate Outcome	Main problems
15. Senegal (due to high level of alerts)	November 1999	Remain on List I pending receipt of guarantees	No legislation relating to controls of heavy metals, pesticides and biotoxins No inter-calibration of laboratory network No written system for suspending exports from establishments and/or regions Inspection programme and record keeping insufficient Potable water standards not compatible with those of the EU
16. Seychelles	August 1998	Inclusion in List I	Insufficient number of field inspectors Not all inspections documented No written inspection programme or documented procedures Inspection frequency of remote establishments too low No residue monitoring programme in place HACCP plans not officially approved In-plant laboratories not officially approved Use of EU certificate for non-EU exports
17. Solomon Islands	July 1998	Approval of one cannery and 4 vessels, subject to guarantees	Some areas of non-critical non-compliance with 91/493 in cannery and vessels
18. Tanzania (due to concern over pesticide residues)	August 1999	Maintain ban on imports until adequate RMP in place	Monitoring of pesticide (and heavy metal) residues unsatisfactory Lack of written sampling and monitoring programme No official laboratory appointed with capacity for analysis of pesticide residues Lack of laboratory quality assurance procedures Sampling undertaken by staff from establishments Lack of documentation on sampling and test results
19. Togo	February 2000	Remain on List II	Insufficient skilled staff resources for field inspections Legislation not equivalent to EU in the area of controls for water safety, parasites, contaminants, microbiological monitoring and some hygiene conditions No laboratory testing in support of sanitary controls for fishery products Laboratory test methods inadequate No laboratory quality assurance procedures Approval of non-compliant establishments and vessels No written recording of inspection results, or defined follow up procedures Poor security of health certificates No monitoring of water safety parameters Numerous areas of non-compliance in establishments and freezer vessels

<b>Country</b>	<b>Inspection</b>	<b>Immediate Outcome</b>	<b>Main problems</b>
20. Uganda (due to concern over pesticide residues)	August 1999	Consider removal from List II subject to import checks	Lack of detail in sampling plan documents Poor sample security Only 2 pesticides monitored on a systematic basis Deficient analytical methods and laboratory management and quality assurance in national laboratories
21. Zimbabwe (assessment of residue monitoring programme)	November 1999		No monitoring provisions clearly specified for fishery products Only organo-chlorine compounds monitored in fishery products One of nominated laboratories failed to meet standards for management, quality assurance, analytical capacity and service and no inter-laboratory comparisons.
22. Papua New Guinea	June 2000	Remain on List II pending guarantees	Legislation adequate but not gazetted No laboratory testing in support of sanitary controls for fishery products Approval of non-compliant establishments and vessels (HACCP, hygiene and structural deficiencies) No written recording of inspection results, or defined follow up procedures No residue monitoring

## **6 Summary of problems faced by ACP suppliers**

Typical problems which ACP countries experience in the implementation of health controls are described in the box overleaf.

**Typical problems experienced by ACP Countries in health controls for fishery products**

**Legal and organisational**

Competent authority non-existent or not defined as a legal entity  
Lack of clear allocation of responsibilities  
Legal responsibility for sanitary controls of fishery products not allocated to competent authority  
Legislation inadequate (approval and approval conditions, powers of inspectors, penalties)  
No HACCP requirements defined in legislation  
Water quality standards not defined  
Lack of control system for bivalve or gastropod molluscs (toxic phytoplankton)  
No list of poisonous fish

**Inspection and approval procedures**

No written inspection programme or documented procedures  
Inspection frequency of establishments too low  
No approval/withdrawal procedures defined

**Inspection activities**

Insufficient inspection staff, and lack of inspection skills  
Weak reporting of inspections; reports not communicated to establishment  
No routine official checks on water supply  
Inspection programme and record keeping insufficient  
No laboratory testing in support of sanitary controls for fishery products  
National flagged vessels not registered for sanitary controls, and not inspected  
Inadequate checks on parasites

**Laboratories**

No official laboratories nominated  
Insufficient laboratory facilities to support inspections  
Lack of written analytical procedures for laboratory staff; use of incorrect methods  
Laboratory management and quality control weak, especially with respect to EN45001  
No inter-calibration of laboratory network

**Industry conditions**

HACCP system not implemented and not audited by competent authority  
Establishments and freezer vessels do not comply with 91/493/EEC (typically in respect of water testing, pest control, layout and general hygienic conditions)  
Poor hygienic conditions at landing sites  
Inadequate medical checks on personnel

**Certification**

Certificate does not conform with Decision 95/328  
Security of health certificates not adequately controlled  
Poor identification, batch control and traceability  
Poor controls over re-processing for export of imported fishery products

**Residue monitoring**

No monitoring programme for pesticides, biotoxins and heavy metals or other residues defined or implemented for fishery and/or aquaculture products  
Confusion between monitoring for aquaculture products (Directive 96/23/EC) and other hazards (Directive 91/493/EEC)

**Actual health problems**

Heavy metal and microbial contamination of fishery products

### 6.1.1 Reasons for lack of implementation capacity

There are several reasons why some ACP countries have difficulty in meeting the requirements of the European legislation in respect of health controls for fishery products. On the one hand there are environmental factors related to the nature of the production system for fishery products. On the other are the limitations of implementation capacity.

The fish supply chain in many ACP countries is characterised by large numbers of small-scale fishers, separated by long distances and with poor communications. Infrastructure for handling and distribution of fishery products is frequently under-developed. Such an environment is not conducive to effective inspection and control.

In addition, many ACP countries, and localities within them, have general health conditions which are not well developed in terms of sanitation, safety of water supply and personal hygiene. There is also an elevated level of hazards presented by tropical climates and by insect and rodent pests, all contributing to the challenge faced by the Competent Authority.

The implementation of health controls for fishery products defined in the European Directives and regulations requires a coordinated application of technical, legal, and financial resources within an appropriate organisational structure. Many ACP countries have difficulty in accessing and mobilising the human and financial resources required to implement these control systems.

In addition, existing systems of control are frequently based on sampling, inspection and certification of products for export, where laboratory testing provides the basis for determining product safety. Significant effort is required to change the inspection culture to one of process control (as defined in the EU's system of official control), where the inspector makes the decision about the safety and approval of any particular establishment.

Furthermore, governmental staff, including those of the Competent Authority, in many ACP countries receive relatively low salaries. In some cases this has encouraged over-sampling and corrupt practices, which directly undermine the development of effective health controls.

## 6.2 *Weak integration of small-scale fisheries in international trade*

An estimated 10% of exports from West African ACP states are derived from small-scale fisheries. One clear route by which globalisation can benefit such communities is by providing the means for an increased proportion of products from this sector to enter international, regional and local trade.

Improving the health conditions of production will have some clear benefits on health of consumers and on overcoming technical health barriers to trade. Furthermore, the improved control over production which is derived by the application of modern food safety management systems, such as HACCP, is known to deliver improvements in quality, yield, marketing and ultimately improves profitability of commercial enterprises.

As mentioned above there are a number of barriers to this development which must be addressed. Small-scale fisheries as a source of supply for exports are characterised by extensive distribution systems, relatively low yields of exportable products and peripheral locations. They are typically located in regions with weak communication infrastructure, which lack sources of clean water supply, sanitation and electricity for refrigeration. Fishing and primary processing and distribution activities are frequently conducted by men and women with limited education, and poor knowledge of hygiene and other basic requirements for food safety. Much needed investment in public infrastructure is inhibited by lacks of funds, and development of the private sector is hampered in many countries by the lack of investment capital and appropriate credit facilities.

## **7 Conclusion**

At least 20 less developed countries can be considered to have high levels of national dependency on international trade in fishery products. Several more countries have regions within them which may also be considered to be dependent on this trade. Food safety legislation applied by developed country markets, in particular the EU and the USA, can have a major potential impact on fishery product trade, and implications for social conditions in supplying countries.

More work is required to understand the contribution of small-scale fisheries in less developed countries international trade, and the relation with industrial and foreign fishing. However, it is clear that more stringent health controls in major markets pose a significant and immediate challenge to less developed countries in mobilising the technical, legal and human resources required for improved product safety.