

2011 World Seafood Congress



Seafood Compliance Challenges of the International Food Trade: The Gambia's Experience

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The Gambia



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The Gambia



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Background information

- **The Gambia, small country in West Africa,**
 - Population of about 1.7million
 - Economy dependent on rain fed agriculture, fisheries and tourism
 - Groundnuts main export cash crop and foreign exchange earner
 - Seafood exports second only to groundnuts



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Background information contd.

- **Fisheries sector important role in the economy providing:**
 - food and nutrition security, employment and poverty reduction, foreign exchange earnings
 - more and more people dependent on fisheries with over 200,000 people estimated to directly or indirectly depend on fisheries and related activities for livelihoods.



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Background information contd.

- **Fisheries sector comprises:**
 - **Industrial fisheries** - confined to marine waters, characterized by capital-intensive inputs
 - **Artisanal or small-scale fisheries** - in both marine coast and the River, characterized by low capital inputs and labour-intensive activities
 - Approximately: **6,000 fishers, 2,000** fishing canoes in **155** landing sites
 - Supplies over 90% of fish exported by FPEs and over 95% of domestic supplies
 - per capita fish consumption estimated at 28kg



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Sub 3

Background information contd.

- Artisanal and Industrial Fishery Production (1998-2010)

Production (MT)			
Year	Industrial	Artisanal	Total
1998	7,011.67	26,533.48	33,545.16
1999	10,249.30	29,743.20	39,992.50
2000	9,236.60	26,867.00	36,103.60
2001	11,198.00	32,016.00	43,214.00
2002	12,160.00	32,336.00	44,496.00
200z3	11,005.00	34,365.00	45,370.00
2004	8,375.00	29,317.00	37,692.00
2005	4,600.00	30,169.00	34,769.00
2006	2,830.00	36,898.00	39,728.00
2007	4,000.00	43,007.00	47,007.00
2008	2,973.00	42,841.00	45,814.00
2009	3,179.00	45,881.00	49,060.00
2010	4,001.30	45,910.00	49,911.30



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Background information contd.

- Fishery products exports are to EU, USA, Africa and Asia

Exports of Fish and Fishery Products (1984 - 2010)		
Year	Qty (MT)	Val. (GMD)
1998	1,665.50	33,293,224.67
1999	1,676.50	36,563,649.00
2000	900.70	32,779,476.58
2001	948.80	35,726,198.72
2002	932.40	21,334,061.57
2003	445.00	11,629,895.33
2004	405.40	7,694,241.42
2005	751.00	9,956,837.42
2006	624.53	2,287,733.23
2007	1,480.00	67,432,811.27
2008	1,363.20	47,847,297.38
2009	2,087.00	64,919,035.59
2010	3,563.00	100,041,608.61



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Objectives and contribution to economy

- **Development objectives and contribution to the economy relate to:**
 - Rational management and sustainable exploitation of fishery resources
 - Fish for nutrition, food security and poverty alleviation
 - Employment and income generation with greater involvement of nationals, especially youth and women
 - Revenue and foreign exchange earnings through trade in fishery products
- **The latter two give rise to the seafood compliance challenges of The Gambia**



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The Compliance Challenges

- **Major challenges facing seafood exports to the EU relate to meeting fast changing and stricter food safety requirements**
 - Fast changing regulatory requirements of the EU pose challenges to Gambia with limited resources to cope with pace of development
 - Not only is it a challenge to reach compliance, but to maintain it with consistency



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The Compliance Challenges

- The Gambia has been exporting seafood to various destinations with EU as the preferred destination of exporters
 - Earlier requirements based on rather simple codes of hygiene practice and non-complicated legislation
- In 1996, Gambia received the first EU inspection mission



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The Compliance Challenges

- National legislation (FR 1995) was adequate, but deficiencies were identified in the system
 - Correction of deficiencies involved mainly structural and hygiene improvements.
- Ten years later, in 2006 another EU FVO mission undertaken to evaluate the system of health controls in place



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The Compliance Challenges

- With coming into force of Regulation (EC) No. 178/2002 - common basis for EU food law, 1st January 2006 EU **Food Hygiene package**:
 - Regulations (EC) Nos. 852 and 853/2004
 - Regulation (EC) 854/2004 on official controls
Regulation (EC) 2073/2005 on microbiological criteria , among other, the challenges intensified
- Regulations **(EC) No 333/200** on sampling and analysis for official control of contaminants and Regulation (EC) No 1881 on maximum levels for certain contaminants - central to challenges faced



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The Compliance Challenges

- The Gambia's legislation again became obsolete and the development of up-to-date legislation fundamental
- The 2006 EU FVO audit mission found deficiencies including non equivalent legislation
 - 8 recommendations addressed to the CA for correction of deficiencies.
- Again , CA responded with an action plan whose implementation met with difficult challenges



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The Compliance Challenges

- In 2010 another FVO mission came and concluded that:
 - there was a system of public health controls in place with sufficient number of staff
 - The CA had taken corrections but that the effectiveness of the control system could be compromised by the lack of official controls on contaminants, histamine and microbiology



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The Compliance Challenges

- Other deficiencies were in:
 - the official controls of water,
 - state of hygiene of vessels and landing sites
 - implementation of HACCP plans and
 - traceability of fishery products.
- The mission came up with a 12 points set of recommendations to address deficiencies



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The Compliance Challenges

- The competent authority once again responded with a time bound action plan for corrections with even more intense challenges:
 - Some of the previous (2006) proposed action elements were yet to be fully accomplished
 - Laboratory testing had to be undertaken on contaminants, quality of water
 - Microbiological criteria



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The Compliance Challenges

- There was still inadequate capacity and scarce resources as the following conditions prevailed:
 - Lack of knowledge about the new EU legislation/ or understanding of it by the seafood processing industry and also by competent authority inspectors
 - Low level of training in both industry and the CA



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The Compliance Challenges

- Low level of knowledge about the HACCP principles which had moved from being voluntary to mandatory implementation
- Inadequate organization of the CA
- Inadequate capacity in the CA to effectively undertake necessary official controls
- General lack of resources: Inspection equipment and logistics
- Lack of competent support laboratories to carryout official testing
- Hence, inadequate guarantees by the CA in certifying export products
- Even under these conditions, the CA still had to ensure compliance of seafood products for export to EU.



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Ensuring Compliance

- **What then was done?**
 - The CA ensured greater vigilance with stricter enforcement of EU legislation
 - Applied anctions on non compliant FPEs (delisting of 2 in 2008, one in 2010 and suspensions
 - Development of equivalent legislation, with assistance of the EU SFP – (2005-2011)
 - Implement national training program – along the food chain (fishers to industry personnel), CA inspectors through the FAO-STDF capacity building regional Project



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Ensuring Compliance

➤ What then was done?

- Request for technical assistance from the EC SFP Programme **(6 expert missions to assist industry, training of CA inspectors and development of control procedures)**
- Ensure intensified inspections of premises and facilities
- Ensure official testing from abroad (expensive) while developing competent (accredited) laboratories through the EC/UNIDO West Africa Quality Programme
- Received SFP material support (Vehicles, motor bikes, inspection equipment and test kits)



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Temporary Suspension of Imports

A slap in the Face

- Due to delay in implementation of actions, submission of progress and lack of evidence on official testing,
 - EU imposed a partial ban on imports - **a lot of noise but perfect lesson for all**
 - Progress report submitted with evidence of considerable progress
 - Following review of progress and request to lift the ban, EU lifted the ban and allowed resumption of imports - fresh and frozen products from three FPEs **but not smoked products**
 - EU verification mission to The Gambia in March 2011.



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Improved Compliance

- **FVO Mission concluded that the CA has undertaken improvements in the control system:**
 - Inspection reports comprehensive and based on checklists
 - The updated Fishery Products Regulations 2011 which came into force on 1st March 2011 can be considered largely equivalent as it reflects EU requirements for fishery products.
 - The CA fully addressed seven out of twelve recommendations from the previous mission and the remaining five recommendations partly addressed or in the process of being addressed.



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Improved Compliance

- Establishments have broadly satisfactory conditions with non-compliances corrected.
- Situation with smoked products overall unsatisfactory, mainly in view of lack of appropriate controls on benzo(a)pyrene and process controls
- In 2010/2011 the competent authority began to carry out the required laboratory analyses except for some parameters required by EU legislation
- The mission report made four (4) recommendations, being addressed aimed at rectifying identified shortcomings and enhancing the control system in place



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Holding On Next Step – Way Forward

- Ensure continuous improvement (at landing sites, vessels, ice plants, transport vehicles, establishment inspections and audits - ensure implementation of HACCP procedures with verifications)
- Ensure training at all levels
- Provide supervision and training where necessary to industry (**dual responsibilities of inspectors in DCs**)
- Stricter enforcement of requirements – effect sanctions without compromise



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Holding On Next Step – Way Forward

- Address difficulties of testing – send official samples to accredited labs (costly and time consuming with delays)
- Implement technical assistance (from the EC-EDES Programme to review control procedures, further train inspectors and extend assistance to industry)
- Advocacy for greater commitment by government and industry – shout loud for attention



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