

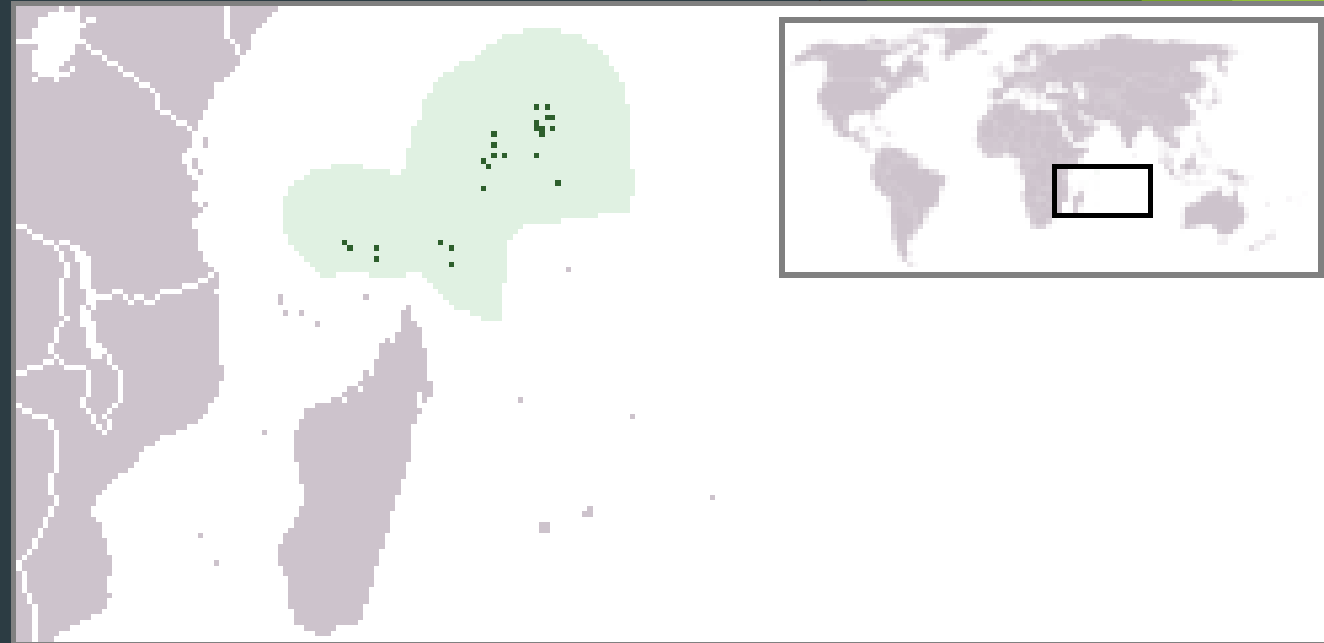
Development of a fish inspection and control system in compliance with ISO 17020

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The Seychelles Islands

- ▶ - Seychelles is a Small Island Developing State (SID) in the Indian Ocean.
- ▶ - Consists of 115 islands and with a population of 90,000 (2012)
- ▶ - Upper middle income country with a GNP per capita of > US \$ 10,000 (2011)



The Seychelles Islands

- ▶ Main industries are fishing and tourism
 - Direct and Indirect Employment = c. 6,500 (15% formal employment)
 - Fisheries 47% foreign exchange inflow
 - Fishing Contribution to GDP 9.3% (official figure 2011)
 - Include all fisheries related activities - 20%
 - Coastline of 491 Km EEZ 1.4 million km² Land area - 451km²
 - Tourism 41% foreign exchange inflow



The Fisheries sector

Three main sub-sectors:-

- ▶ Artisanal - 400 - 450 vessels ranging in sizes 5m - 16 m - 1200 - 1500 fishermen
- ▶ Semi-industrial - 12 vessels targeting mainly swordfish and tuna for the export market.
- ▶ Industrial fisheries - 40 purse seiners and long-line fishing (fleet entirely foreign owned, mainly Spanish and French and some Asian)
- ▶ EU vessels operate under the Seychelles/EU Fisheries Partnership agreement and other private agreements.

Competent Authority

- ▶ The Fish Inspection and Quality Control Unit, Seychelles Bureau of Standards (FIQCU,SBS)
- ▶ Formerly under the Directorate of Veterinary Services, Ministry of Agriculture and Natural Resources
- ▶ In 2009, transferred under the Chief Executive officer of the Seychelles Bureau of Standards
- ▶ Small team of 9 inspector - Chief Fish Inspector x 1, Principal Fish Inspector x1, 2 Senior Fish Inspectors x2 and the rest junior inspectors

Export of Fishery Products Act of 1996

- ▶ Export of Fisheries Products (Sanitary) Regulations 2010
- ▶ Defines control system, based on EU food hygiene package and official control
- ▶ Implemented by a manual of procedures for official inspection and certification, included:
 - ▶ Inspection forms
 - ▶ Sampling and monitoring system
 - ▶ Guidelines for inspectors (procedures, behaviour etc)
 - ▶ Key documents (notices, certificates etc)

Rationale for development of documented, certified control system

- ▶ Provide documented system for implementation of legislation by inspection team (existing systems incomplete eg. lack of non-compliance procedure)
- ▶ Standardise approach between inspectors, sectors and establishments
- ▶ Benchmarks control system to an international standard
- ▶ Increases confidence in food safety compliance in exported products
- ▶ Protects against impact of staff changes with limited technical resource pool

Options for development of certified control system

- ▶ ISO 9001:2000 *Quality management*

General

Customer/cliente service orientated

- ▶ ISO/IEC 17020: *General criteria for the operation of various types of bodies performing inspection*
- ▶ Focused on compliance/non-compliance concept

Initial Scope: Official controls applied to fishery business operators exporting fresh, frozen and canned tuna

Guidance document IAF/ILAC A4: Guidance on the application of ISO/IEC 17020: Contents of quality manual

General

Background of the inspection body

Definitions and conventions

Main ISO 17020 Requirements

1. Administrative requirements
2. Independence, impartiality and integrity
3. Confidentiality
4. Organisation and management
5. Quality system
6. Personnel

7. Facilities and equipment
8. Inspection methods and procedures
9. Handling inspection samples and items
10. Records
11. Inspection reports and inspection certificates
12. Subcontracting
13. Complaints and appeals
14. Cooperation

Key steps in the process

- ▶ Technical review and assessment
- ▶ Analysis of control sub-systems (inspection, approval, sampling and testing, certification, alerts etc)
- ▶ Gap analysis (cf to ISO17020 requirements)
- ▶ Nominate ISO implementation team
- ▶ Prepare development plan
- ▶ Drafting of written quality systems & procedures
- ▶ Drafting of working instructions and forms
- ▶ On-site testing and verification
- ▶ Preparation of quality manual
- ▶ Training of inspection staff
- ▶ Implementation
- ▶ Periodic review

Procedures

Chapter 6: Organisation and management

PRO06/01: Inspection benchmark procedure

Chapter 7: Quality System

PRO07/01: Document control

Chapter 9: Facilities and Equipment

PRO09/01: Control of equipment

PRO09/02 Administration of tests equipment with calibration plan

WI/51: In-house check Comark Foodcheck Thermometer

WI/54: In-house performance check and calibration balance

Procedures

Chapter 10: Inspection procedures and methods

PRO10/01: Development of an annual inspection plan and reporting on outcome

PRO10/02: In-depth inspection (detailed compliance with permit conditions)

WI/22: In-depth inspection processing establishments

WI/23: In-depth inspection freezer/factory vessels

PRO10/03: Interim inspection (compliance with permit conditions relating to GMP/GHP)

WI/26: Interim inspection processing establishments

WI/27: Interim inspection freezer/factory vessels

PRO10/04: Spot check (no prior notice, specific target)

PRO10/05: Non-compliance

PRO10/06: Pre-Approval Inspection: Outline permits

PRO10/07: Award of operating permit

PRO10/08: Renewal of operating permit

PRO10/09: Export certification: Issue of export certificates to EU from Seychelles operators

PRO10/10: Export certification: Issue of export certificates for export from non-Seychellois vessels

PRO10/11: In-house testing by the FIQCU

PRO10/12: Responding to external incident management and product recall

Procedures

Chapter 11: Handling of inspection samples and items

PRO11/02: Sampling, sample preparation of fish and environmental samples for official control consigning them to external laboratories for testing and reporting of results

Chapter 13: Inspection reports and inspection certificates

PRO12/02: Reporting the results of inspection

Chapter 14: Sub-contracting

Laboratory testing in external laboratories for testing (sub-contracting)

Chapter 15: Complaints and appeals

PRO14/01: Dealing with complaints, appeals, disputes

Example of non-compliance procedures

Classification

Each non-compliance to be classified as critical or non-critical.

- ▶ **Critical non-compliance:** Non-compliance which presents a severe and/or immediate risk to public health; critical non-compliances may only occur in establishments or vessels which are in operation
- ▶ **Non-critical non-compliance:** non-compliance which presents only limited or minimal risk to public health.

Each non-compliance to be given a unique code number.

Non-compliance procedures

Notification and follow-up procedures:

- ▶ PRO1002/F01: Internal Inspection Record Form
- ▶ PRO1005/F01: Non-compliance notice
- ▶ PRO1005/F02: Final Non-compliance notice
- ▶ PRO1005/F03: Outstanding Non-Compliance Record Sheet
- ▶ Management Decision sheet

In case of non-correction:

Non-compliance	Action
Critical	Closure
Non-critical	Negative renewal

Non-compliance record sheet (F03)

D. Non compliance Notice

Non-compliance Notice					
Date: _____		Inspection Place _____			
Inspectors Name: _____			Inspection REF _____		_____
Time spent for on Inspection; From _____			To _____	Hours _____	
Type of Inspection					
In-depth		Interim		Spot-Check	
Checklist used					
Section 1			Section 2		
	Identified Non-Compliances	Evidence	Severity	Corrective Action Implemented	Inspectors Signature and Date of completion
•					

Outcome of project

- ▶ Accreditation plan developed and in progress
- ▶ CA experienced serious setback due to frequent delay in revision
- ▶ 2 yrs absence of the quality manager especially trained and dedicated to the project is a major setback
- ▶ Now in the last stage of reviewing and testing the document
- ▶ A lot of modification and adaptation had to be made.
- ▶ Early 2014, application to be send to SADCAS for document review
- ▶ Preparation for a pre-assessment by SADCAS - mid 2014
- ▶ Depending on outcome, preparation for Initial Assessment end of 2014

Lessons learnt

- ▶ Inspection for official control includes professional judgment regarding safety of processes (eg.HACCP), therefore need to include qualifications and skills of staff
- ▶ Flexibility required to address different food safety hazards (heavy metals, histamine, *Cl.botulinum*) adds complexity
- ▶ Some procedures e.g non compliance are too complicated /to theoretical and difficult to follow
- ▶ Being still in early stage of implementation, a dedicated quality manager is a must.
- ▶ Difficult to keep a high level of motivation and interest of all staff with the system

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