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**FAO WORKSHOP ON RISK-BASED FISH INSPECTION AT  
BORDERS**

**Rome, 30 October to 1 November 2019**



Report of the  
FAO WORKSHOP ON RISK-BASED FISH INSPECTION AT BORDERS  
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## **PREPARATION OF THIS DOCUMENT**

This document presents the outcomes of the FAO Workshop on risk-based fish inspection at borders. It provides a summary of the causes of rejection of fishery and aquaculture products in some of the main importing countries, and highlights the difficulties exporting countries face in accessing major markets. Outlining the main points of discussion which emerged during the workshop, it describes different national inspection systems and offers a series of recommendations to improve reporting and promote transparency in international trade. For reference, materials presented during the course of the workshop have been included as annexes.

## **ABSTRACT**

The FAO Workshop on risk-based fish inspection at borders was held to understand the key food safety standard compliance challenges when exporting fishery and aquaculture products; in doing so, it sought to guide future FAO work in the area of trade facilitation. Available data from some of the main importing countries was presented during the event and the differences between the rejection profiles analysed. Participating countries presented their food safety regulation frameworks, which provide the basis – as well as the authority – to operate a food import control system designed to protect consumers and facilitate fair practices in food trade. Participants explained how their respective import food control systems provided the level of protection deemed appropriate by the country, establishing safety measures that protected human life or health within a country's territory. Participants recommended the application of risk-based imported fish controls and provided a set of recommendations to improve the reporting of import rejections, as well as recommendations to improve data analysis.

## CONTENTS

Preparation of this document.....	iii
Abstract .....	iv
List of contributors .....	vi
Abbreviations and acronyms .....	vii
<b>Introduction .....</b>	<b>1</b>
<b>Background to risk-based imported food controls.....</b>	<b>1</b>
<b>Border rejections .....</b>	<b>4</b>
European Union: Alerts and border rejections of fishery and aquaculture products in 2018 .....	4
Canada: Border rejections of fishery and aquaculture products in 2018 .....	5
Japan: Border rejections of fishery and aquaculture products in 2018 .....	6
The United States of America: Border rejections of fishery and aquaculture products in 2018.....	7
<b>Import systems.....</b>	<b>9</b>
Canada.....	9
China.....	11
Japan .....	11
New Zealand .....	13
European Union .....	14
<b>Workshop discussion and conclusions.....</b>	<b>17</b>
<b>List of workshop recommendations.....</b>	<b>19</b>
<b>References .....</b>	<b>20</b>
<b>Annexes</b>	
<b>1. Recommendations from FAO Fisheries Technical Paper No. 473 (FAO, 2005).....</b>	<b>21</b>
<b>2. Workshop programme.....</b>	<b>23</b>
<b>3. List of participants .....</b>	<b>25</b>

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## ABBREVIATIONS AND ACRONYMS

<b>BIP</b>	border inspection post
<b>CBSA</b>	Canada Border Services Agency
<b>CCFICS</b>	Codex Committee on Food Import and Export Inspection and Certification Systems
<b>CCFFP</b>	Codex Committee on Fish and Fishery Products
<b>CFIA</b>	Canadian Food Inspection Agency
<b>CHED</b>	Common Health Entry Document
<b>DALY</b>	disability-adjusted life year
<b>DSP</b>	diarrhetic shellfish poisoning
<b>EU</b>	European Union (Member Organization)
<b>FAO</b>	Food and Agriculture Organization of the United Nations
<b>FDA</b>	Food and Drug Administration
<b>FIR</b>	Canadian Food Information Regulation
<b>GACC</b>	General Administration of Customs of the People's Republic of China
<b>GMO</b>	genetically modified organism
<b>HACCP</b>	Hazard Analysis Critical Control Points
<b>HRI</b>	high regulatory interest
<b>INFOSAN</b>	International Food Safety Authorities Network
<b>IP</b>	Identity Preservation
<b>IRI</b>	Increased regulatory interest
<b>MHLW</b>	The Japanese Ministry of Health, Labour and Welfare
<b>NFIM</b>	Products, Trade and Marketing Branch
<b>NZFS</b>	New Zealand Food Safety
<b>RASFF</b>	Rapid Alert System for Food and Feed
<b>RIS</b>	Risk and Intelligence System
<b>SFCA</b>	Safe Food for Canadians Act
<b>SFCR</b>	Safe Food for Canadians Regulations
<b>TRACES</b>	Trade Control and Expert System
<b>TBT</b>	technical barriers to trade
<b>UNIDO</b>	United Nations Industrial Development Organization
<b>WHO</b>	World Health Organization
<b>WTO SPS</b>	Agreement on Sanitary and Phytosanitary Measures (SPS Agreement)



## **INTRODUCTION**

Fishery and aquaculture products are among the world's most traded commodities and yet exporters continue to face difficulties in accessing major markets. In particular, they can struggle to understand the import controls which may lead to fishery and aquaculture products being rejected, detained or in some instances destroyed.

In 2005 the Food and Agriculture Organization of the United Nations (FAO) developed and published a Fisheries Technical Paper (No. 473) entitled, "Causes of detentions and rejections in international fish trade" (FAO, 2005). The paper contained an analysis of the detentions and rejections of fishery and aquaculture products in some of the main fish importing countries, and its recommendations are listed in Annex 1. In 2015, the United Nations Industrial Development Organization (UNIDO) carried out a analysis entitled "Meeting Standards, Winning Markets" (UNIDO, 2015) which highlighted the compliance challenges for key trade standards in food commodities. Both publications examined standards and technical regulations as well as rejection data to assess their impact on developing countries. In 2019, after FAO had conducted a careful analysis of the available seafood rejection data from Canada, European Union, Japan and the United States of America in 2018, NFIM brought together experts from various importing countries to discuss the data and processes in their respective territories.

The FAO workshop on risk-based fish inspection at borders was held in Rome from 30 October to 1 November 2019 (see Annex 2 for workshop programme and Annex 3 for participants). During the workshop, FAO outlined the seafood rejections based on available data and participants provided an overview of the systems in place in their countries. Based on the data, information and case studies supplied by the participating countries, the workshop intended to:

1. identify best practices within a "risk-based" food import control system;
2. recommend further areas for consideration, while being consistent with Codex/FAO guidance; and
3. identify, where possible (and based on the information from 1 and 2), capacity building areas for developing countries, which might in turn reduce import rejections and detentions.

Participating countries were tasked with providing case studies to illustrate how they implement the risk-based imported system.

## **BACKGROUND TO RISK-BASED IMPORTED FOOD CONTROLS**

Countries continue to implement risk-based imported food controls to improve their ability to monitor the safety of imported food – and more generally the safety of food in international trade – based on recognized standards. In 2005, FAO Fisheries Technical Paper No. 473 recommended that Codex should strengthen international guidelines relating to import control systems, and that all interested parties should expand their risk assessment outputs in order to better serve risk-based approaches to food control.

This ongoing international work has been conducted through different Codex Alimentarius Committees, on which FAO plays an important role through its provision of scientific advice. The principles, guidelines and recommendations set out by the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) are particularly important with regard to imported and exported food. The CCFICS guidance assists countries to:

- harmonize methods and procedures;
- apply measures to provide assurance that foodstuffs comply with requirements, particularly statutory health requirements;
- assess the utilization of quality assurance systems under bilateral/multilateral arrangements;
- implement consistent formats, declarations and language of official certificates; and
- exchange information in relation to food import/export control.

This guidance is set out in several documents including: the Principles for Food Import and Export Inspection and Certification (FAO and WHO, 2012a); the Guidelines for Food Import Control Systems (FAO and WHO, 2012b); Principles and Guidelines for National Food Control Systems (Codex Alimentarius Commission, 2013); and Principles and Guidelines for Monitoring the Performance of National Food Control Systems (FAO and WHO, 2017).

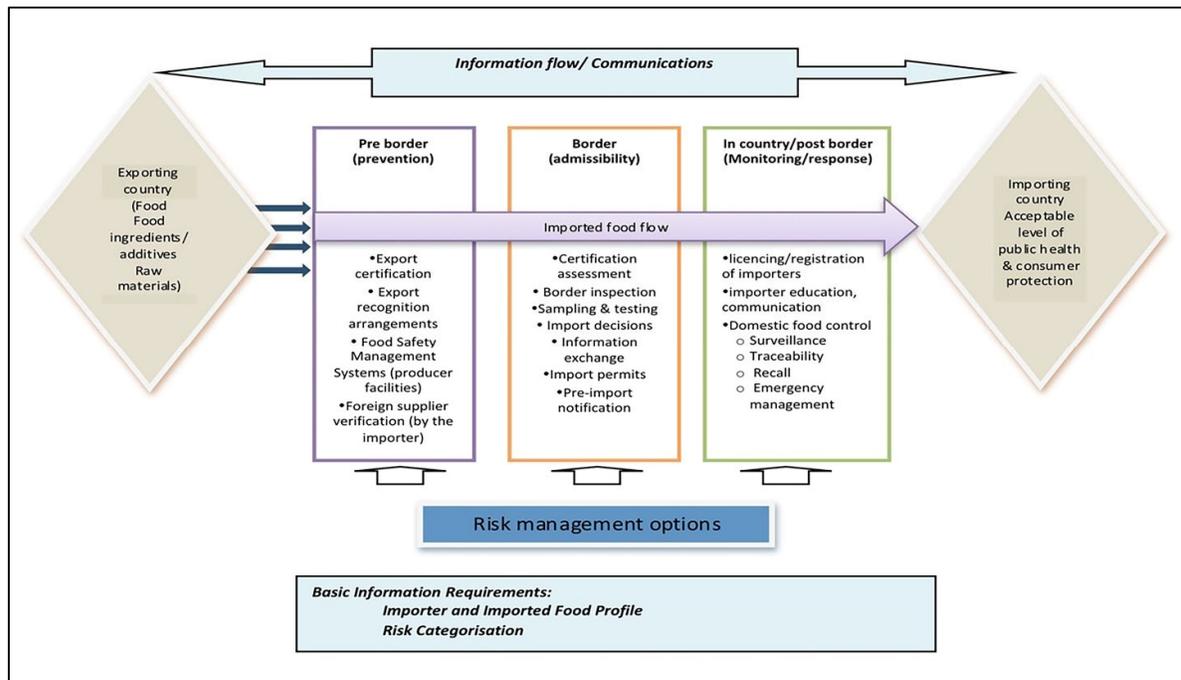
FAO also works with Members to assist them to strengthen their national food control systems, notably by developing evidence-based food safety policies, and developing capacity with respect to risk-based food inspection, sampling and analysis, as well as risk communication and food safety management.

Two recent FAO publications intended to assist countries in improving their food control systems: the FAO/WHO Food Control System Assessment Tool (FAO and WHO, 2019) and the FAO Risk based imported food control manual (FAO, 2016). The objectives of the publications were to help countries operationalize the principles and guidance in Codex documents.

The FAO/WHO Food Control System Assessment Tool is based on a number of Codex texts (e.g. CAC/GL 82-2013 and CAC/GL 91-2017) and provides a global assessment of the national food control system (e.g. inputs, controls, interactions with stakeholders, evidence and risk basis). The assessment process includes a strategic planning phase to identify improvements based on the priorities identified by each country. The assessment results thus provide a baseline for countries as well as targets for monitoring progress. Countries have provided feedback which indicates that the benefits of the above go beyond the assessment itself: they report an increased confidence and understanding of the system, as a result, as well as shared decision-making and support to implement Codex texts.

The FAO Risk-based imported food control manual is based on Codex principles, and assists countries to put them into operation. The import/export framework is illustrated in the following diagram:

**Figure 1. Imported food control framework outlining key components (e.g. profiles, risk categorization) and potential risk management options**



Source: FAO Risk based imported food control manual (FAO, 2016).

The Risk-based imported food control manual provides information to countries as they implement Codex guidance, including technical advice, training and other capacity development activities to develop risk-based import control systems, such as:

- framework for controls to happen pre-border/at the border/post-border;
- risk categorization approach;
- programme planning approach;
- legal considerations;
- support services.

## BORDER REJECTIONS

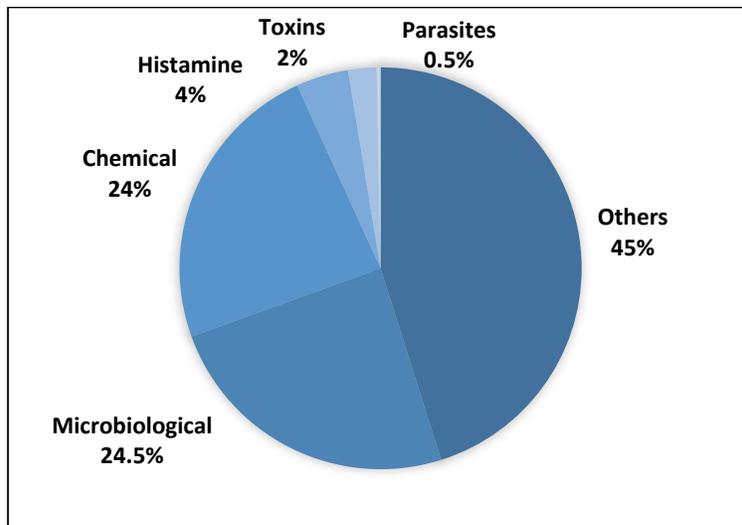
During the workshop, the annual analysis of border rejections of fishery and aquaculture products was presented. The Globefish website provides information and analysis on fish trade globally, and includes data on rejections and detentions for Canada, European Union, Japan and the United States of America.

The information was provided by: the Rapid Alert System of Food and Feed (RASFF) of the European Union, the Canadian Food Inspection Agency (CFI), the Quarantine Station of the Japanese Ministry of Health, Labour and Welfare, and the Import Refusal Report of the Food and Drug Administration (FDA) of the United States of America. With the exception of Canada, it does not include information on rejections that are not related to human health (e.g. non-compliant documentation, labelling). In the European Union that information is included in the TRACES system and in Japan, by the Consumer Affairs Agency.

The information on rejections posted on the Globefish website falls into six categories: chemical, histamine, microbiological, other, parasites and toxins. For 2018, the website provided the following data on rejections.

### European Union: Alerts and border rejections of fishery and aquaculture products in 2018

**Figure 2. Percentage of rejected fishery and aquaculture products in the European Union, by cause, in 2018**



Source: RASFF Portal (European Commission, 2018).

In 2018, a total of 308 alert and border rejections were recorded through the Rapid Alert System for Food and Feed (RASFF). Most rejections fell into the “other causes” category (139 cases, 45 percent of the total), followed by microbiological issues (75 cases, 24.5 percent). The third-largest cause of rejections was as a result of chemical issues (73 cases, 24 percent), followed by histamine (13 cases, 4 percent) and toxins (7 cases, 2 percent). Parasites had only one recorded case (0.5 percent of the total). In the “other causes” category, the main issues related to poor temperature control, with a total of 86 such cases (especially involving tuna), accounting for 61 percent of the category and 28 percent of the total detentions. The second cause of alerts and border rejections was improper health certificates, with 19 cases, mainly involving shark species. Other causes of rejections related to: products being unfit for human consumption (12 cases), unauthorized operators (8 cases), foreign bodies (6 cases), unsuitable packaging (6 cases), labelling issues (4 cases), allergens (3 cases), and finally one case involving illegal importation attempts with one case detected.

The main bacteria found in fishery products was *Listeria monocytogenes* with 24 cases, mainly in smoked salmon, followed by 21 cases of *Escherichia coli*, mostly found in mussels. The third microbiological cause was *Norovirus* with 21 cases, most of which was found in oysters. There were also seven detentions resulting from the presence of *Salmonella*, mainly in clams, the *Hepatitis A* virus in clams, and one case of *Vibrio* in mussels.

The main chemical issue involved the presence of mercury above maximum levels, which was mainly detected in swordfish. This issue accounted for a total of 42 alerts and border rejections, making up 58 percent of chemical causes.

The second most common issue was nitrofurans with 13 cases, mainly in shrimp. Other chemical rejections and detentions resulted from issues related to the detection of cadmium, leucomalachite green, sulphite, additives, crystal violet, and ofloxacin and contaminants.

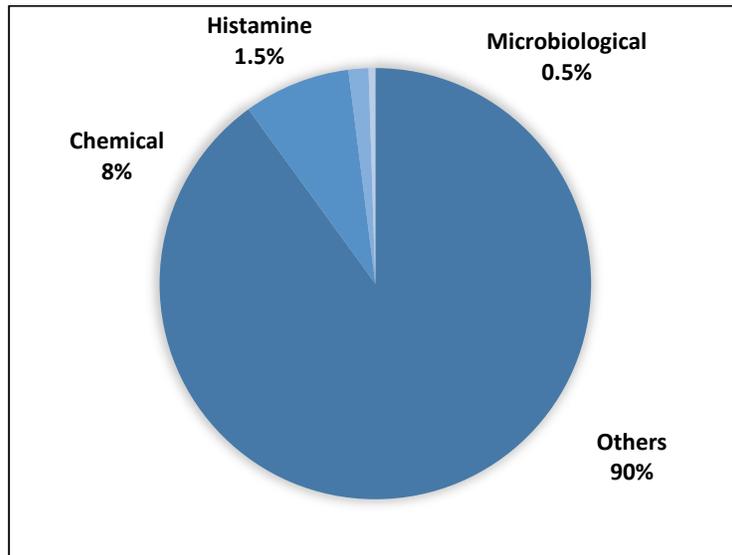
The detection of histamine above maximum levels accounted for 13 alerts and border rejections in 2018; these cases were mainly recorded in tuna.

Of the 7 alerts and border rejections resulting from the presence of toxins, diarrhetic shellfish poisoning was the largest group of marine biotoxins detected, with 5 cases reported, mainly found in mussels. The other group was amnesic shellfish poisoning with 2 cases in scallops.

There was only one case of parasitized products in 2018, arising from the presence of *Anisakis*.

### Canada: Border rejections of fishery and aquaculture products in 2018

Figure 3. Percentage of rejected fishery and aquaculture products in Canada, by cause, in 2018



Source: CFIA, 2018.

A total of 990 detentions of fish and fishery products were recorded in Canada in 2018. The vast majority (892 cases) came under the “other causes” category, followed by chemical causes with 76 cases, histamine with 15 cases, and microbiological with 7 cases. The “other causes” category accounted for 90 percent of total rejections, chemical for 8 percent, histamine for 1.5 percent and microbiological for 0.5 percent.

In the “other causes” category, the main problem related to label verification, with 699 cases making up 78 percent of this category. Other reasons for rejection under this category related to packaging issues and Food Information Regulation (FIR) requirements (47 cases each, mostly recorded in shrimp), sensory evaluation issues (40 cases, mainly in mackerel), and lack of net weight determination (27 cases,

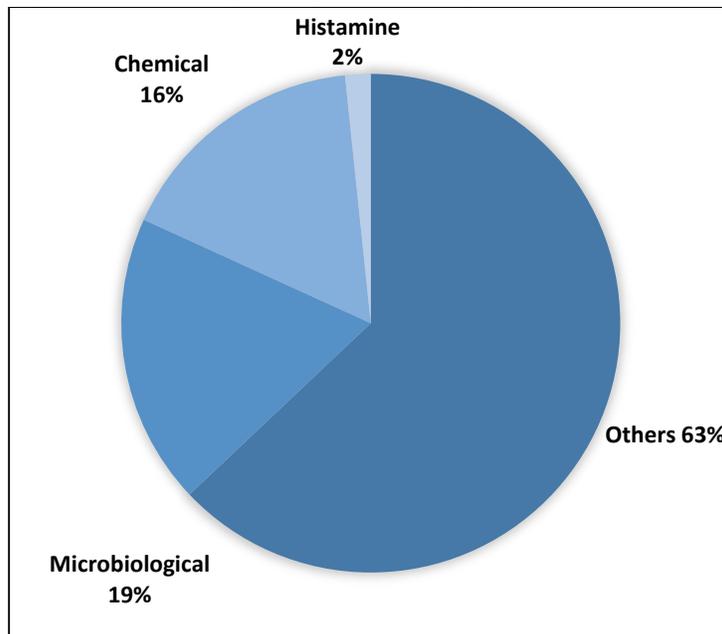
mostly in tuna). Finally, allergens accounted for 18 cases, mainly in crab, and there were 14 rejections as a result of can coding, especially in cod.

The main chemical issue involved the presence of non-permitted additives, with 23 cases, mainly in shrimp, followed by the presence of mercury above maximum levels (10 cases, primarily in tuna). Other chemical issues related to the presence of fluoroquinolones, sulphites, nitrofurans, triphenylmethane dyes, water activity, amphenicols, phosphates, benzoate, sorbate, tetracyclines, contaminants and Vitamin E.

*Staphylococcus aureus* and sterility were the main microbiological issues, with three cases each, and both found primarily in mussels. There was one case of *Listeria monocytogenes* recorded in salmon. Lastly, 15 border rejections of fishery products were recorded as a result of the detection of histamine above maximum levels, mostly in tuna.

### Japan: Border rejections of fishery and aquaculture products in 2018

Figure 4. Percentage of rejected fishery and aquaculture products in Japan, by cause, in 2018



Source: MHLW (2018).

A total of 106 border rejections of fisheries and aquaculture products took place in Japan in 2018. Most rejections were the result of microbiological issues, with 81 cases (76 percent of total rejections), followed by chemical causes (24 cases, 23 percent of the total) and one case in the “other causes” category (1 percent of the total).

Coliform represented the main microbiological issue, accounting for 42 cases (mainly found in shellfish and salmon), followed by the presence of live bacteria in 19 cases. The third most prevalent cause of rejection resulted from the detection of *Escherichia coli* in 17 cases, mostly found in “other seafood products”. Finally, there were 3 cases of *Salmonella* border rejections in tuna.

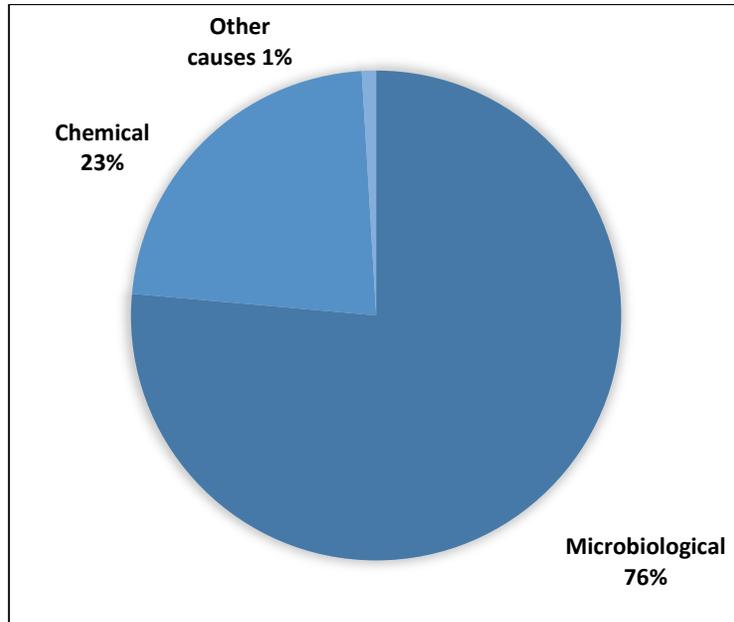
The most commonly reported chemical issue involved antimicrobials, accounting for 15 detentions, which represented 63 percent of total chemical rejections. The most frequently reported types of antimicrobials were enrofloxacin (7 cases) and furazolidone (6 cases), detected mostly in shrimp. The rejection for antimicrobials also includes chloramphenicol and sulfadiazine, with a single case of each.

Other chemical issues were caused by sulphur dioxide, cyclamic acid and nitrogen dioxide, all accounting for a single case each.

In the “other causes” category, the only issue related to the unfinished disposal of offal, with the only case recorded in pufferfish. There was a decrease in this category of rejections from the 6 cases recorded in 2017.

### The United States of America: Border rejections of fishery and aquaculture products in 2018

**Figure 5. Percentage of rejected fishery and aquaculture products in the United States of America, by cause, in 2018**



Source: FDA, 2018.

There were 1 457 border rejections of fishery and aquaculture products in the United States of America in 2018, most of which were attributable to other causes (917 cases), followed by microbiological issues (275). There were also 241 cases related to chemical issues and 24 rejections in the histamine category.

Other causes accounted for 63 percent of total rejections, while microbiological accounted for 19 percent, chemical for 16 percent and histamine for 2 percent of the total.

The main problems identified in the “Other causes” category were associated with products found to be unfit for human consumption, decomposed or putrid. All of these issues were categorized as “filthy” and accounted for 602 cases, which amounted to 66 percent of this category and 41 percent of the total border rejections of fishery and aquaculture products. This was followed by adulteration (88 cases) and MfrHACCP (61 cases).

According to the FDA, MfrHACCP means that:

The product appears to have been prepared, packed, or held under insanitary conditions, or it may be injurious to health, due to failure of the foreign processor to comply with HACCP (Import Refusal Report, Violation Code Translations, 2015).

Other specific reasons for detentions under this category related to packaging issues (57 cases), misbranding (36 cases), labelling problems (34 cases), no process (18 cases), unsanitary conditions (18 cases) and allergens (3 cases).

The main bacteria found was *Salmonella* with 202 cases, mainly in shrimp, representing 73 percent of microbiological issues. The second microbiological cause involved the *Hepatitis A* virus, with 38 cases in tuna. Finally, there were 35 cases of *Listeria monocytogenes*.

The main chemical issues in 2018 involved the detection of residues of veterinary drugs, with 192 cases (mainly in eel), accounting for 80 percent of total chemical causes. In addition, there were 21 cases of nitrofurans (mainly in shrimp), and 3 cases of chloramphenicol. It is important to highlight that although nitrofurans and chloramphenicol are residues of veterinary drugs, they are considered as separate causes in this category by the FDA. Unauthorized additives (13 cases, mostly in eel) are the third most common chemical cause, followed by pesticides with 12 cases mainly in milkfish.

In 2018, there were 24 cases of rejections on the grounds that histamine exceeded the maximum levels; these were mostly found in tuna.

Differences in the respective countries' notification profiles, as well as differences in what they consider attributable to the "other causes" category, make it very difficult for exporters and exporting countries to understand the reason for a particular rejection or detention by an importing country. This has a consequential impact on the corrective actions to be taken.

Although a recommendation was made in FAO Fisheries Technical Paper No. 473 in 2005, suggesting that countries should develop publicly available data on rejections and detentions, this has not yet been implemented by most countries. The only easily accessible data sets therefore remain those described above.

Following this session, participating countries made a series of recommendations, as follows.

***Workshop recommendation 1:***

**FAO should work with its Members to encourage and facilitate the development of comprehensive and publicly available rejection and detection portals.**

***Workshop recommendation 2:***

**FAO should work with its Members to encourage and facilitate the posting of all border rejections for all reasons (e.g. documentation, labelling), which may fall under the responsibility of other national competent authorities (e.g. standards organizations, consumer rights organizations).**

***Workshop recommendation 3:***

**FAO should work with its Members to encourage and facilitate the development of common terminology and/or classification for the causes of border rejections, in particular for rejections under the "other" category.**

## IMPORT SYSTEMS

During the workshop, countries were asked to present their food safety regulation frameworks, which provide the basis and authority for operating a food import control system that protects consumers and ensures fair practices in food trade.

Participants explained how their systems provide appropriate levels of protection, with the country establishing a sanitary measure to protect human life or health within its territory.

### Canada

In 2019, Canada implemented a new food safety law and its associated regulations named the *Safe Food for Canadians Act* (SFCA) and the *Safe Food for Canadians Regulations* (SFCR). The SFCA and SFCR replaced older, commodity-based legislation and now provide a consistent approach across all commodities. The CFIA is responsible for the administration and enforcement of the SFCA and the SFCR for all food, whether imported, exported or traded inter-provincially.

The SFCR requires that importers:

- have a licence;
- have a preventative control plan, with some exceptions;
- ensure the foreign supplier is manufacturing, preparing, storing, packaging or labelling the food as required;
- investigate potential health risks, non-compliances and have processes in place for complaints and recalls;
- meet traceability labelling requirements and have traceability records identifying both the source of the food and its recipient.

### *Import process at the border*

In Canada, the Canada Border Services Agency (CBSA) is responsible for all decisions relating to the admissibility of food presented for import into Canada.

Under the SFCR, importers are required to provide information about each shipment to CFIA.<sup>1</sup> The CFIA National Import Service Centre processes the documentation and data sent by importers or their representatives to verify that the food meets Canadian requirements; thereafter, it makes a recommendation to the Canada Border Services Agency on a decision for food shipments, either:

- refusal: if the product is not approved for importation in Canada; or
- rejection: the documentation submitted is rejected if the required documentation is not compliant (e.g. illegible or missing information); or
- release with inspection: if the documentation is compliant and the product must be inspected by the CFIA; or
- release without inspection: if the documentation is compliant and the CFIA will not conduct an inspection.

The shipment is released to the importer once it has been cleared by CBSA.

When additional control of a specific imported commodity is necessary, CFIA may issue a border lookout. As part of this process, the CFIA is notified of any shipments meeting certain criteria – such as a specific product, a specific country of origin, a specific producer / exporter / importer or a combination thereof. In such cases the shipment is to be held at its first destination for the necessary inspection and/or sampling requirements.

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<sup>1</sup> Importers/brokers consult the CFIA Automated Import Reference System (AIRS), 2020 to determine the import requirements for CFIA regulated commodities.

### ***Pre-border/in-country controls***

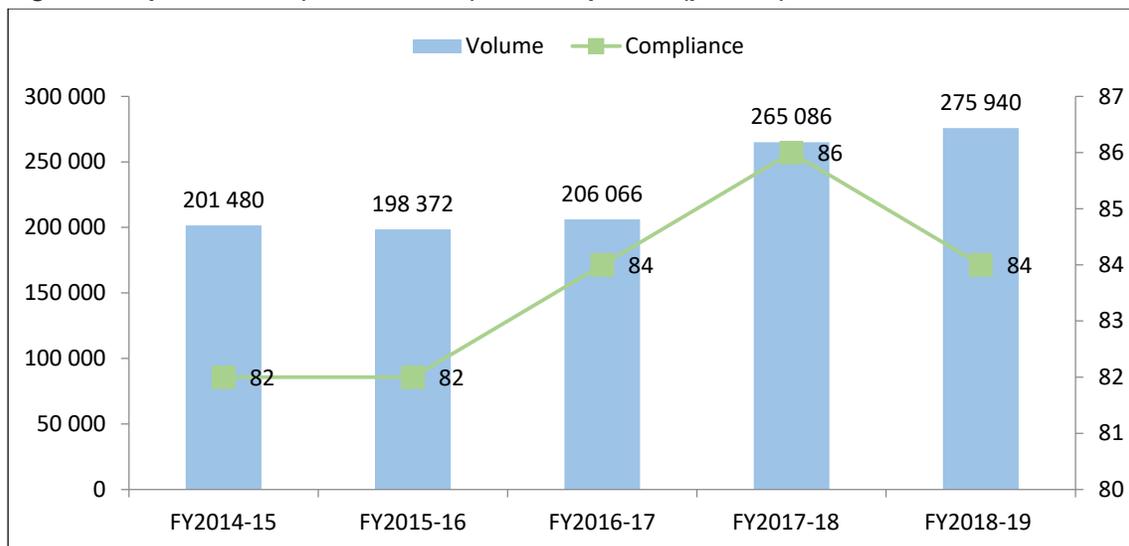
In addition to border action, Canada also implements pre-border and in-country controls. With respect to pre-border activities, Canada participates in the development of international rules and shares information with counterparts in foreign countries. The CFIA also delivers activities to enhance the safety of imported foods by proactively addressing food safety risks at the source, including foreign country audits and assessments, foreign establishment verifications and technical assistance. With respect to in-country controls, the CFIA will verify compliance with regulatory requirements, including the inspection of importers to assess both their preventive control plan and the product itself. In the case of fish and seafood products, sampling and testing of products may occur at either the importer or retail point. Where there is non-compliance, the CFIA will take appropriate enforcement actions (e.g. seize and detain, order to remove or dispose, licence suspension/cancellation, prosecution etc.).

The frequency and scope of inspections are determined as part of the programme's development and management, while taking into account:

- current programme design activities and effectiveness;
- results from risk models;
- disability-adjusted life years (DALYs) estimate for sub-commodities and economic impact (if available);
- historical rejection, sample and inspection results;
- substances approved, not approved and banned for use in Canada and exporting countries, as well as the known use patterns of these substances;
- information from other countries/government departments, foreign audits and inspections;
- risk intelligence, environmental scans, scientific research, information on emerging substances of concern, media reports;
- consumer complaints, recalls;
- risk assessment exercises.

The top 10 countries exporting fish to Canada are: the United States of America (19 percent), China (12 percent), Greece (10 percent), Viet Nam (6 percent), Thailand (6 percent), Peru (6 percent), Chile (3 percent), Mexico (3 percent), Honduras (3 percent) and Brazil (3 percent), with 29 percent being sourced from other countries. The overall fish import volume and compliance with regulatory requirements is shown in the graph below.

**Figure 6. Import volume (metric tonnes) and compliance (percent) in Canada**



Sources: Electronic Data Interchange (EDI) and Laboratory Sample Tracking System (LSTS), 2019.

## China

The General Administration of Customs of the People's Republic of China (GACC) is the responsible organization for import control.<sup>2</sup> The GACC has 47 subsidiary organizations. The responsibility for the inspection of imported fish is spread across several departments, including the Department of Port Control, the Department of Risk Management and the Bureau of Import and Export Food safety. However, within the GACC the Bureau of Import and Export Food Safety has the overarching responsibility for imports. The Chinese inspection system has three phases: pre-entry, Port inspection, supervision after entry (i.e. in-country).

The first phase involves an assessment of the exporting country's food safety system by GACC. Following the assessment, the GACC will post the list of acceptable countries and fish products on its website. Exporting food businesses need to be registered with the GACC, as does the importing agent, while consignments must be accompanied by an official certificate and aquaculture products need quarantine approval.

Port inspection is the central phase. The port inspection primarily involves a review of documentation, onsite inspection and laboratory tests. Local custom officials verify the documentation including the appropriate certificate, ensuring it originates from a registered establishment and relates to acceptable fish species. There may be onsite verification including visual and sensory inspection, and laboratory analysis, as required.

In the third phase, after entry or in country, the focus is on review and recall systems.

The GACC uses risk assessment to develop its annual sampling and monitoring plan, which takes into account data from laboratory tests, trade data, national standards etc. The annual plan identifies the fisheries products to be sampled and the analysis to be undertaken; it is then implemented by local port officials.

### *Workshop recommendation 4:*

**FAO should work with China on developing a detailed document outlining the importation procedure to assist exporting countries and, if possible, developing a process to publish Chinese rejection data.**

## Japan

The importation of fish and fisheries products is very important to Japan as a country, given that in 2018 it had a seafood self-sufficiency rate (based on calories) of 60 percent. In 2018, Japan imported about 34 tonnes of food, of which about 2.2 tonnes were fishery products.

Several organizations are responsible for providing oversight on imported fish in Japan. The Food Safety Commission is responsible for risk assessment, under the Food Safety Basic Act. The Ministry of Health, Labour and Welfare (MHLW) is responsible for food hygiene and safety under the Food Hygiene Act. The Ministry of Agriculture, Food and Fisheries is responsible for agriculture, fishery and livestock, and the Consumer Affairs Agency (Government of Japan) is responsible for food labelling under the Food Labelling Act.

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<sup>2</sup> The GACC also includes the responsibilities of the General Administration of Quality Supervision Inspection and Quarantine of the People's Republic of China (AQSIQ).

***Workshop recommendation 5:***

**FAO should work with Japanese officials to obtain information on rejections by the Consumer Affairs Agency (Government of Japan) that are not currently captured in the annual analysis carried out by FAO and posted on the Globefish website.**

Every year, Japan develops an Imported Food Monitoring and Guidance plan. The plan includes the priority items for monitoring and inspection, the promotion of food safety measures in importing countries, and guidance for importers on voluntary food safety controls. Japan consults on the annual draft plan before it is finalized and implemented.

The system for imported fish in Japan operates pre-border, at the border and within Japan. In order to assist exporting countries, Japan provides information on its import requirements to the importers directly and via embassies in Tokyo, as well as providing technical support to foreign governments to enhance their monitoring systems (e.g. laboratory support). They also publish the Food Monitoring Plan as well as its results in English. Where there are specific issues with imported fish that present a high risk of non-compliance, Japan will hold bilateral talks with competent authority of the exporting country (e.g. through embassy in Tokyo) to gather data and seek corrective measures; they may also undertake offshore inspections..

For “at-border” decisions, Japan has 32 quarantine stations to submit import notifications of food and related products, 6 quarantine stations with laboratory divisions, and 13 quarantine stations providing consultations on importing food and related products. Importers must provide the MHLW with the information online or by hand, including:

- name and address of the importer;
- product name, quantity, and weight of the foods;
- names of additives used in the foods and related products;
- raw materials, production methods, and processing methods of processed foods;
- identification of genetically GMOs/IP handling;
- components of used food additives;
- materials used in equipment, containers and packages, and toys;
- occurrence of cargo accidents and other related matters.

Food safety inspectors examine notifications for their conformity to the standards and criteria of the Food Hygiene Act, and where a food has a high probability of violations, further measures (e.g. inspection orders) are applied. The MHLW monitoring plan has established rules for an increasing level of enforcement measures.

Where a food has a low probability of violation/non-compliance, the monitoring plan is applied, associated with measures to promote food safety with importers (e.g. pre-import consultation, building awareness through seminars, etc.). During monitoring an inspector will carry out an onsite inspection and collect a randomly selected sample that is commensurate with testing/analysis and the size of the consignment.

As the probability of non-compliance increases, so does the inspection intensity. The first step involves an increased frequency in monitoring, followed by inspection orders, and for the most serious issues an import prohibition. Under inspections orders the imported food is held, tested and only released once test results indicate compliance. When a violation is detected involving acute health risks (e.g. DSP, STEC), inspection orders are implemented immediately, without the intermediate step of increased monitoring.

Order inspections are lifted once the issue in the exporting country has been addressed (i.e. no violations for two years, or no violations in 300 inspections for one year). The increased monitoring is lifted once there have been no violations for one year, or no violations in 60 inspections.

In short, the import programme is partially risk-based and partially reactive. Several key figures below provide an overview of the activities of the 2018 Imported Foods Monitoring and Guidance Plan:

- Number of notification cases: 2 482 623 / weight: 34 172 567 tonnes;
- Number of inspection cases: 206 594 (Inspection rate: 8.3 percent);
- Number of monitoring inspection cases: 56 036;
- Number of order inspection cases: 60 373;
- Number of voluntary inspection cases: 91 834;
- Total number of violations: 780 (running total 813 cases), which accounts for 0.03 percent of all notifications.

## New Zealand

New Zealand's top fish imports include tuna and other fish preparation from Thailand, frozen shrimps and prawns from Viet Nam, mackerel and other fish from China, and salmon from the United States of America.

New Zealand recognizes that most countries are striving to incorporate risk-based systems and that the availability of new technology platforms provides the ability to ensure that information is whole, accurate, timely and shared. As part of its system, New Zealand implements risk management activities pre-border, at the border and post-border, by targeting "high risk" foods based on the trader's record,<sup>3</sup> the type of food and its origin. The importer is responsible for confirming the safety and suitability of the food, and that it complies with the labelling requirements of the Australia and New Zealand Food Standards Code. Importers also need to ensure safe handling, storage and transport, keeping good records for traceability, and be able to recall food that is not safe or suitable.

New Zealand designates imported fish and seafood according to three distinct classes:

- **High Regulatory Interest (HRI)** food is imported food that presents an increased risk to human health, based on the food's inherent nature and the hazards associated with it, as well as the nature of its processing or handling, or the nature of the food safety controls in the country of origin. Examples include histamine-susceptible fish and fish products, ready-to-eat chilled, smoked fish and smoke-flavoured fish, ready-to-eat crustacea, bivalve molluscan shellfish and puffer fish.
- **Increased regulatory interest (IRI)** food is imported food for which there is uncertainty or concern regarding its safety or suitability, though not all will require specific food safety clearance.
- **General clearance** Low regulatory interest (LRI) foods are those where hazard evaluation indicates a minimal risk of human illness and specific clearance procedures are not required.

Food may be categorized as IRI based on accumulating hazard-based information at the border or through the gathering of intelligence which indicates an increased risk associated with a particular food or source: this usually results in tightened or additional border controls for a defined period. Changing between HRI, IRI and LRI categories occurs in a range of scenarios including a food-safety event, a risk-based review of a food's status, compliance history at the border, etc.

All consignments of HRI fish and seafood not from listed countries are sampled and tested. Where an importer has been issued a "New Zealand Importer Assurance" it will reduce clearance requirements. In other cases, clearance of HRI foods may include:

- official certification from listed countries;
- evidence that the consignment is from a specified country or region as listed in the Schedule;

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<sup>3</sup> New Zealand has defined the term "importer" as the owner/person responsible for the import consignment, which may be referred to as a food trader in guidance material. A food business is the registered facility that handles the food once it enters the country.

- official certificate or manufacturer's declaration, as required in the Schedule;
- sampling and testing that meets clearance requirements, as in the Schedule.

***Workshop recommendation 6:***

**Countries should consider adopting terms such as high, increased or low regulatory interest to incorporate the concepts of risk, as well as the concepts of confidence in exporting countries or importers.**

In addition, New Zealand has implemented targeted sampling at the border, the features of which are outlined below:

- customs consignment data are entered into FoodNet for sampling allocation;
- level of sampling is largely spreadsheet-based and carried out by the Target Evaluation Team;
- decisions on how often consignments from a specific supplier/importer are tested is up to the Food Safety Officer;
- sampling rate is the number of FoodNet lines sampled/consignments;
- sourcing rate is the number of different combinations of importer, supplier country of origin and tariff/consignments;
- diverse sources of an HRI commodity (e.g. sardines) drive up sampling rates.

***Enhanced risk-based inspection***

New Zealand is currently working to improve its risk-based system by developing a Risk and Intelligence System (RIS), with the aim of ensuring that the best information is available to *all* stakeholders. This means that in addition to current risk-based measures, which are primarily based on the risk profile of the type of seafood and the country of origin, it will also include the importer's/trader's record of compliance.

Implementing the RIS will involve a high level of cooperation and data-sharing between post-border, at-border and pre-border inspection activities. Using a holistic data framework, it will integrate Customs and New Zealand Food Safety (NZFS) data, monitoring food importer registration status electronically, thereby reducing the need for manual checking. This approach will provide a full understanding of each 'entity' and its complexity. For instance, a single entity can be an importer, manufacturer and exporter with several regulatory interfaces, as well as associations with other entities. Information on entities involved in the rejection or recall of imported food can be made available to improve risk profiling at the border or pre-border.

The RIS will also include collaboration with international government agencies on food safety and fraud in order to achieve a better understanding of the motives behind non-compliant and fraudulent behaviour, while gaining insights on consumer behaviour. The systematic collection and analysis of rejections and alerts from overseas sources is a key opportunity for effective risk profiling pre-border and targeted border inspection.

**European Union**

During the workshop, presentations were made by European Union representatives from Italy and Spain: these concerned both the more general European Union importation process as well as the specific measures implemented by Italy and Spain within European Union legislation.

***Italy***

In Italy there are 25 Border Inspection Posts (BIPs),<sup>4</sup> 8 airports and 17 seaports (of which 22 can inspect animal products and 3 for live animals). In the course of 2018, there were over 35 000 fisheries consignments imported from over 66 countries. Some consignments contained only one commodity,

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<sup>4</sup> In December 2019, the 25 BIPs will be reconfigured as 29 Border Control Posts (BCPs) with new responsibilities, not only for animals and products of animal origin but also for food and feed of non-animal origin and food contact material.

while others contained different fisheries commodities (e.g. fish, crustaceans). Overall, 48 percent of consignments were subject to physical checks and 4 percent were subject to laboratory tests. From 2014 to 2018, the rate of rejections (i.e. consignments not admitted) was in the range of 0.2 to 0.3 percent. The reasons for the rejections included problems with hygienic conditions (11 percent), laboratory tests (11 percent), documentation (32 percent) and other reasons (46 percent).

### ***Spain***

In Spain there are 26 BIPs. In the course of 2018, a total of 191 278 consignments of food products were imported into the country, of which 44 257 were fishery and aquaculture products. A total of 878 consignments were rejected, of which 479 were fishery and aquaculture products. This accounts for 54.5 percent of total rejections.

The reasons for the rejections included: certification problems (13 percent); origin in non-approved establishment (4 percent); documentation issues (29 percent); health mark issues (15 percent); hygiene issues (19 percent); chemical contamination (5 percent); and other issues (15 percent).

### ***European Union importation processes***

European Union legislation only allows the importation of live animals and animal products if they are subject to veterinary checks at the BIPs.

### ***Import process at the border***

In the European Union, the business operator provides data on a consignment through the TRACES programme. The BIPs review the documentation provided to verify it and also conduct identity checks. Where required, and based on the national monitoring plan, the consignment may also undergo laboratory analysis.

Once the verification is complete, the data is entered into TRACES and a Common Health Entry Document (CHED) is issued, with a decision as to whether the consignment is acceptable for the internal market or not. Where applicable, a RASFF is triggered by the TRACES programme.

TRACES is a computerized platform for the notification, certification and control of consignments from countries outside the European Union. It digitizes the whole certification process and its related procedures. There are about 30 000 users from more than 80 countries that connect the European Commission, BIPs, Food Business Operators, National Competent authorities, and local and regional veterinary units. With this in mind, TRACES ensures:

- **Traceability**: monitoring movements, both within the European Union and from non-European Union countries.
- **Information exchange**: enabling trade partners and competent authorities to obtain information on the movements of their consignments easily, while speeding up administrative procedures.
- **Risk management**: reacting rapidly to health threats by tracing the movements of consignments and facilitating the risk management of rejected consignments.

At the BIPs, there are three possible checks:

1. **Documentary** – this means the examination of the veterinary certificates or veterinary documents, or other documents accompanying a consignment. Each consignment is subject to a documentary check.
2. **Identity** – this means a visual inspection to ensure that the veterinary certificates or veterinary documents or other documentation provided under veterinary legislation match the product itself. Each consignment is subject to an identity check.

3. **Physical** – this means verification of the product itself, which may include checks on packaging and temperature, as well as sampling and laboratory testing. The purpose is to verify the conditions and means of transportation, as well as to identify breaks in the cold chain, the real weight of the consignment, the packaging, labelling, general hygiene and, if necessary, laboratory checks.

The European Union has established a minimum frequency rate for physical checks of imported food. The selection of consignments is required as and when there are mandatory checks in place, in the event that a risk has already been identified or as part of an ongoing monitoring programme. The European Union also has a programme of enhanced or reinforced checks that is implemented when a test reveals the presence of a hazard. Under the programme, the next ten consignments that originate from the same establishment are detained at customs pending testing results. The reinforced checks continue until there are ten satisfactory tests. After three more failed tests all consignments from that origin will be tested until the issue is resolved.

All testing results are entered into the European Union TRACES database, which is available at all European Union BIPs. Controls under the reinforced checks may occur at any of the European Union BIPs and, irrespective of which BIP receives the consignment, the TRACES programme will notify the veterinary inspector that the consignment is subject to a reinforced check. All costs for the tests are charged to the importer, who is responsible for the consignments.

In addition to the monitoring and reinforced checks programme, the European Union has also established a programme of safeguard measures. These are to be applied where a problem exists and has not yet been addressed by the exporting country (e.g. following unsatisfactory laboratory tests, or an audit that identifies shortcomings in the control system). The European Union lists products under the safeguard measures as well as responsibility for costs (i.e. consignor and/or consignee) on its website (European Commission, 2020).

Each Member State establishes a national monitoring plan to monitor conformity with European Union legislation. The consignments tested are generally released to the market and the cost is borne by the national competent authority. The national plan is characterized as risk-based and harmonized across BIPs to minimize the potential to distort trade. The monitoring programme establishes the number of samples, the frequency of sampling, the type of analysis for the product, hazard and country of origin; the programme itself is established by each BIP. The criteria adopted by the BIPs take into account the number of imported consignments, the risks associated with the products, previous laboratory tests results, previous Rapid Alert System on Food and Feed (RASFF) notifications, reports of European Commission audits of the national control programme in the country of origin, as well as the reliability and guarantees provided by the importer).

## WORKSHOP DISCUSSION AND CONCLUSIONS

FAO Fisheries Technical Paper No. 473 provided broad recommendations on import systems for fish and seafood, urging governments to move towards a risk analysis approach from “farm or sea to table”. On a global scale, most countries are still transitioning towards fully “risk-based” import food control systems, and each country is at a different stage in that implementation process. This workshop provided another opportunity to share experiences and best practices.

Some of the recommendations outlined in the Technical Paper pertaining to FAO and Codex guidance on risk-based imported food programmes have been undertaken; others, pertaining specifically to risk-based imports for fishery and aquaculture products, still have to be completed. The Technical Paper also included recommendations for capacity building in developing exporting countries.

### *Workshop recommendation 7:*

**To assist countries in sharing best practices, it is recommended that risk-based imported fish controls be discussed at the next World Seafood Congress and/or within the International Association of Fish Inspectors. In addition to sharing best practices by importing countries, it would also be useful to have a capacity-building workshop with exporting countries so as to understand risk-based import programmes and to provide an opportunity for the exchange of information and best practice.**

This should also include the commitment to review inspection systems for non- health and safety issues (e.g. quality defects, economic fraud), which are legitimate concerns for importing countries but for which border inspections may not be the best control.

Given that the importing countries that participated in the workshop noted that they are in the process of improving their risk-based import system, they should be in a position to apply a common set of principles to a national system for imported fishery and aquaculture products, and to implement best practice that is relevant to their legislative environment, funding base and level of technical expertise. In this regard, public health goals need to be embedded within wider system goals such as safety, authenticity and consumer expectations such as sustainability, as well as the overall performance of the system in terms of efficiency and cost-effectiveness.

Three key principles, derived from the Codex and FAO documents, were used to focus discussion:

### **1. The legislative base for food control at a national/federal level should be horizontal in nature and incorporate risk analysis as a primary component**

During the workshop the participants noted their inclusion of risk analysis as one of the generic components of food legislation, some of which are horizontal, others of which are commodity-based. This approach, together with the WTO SPS provision that control measures should be proportionate to the risks to human health, means that a risk-based system should allocate inspection resources where they have the best chance to mitigate risks. Risk assessment and risk prioritization capability across *all* food sectors should be an input in the application of risk management measures.

### **2. Control measures should be allocated across the “farm or sea to table” continuum, relative to their proportional impact on minimizing risks to human health and achieving other regulatory goals**

Participants noted that they have implemented import food control systems that operate across the “whole of the food chain”, whether pre-border, at the border or post-border. These systems are at different stages of development and considering the various criteria as inputs to risk management decisions. Some have indicated that they have strong pre-border risk management controls (e.g. the European Union) while others are focusing on post-border controls (e.g. Canada). For the most part, countries noted that their specific product standards and guidelines for the import of fishery and

aquaculture products are based on risk assessment to the extent possible, e.g. *Listeria* standard and MRLs. This provides the basis to guide inspection measures at the border.

While the identified risks are key components, there are other important factors to consider such as country of origin and the performance of the importer, as evident in the European Union and New Zealand border activities. For example, in New Zealand, this comprehensive approach is expressed in the terms *high regulatory*, *increased regulatory* or *low regulatory* interest.

The importer has the primary responsibility for food safety and suitability, including implementation of good import practices and demonstrating product compliance. Formalizing the role of the importer (e.g. registration, licencing, approvals) allows their compliance performance to be recognized by a decreased number of import inspections, providing their compliance history is positive.

Monitoring and surveillance activities (e.g. national monitoring programmes) should consider all issues, including arrangements of mutual recognition or equivalence.<sup>5</sup> Confidence in the exporting country's food control system (e.g. through certification or other arrangements) should be recognized through a decreased number of import inspections.

Integrated information management throughout the food control system (including international information systems) is an essential component of a fully informed, risk-based system.

### **3. Risk categorization should provide greater confidence that risks associated with the food are mitigated by effective controls**

The presentations during the workshop identified the broad range of issues that countries must address within their imported food programme. To the extent that they exist and are available, countries use risk assessments from international, regional or national organizations. Nevertheless, they have also shown a commitment to using a risk-based, evidence-based approach for imported food, and some have adopted a risk categorization approach. This would ensure that food products are categorized as posing a high, medium or low risk based on the potential for causing illness or harm, as well as taking into account the controls exercised by the food business and/or the competent authority in the exporting country and/or the importer. As a result of risk categorization, importing countries can have evidence and therefore greater confidence that the risks associated with the food are mitigated by effective controls.

Risk categorization is a key component of a risk-based imported food system, which drives inspection frequency and intensity. The approach to risk categorization is being developed by different countries and may therefore take different forms. The policies derived from risk categorization may also differ, thus driving differences in inspection types, frequency and intensity.

#### ***Workshop recommendation 8:***

**In order to assist countries to develop both a common approach to risk categorization and a common application policy, FAO may consider holding an expert working group on risk categorization for fishery and aquaculture products.**

#### ***Workshop recommendation 9:***

**In order to assist countries to understand the main issues when exporting to the European Union, FAO may consider developing a survey addressed to staff from European Union border inspection posts.**

#### ***Workshop recommendation 10:***

**In order to assist countries to understand the main issues when exporting, FAO may consider developing a survey for industry exporting to the main markets.**

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<sup>5</sup> N.B. Listing of countries as having robust systems is different to full equivalence.

## LIST OF WORKSHOP RECOMMENDATIONS

The following lists all the recommendations made in the report:

1. FAO should work with its Members to encourage and facilitate the development of comprehensive and publicly available rejection and detection portals. (Recommendation made under the Border rejections section, page 8).
2. FAO should work with its Members to encourage and facilitate the posting of all border rejections for all reasons (e.g. documentation, labelling), which may fall under the responsibility of other national competent authorities (e.g. standards organizations, consumer rights organizations). (Recommendation made under the Border rejections section, page 8).
3. FAO should work with its Members to encourage and facilitate the development of common terminology and/or classification for the causes of border rejections, in particular for rejections under the “other” category. (Recommendation made under the Border rejections section, page 8).
4. FAO should work with China on developing a detailed document outlining the importation procedure to assist exporting countries and, if possible, developing a process to publish Chinese rejection data. (Recommendation made under the Import Systems section, page 11).
5. FAO should work with Japanese officials to obtain information on rejections by the Consumer Affairs Agency (Government of Japan) that are not currently captured in the annual analysis carried out by FAO and posted on the Globefish website. (Recommendation made under the Import Systems section, page 12).
6. Countries should consider adopting terms such as high, increased or low regulatory interest to incorporate the concepts of risk, as well as the concepts of confidence in exporting countries or importers. (Recommendation made under the Import Systems section, page 14).
7. To assist countries in sharing best practices, it is recommended that risk-based imported fish controls be discussed at the next World Seafood Congress and/or within the International Association of Fish Inspectors. In addition to sharing best practices by importing countries, it would also be useful to have a capacity-building workshop with exporting countries so as to understand risk-based import programmes and to provide an opportunity for the exchange of information and best practice. (Recommendation made under the Workshop discussion and conclusions section, page 17).
8. In order to assist countries to develop both a common approach to risk categorization and a common application policy, FAO may consider holding an expert working group on risk categorization for fishery and aquaculture products. (Recommendation made under the Workshop discussion and conclusions section, page 18).
9. In order to assist countries to understand the main issues when exporting to the European Union, FAO may consider developing a survey addressed to staff from European Union border inspection posts. (Recommendation made under the Workshop discussion and conclusions section, page 18).
10. In order to assist countries to understand the main issues when exporting, FAO may consider developing a survey for industry exporting to the main markets. (Recommendation made under the Workshop discussion and conclusions section, page 18).

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## ANNEX 1

### RECOMMENDATIONS FROM FAO FISHERIES TECHNICAL PAPER NO. 473 (FAO, 2005)

#### Food safety

##### *Recommendation 1:*

Governments should commit to examining their inspection procedures and move towards the risk analysis approach where consumer health is at risk along the food chain from “farm or sea to table”. This should ideally be done through sharing experiences between countries and communicating best practices to other countries. This would assist in harmonizing procedures and promoting equivalence schemes between importing regions. The Codex Alimentarius Commission should be provided with the means to strengthen its role in this process, building on the work of the Codex Committee on food import and export inspection and certification systems (CCFIEICS) and the Codex Committee on fish and fishery products (CCFFP).

##### *Recommendation 2:*

The FAO Committee of Fisheries Sub Committee on Fish Trade should be asked to endorse further work by FAO in better understanding the impact of border actions on fish trade, allowing targeted recommendations for improved trade flow between exporting and importing nations.

##### *Recommendation 3:*

Governments and international bodies (World Health Organization, FAO and donors’ community) should commit to continuing, and indeed expanding, the work into risk assessment of foods to provide the international framework for the assurance of food safety.

#### Consumer protection

##### *Recommendation 1:*

Governments should commit to examining their inspection procedures with respect to quality defects (freezer burn, honeycombing, etc.) and economic frauds (net weights, species identification, etc.) and decide whether border control is the best place to detect these problems, building on the ongoing work of the CCFFP and the CCFIEICS.

#### Border control data

##### *Recommendation 1:*

All importing countries’ governments should follow the example of the European Union, United States of America, Japan and Canada in making their border case data available, preferably on the internet. This should include archive information going back for as many years as is possible, given data availability.

##### *Recommendation 2:*

Each record for a border action should preferably include at least the following data:

- date of action;
- country of origin of product (i.e. exporting country);
- importing country (for European Union only);
- company name;
- cause for action taken (e.g. cadmium, Vibrio, Salmonella, etc.);
- method of production (farmed or captured);
- species involved, including, ideally, the Latin name;
- product form involved (e.g. frozen, canned, smoked, etc.\*);

- action taken (re-export, destruction, sorting, re-packing, etc.);
- quantity of consignment;
- value of consignment (would be very useful, but could be commercially sensitive).

\* for the product field, general terms such as “processed” should be avoided and a more specific term used. Different interpretations of the word “processed” causes ambiguity. Again, the CCFPP definitions should be adopted when applicable.

***Recommendation 3:***

The data made available online need to be harmonized between websites and need to be presented in a form that is easily further analysed. The suggested format is to present the data record by record in a spreadsheet using the fields above, as a minimum. Useful other fields include a category field to supplement the species field, (crustacea, molluscs, cephalopods, etc.), the product field, (frozen/fresh, heat processed, cured, etc.) and the cause field, ( chemical, microbial, labelling, documentation, etc.) The terms used for the latter two need to be both defined and universally accepted.

**Exporting countries development assistance**

***Recommendation 1:***

International development agencies should continue to support developing nations in the production of high quality and safe fish and fish products. This effort should continue to focus on the basics (Good Hygiene Practice, Good Manufacturing Practice, Good Aquaculture Practice and HACCP) but also build capacity in the risk analysis approach to ensuring food safety.

***Recommendation 2:***

Exporting nations’ governments need to put, or keep, food safety as a priority for their food production both for domestic and exporting sectors and to expand support to the industry. Likewise, exporting companies need to continue to put food safety as their top priority in company business strategies.

## ANNEX 2

### WORKSHOP PROGRAMME

Fish and fishery products are among the world's most traded commodities, with about 35 percent of global fish production (live-weight equivalent) entering international trade. Each country has its own food inspection system at borders to ensure consumer protection. One of the greatest difficulties for exporters is the variety of inspection frameworks and requirements in their different markets. They face different import regulations and control procedures based on which seafood products can be rejected or detained, which has an economic impact. In order to promote harmonization and equivalent standards among seafood trading countries, the differences between fish inspection systems need to be analysed and studied, and risk assessment exercises better understood.

The Codex Alimentarius Commission is currently working to promote harmonization through different Codex Committees such as the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS), which has developed relevant Codex texts such as, the "Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food" and, "Guidelines for the Development of Equivalence Agreements Regarding Food Imports and Export Inspection and Certification Systems".

These documents aim to develop principles and guidelines for food import and export inspection, in addition to certification systems, with a view to harmonizing methods and procedures, which protect the health of consumers, ensure fair trading practices and facilitate international trade.

However, despite the existence of several Codex documents – the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) and the WTO Agreement on Technical Barriers to Trade (TBT) – the different profiles of the border rejections and detentions in major importing countries highlights that there is a substantial variation between border inspection frameworks for fisheries and aquaculture products. Therefore, it is important to understand these differences, why they exist and explore how feasible it is to move towards harmonization of border inspection protocols and procedures.

This meeting aims to provide an overview of the criteria for defining risk-based border inspection systems in major fish importing countries to have a better understanding of the different conditions based on which fishery and aquaculture products are rejected or detained. The meeting will guide the elaboration of a workshop report on risk-based fish inspection at borders and provide recommendations for harmonization of fish inspection systems at borders if possible.

#### *What is expected from participants?*

Participants will be asked to present data on rejections and detections of fishery and aquaculture products at borders, and the risk assessment exercises carried out to define border inspection systems in their respective countries, as well as to write a section of the workshop report on this topic. Participants need to bring their presentations in PowerPoint format and their own laptops to write their respective report sections.

#### **Day 1**

- 9.00 Opening
- 9.15 Introduction of participants
- 9.30 Introduction to the meeting (purpose) and background document
- 9.45 Developments on border control within the Codex Alimentarius
- 10.00 Analysis of border rejections (Canada, EU, Japan, US)
- 10.30 Coffee break
- 11.00 Introduction of Fish Rejections and Food Inspection System at borders (Canada)
- 11.45 Introduction of Fish Rejections and Food Inspection System at borders (China)
- 12.30 Lunch
- 13.30 Introduction of Fish Rejections and Food Inspection System at borders (Japan)

- 14.15 Introduction of Fish Rejections and Food Inspection System at borders (European Union - Spain)
- 15.00 Coffee break
- 15.30 Introduction of Fish Rejections and Food Inspection System at borders (New Zealand)
- 16.15 Introduction of Fish Rejections and Food Inspection System at borders (European Union - Italy)
- 17.00 Closing

**Day 2**

- 9.00 Summary of presentations from day 1
- 9.30 Discussion
- 10.30 Coffee break
- 11.00 Working time (to develop the country chapter)
- 12.30 Lunch
- 13.30 Working time (to develop the country chapter)
- 14.45 Coffee break
- 15.00 Presentation of the chapter (Canada)
- 15.20 Presentation of the chapter (China)
- 15.40 Presentation of the chapter (Japan)
- 16.00 Presentation of the chapter (European Union - Spain)
- 16.20 Presentation of the chapter (New Zealand)
- 16.40 Presentation of the chapter (Italy)
- 17.00 Closing

**Day 3**

- 9.00 Presentation of the background document
- 10.00 Discussions
- 10.30 Coffee break
- 11.00 Working time and assignments
- 12.30 Closing

**ANNEX 3**  
**LIST OF PARTICIPANTS**

**Experts**

**Canada**

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Canadian Food Inspection Agency

Victor Ramos  
Canadian Food Inspection Agency

**China**

Zhang Ming  
Import and Export Food Safety Bureau

**Italy**

Giuseppe Attanzio  
Ministry of Health

**Japan**

Hajime Toyofuku  
Ministry of Health, Labour and Welfare

**New Zealand**

Steve Hathaway  
Ministry for Primary Industries, Food Safety Authority

**Spain**

Ana María Sanz Fernández  
Ministry of Health

**Chairperson**

Mike Dillon  
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**FAO Secretariat**

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International Food Safety Consultant, FAO

The FAO workshop on risk-based fish inspection at borders was held to understand the key food safety standard compliance challenges when exporting fishery and aquaculture products; in doing so, it sought to guide future FAO work in the area of trade facilitation. Available data from some of the main importing countries was presented during the event and the differences between the rejection profiles analysed. Participating countries presented their food safety regulation frameworks, which provide the basis – as well as the authority – to operate a food import control system designed to protect consumers and facilitate fair practices in food trade. Participants explained how their respective import food control systems provided the level of protection deemed appropriate by the country, establishing safety measures that protected human life or health within a country’s territory. Participants recommended the application of risk-based imported fish controls and provided a set of recommendations to improve the reporting of import rejections, as well as recommendations to improve data analysis.

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