

**A STUDY OF THE TRADE IN SMOKED-DRIED FISH
FROM WEST AFRICA TO THE UNITED KINGDOM**



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A STUDY OF THE TRADE IN SMOKED-DRIED FISH FROM WEST AFRICA TO THE UNITED KINGDOM

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PREPARATION OF THIS DOCUMENT

A study of the United Kingdom market for West African smoked fish was undertaken in May and June 2000 in connection with:

- FAO Project TCP/NIR/8926 “Strengthening of Fish Quality Assurance” in Nigeria;
- FAO’s work on promoting sustainable development of artisanal fisheries;
- FAO’s work on promoting safety and quality of fishery products in domestic and export markets.

The study was commissioned by FAO’s Fish Utilization and Marketing Service (FIU) to the Natural Resources Institute (NRI) of the United Kingdom and was carried out by Mr Ansen Ward. It was edited by Mr Frans Teutscher of FIU.

Ward, A.

A study of the trade in smoked-dried fish from West Africa to the United Kingdom.
FAO Fisheries Circular. No. 981. Rome, FAO. 2003. 17p.

ABSTRACT

The quantity of smoked fish from West Africa entering the United Kingdom is estimated to be in the region of 500 tonnes per year with a retail value of £5.8 to £9.35 million. Approximately 120 tonnes arrives by airfreight, a significant proportion of the remainder is thought to be entering as accompanied baggage and product is also arriving overland from mainland Europe. Nigeria currently exports approximately 5 tonnes of smoked fish per month as airfreight - 60 tonnes per annum. Most of this is via Gatwick Airport. The other major exporting countries are Ghana, the Ivory Coast and Cameroon.

Approximately 1 in 4 consignments of air freighted smoked fish are detained for some reason at port of entry. Of these 70% are destroyed. This is approximately 17.5% of consignments and equivalent to 20 tonnes of product with a retail value of £240 000 to £390 000. The main reasons for detention are:

- Packaging is inadequate – re-used computer or TV boxes, in poor condition, newspaper or baskets are used for packing the fish.
- Insect infestation.
- Establishment number stapled on the box rather than written on.
- Health certificates not filled in correctly.
- Smoked fish included among other goods and not declared.

Draft best practice guidelines have been drawn up focusing on the control of insect infestation, mould growth, the use of correct packaging and the preparation and processing of necessary paperwork for export/import.

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1. INTRODUCTION

The study of the UK market for West African smoked fish was undertaken in support of FAO project “Strengthening of Fish Quality Assurance” (TCP/NIR/8926) in Nigeria. Output 5 of the project was the promotion of trade in traditional fishery products from the small-scale sector. The aim of the study is to characterise the smoked fish export/import trade focussing on the United Kingdom (UK) and to identify constraints to the trade, suggesting guidelines or recommendations to the project.

The study is of interest not only to Nigeria but also to other countries exporting traditional fishery products to Europe.

The study was conducted during May and June 2000. Primary data was derived from personal and telephone interviews with smoked fish importers and retailers in London, Environmental Health Officers at Heathrow and Gatwick airports and cargo clearing agents. Secondary data on smoked fish imports into the UK was also obtained.

2. PRODUCT AND ORIGIN

At the time of the study (May 2000) the bulk of smoked fish imports into the UK from West Africa were coming by air from Ghana, Nigeria, Côte d’Ivoire and Cameroon through Heathrow and Gatwick International airports. Product is also imported from other West African countries and East Africa. The bulk of product from Nigeria is via Gatwick, which receives almost daily consignments. At the time of writing, regular airfreight consignments were arriving into the UK from two EU approved establishments in Nigeria and one in Ghana.

Figures 1 to 4 show smoked fish on display for sale in London. Most smoked fish imported is of freshwater origin. The following is a list of the products and country of origin seen on sale in London during the study:



Figure 1: Various products on sale in street market



Figure 2: Smoked fish on display in London



Figure 3: Smoked sardinella ("herring")



Figure 4: Smoked sardinella ("herring")

Catfish	<i>Clarias</i> sp., head to tail with or without stick, Nigeria
Doctor fish	species unknown, pieces, Ghana
Christal fish	freshwater catfish, species un-known, whole head to tail, Ghana
Tilapia	whole, Ghana
Tilapia	pieces, Ghana, Nigeria
Heterotis	pieces, Nigeria
Capitain	species unknown, pieces
Barracuda	small, whole and head to tail, Côte d'Ivoire large, pieces, Ghana
Mackerel	head to tail, Côte d'Ivoire
Sardinella	'herring', whole, Côte d'Ivoire

The Nigerian catfish was typical of that produced in the Lake Chad region of the country. Calabar is another area of Nigeria from which the product is sourced. The sardinella seen on sale was typical of that produced in coastal Nigeria, Ghana and Côte d'Ivoire.

Data from the UK Tariff and Statistical Office of HM Customs and Excise for the last five years of imports of smoked fish from Africa is presented in Table 1. The data refers to imports of "other smoked fish including fillets" (EC commodity code 030549 80). This is one of nine codes related to smoked fish. The other codes refer to livers and roes; salmon; herring (*Clupea harengus*, *C. pallasii*); halibut; mackerel (*Scomber scombrus*, *S. australasicus*, *S. japonicus*); trout; and, eels.

Table 1. Annual recorded imports of smoked fish from Africa into the UK - 1995 to 1999

Country	1995			1996			1997			1998			1999		
	kg	Value (£)	£/kg	kg	Value (£)	£/kg	kg	Value (£)	£/kg	kg	Value (£)	£/kg	kg	Value (£)	£/kg
Senegal	400	1 499	3.75							147	911	6.2			
Côte d'Ivoire	575	5 462	9.50	1 140	774	0.68				3 975	236 869	59.59	9 342	10 760	1.15
Ghana	1 005	4 841	4.82	4 148	527 939	127.28	6 733	16 392	2.43	510	743	1.38	816	1 210	1.48
Nigeria	5 958	30 832	5.17	80	1 629	20.36	1 555	3 893	2.50				1 565	5 457	3.49
Sierra Leone							490	1 263	2.58						
Uganda							435	1 209	2.78	317	1 482	4.68			
Togo										800	684	0.86			
Cameroon										45	803	17.84			
Congo										220	49 951	227.05			
Total	7 938	42 634	5.37	5 368	530 342	98.80	9 213	22 757	2.47	6 014	291 443	48.46	11 723	17 427	1.49

Source: HM Customs and Excise Data from Abacus Data Services (UK) Ltd.

Table 1 shows that over the last five years recorded imports of smoked fish were around 8 tonnes per year and originated from seven West African countries and from Congo. About 37.5% came from Côte d'Ivoire, 32.5% from Ghana and 22.5% from Nigeria. Only Ghana showed imports every year, but especially in 1996 it is not clear what they were. The other countries exported on and off.

Research for this study indicates that the official data significantly underestimates both the level of official imports and of actual imports.

It may be that smoked fish imports from West Africa are recorded under a different code, one not related to smoked fish. It was not possible to verify this assumption during the study. Furthermore, there are clearly a number of inconsistencies regarding the value data in Table 1. Price per kilogram is exceedingly high in some cases. It has not been possible to determine the reasons for these.

The actual quantity of smoked fish that is entering the UK by formal and informal means is much larger and could be as much 500 tonnes per year or over 60 times (!) as high as the officially recorded quantity under EC Commodity Code 030549 80 “Other smoked fish including fillets”. See section “Indicator of Market Size in UK”.

Whereas supply of smoked fish is said to be seasonal, demand for product remains constant throughout the year. Peak supply coincides with peak landings in the countries of origin. For example in Ghana peak landings occur in August and September, the lean season being January to May. During the latter period retailers in London may run short of fish. Observations during fieldwork in London in May 2000 revealed that many retailers were well stocked with product.

3. PRICES

At the time of the study the wholesale price of smoked fish London was £5.50 to £7.70/kg, depending on supply. Price does not appear to be product specific, although herring is sold at a cheaper price of £2.20 /kg.

Table 2 shows data for wholesale and retail smoked fish prices for May 2000. These were derived from interviews or visits to the respective outlet.

Table 2. Smoked fish prices in London, May 2000

Product	Price (£/kg)	Place	Comment
Various	5.50 – 7.70	Fovitor International Ltd, London	Wholesale
Herring	11.60	Abidjan Market, Camberwell, London	Retail
Frozen smoked capitain	11.60	“	“
Frozen smoked mackerel	11.60	“	“
Various products whole and pieces	15.40 – 8.70	Brixton Market, London	“
Various	13.20	Bantama Market, Leyton, London	“
Small pieces of fish	22.00	Ghana House, Brixton Market	“

(£1 = US\$ 1.6)

4. DISTRIBUTION CHANNELS

There are three main ways in which smoked fish enters the UK. These are by airfreight, as accompanied baggage or overland from mainland Europe.

5. AIRFREIGHT

There are thought to be 20 to 30 key importers of smoked fish in the UK, all are based in London. These include: CA Foods, Fovitor International, BIMS African Food Store. These regular importers typically deal in a variety of African foodstuffs such as gari, fufu, vegetables and palm oil. There are also a large number of small-scale importers who bring

smoked fish and other products in as airfreight on an ad hoc basis. These are not seen as regular importers.

British Airways, Swiss Air, Sabena, Alitalia, KLM and Ghana Airways all carry smoked fish as airfreight.

Smoked fish arrive packaged in cardboard or polystyrene boxes. Each box contains between 12 – 25 kg of smoked fish. Boxes of herring are typically around 10 kg. Figure 5 shows typical packing of foodstuffs into air cargo containers. Figure 6 shows a consignment of smoked fish from Ghana recently arrived at Gatwick Airport.

After arrival at the airport the boxes are taken to the customs shed for inspection by customs and the Port Health authority (see Sanitary Controls).

Consignments are either cleared by agents through Customs and Port Health, or by the importer themselves, usually within 24 hours of arrival in the UK, unless Customs or Port Health identify any problems and detain the consignment. The main clearing agent for smoked fish arriving into Heathrow is Air Marine Ltd and at Gatwick the main agent is Kingscoat. Once cleared by an environmental health officer from Port Health, the consignment can be shipped to any other EU country without undergoing another port health inspection. Hence some smoked fish arrives in the UK by air after having been cleared by port health in another EU country, e.g. Belgium.

Assuming the consignment is not detained it will be released to the importer. He or she will collect the fish from the airport and store it, releasing it to retailers as required. The fish will remain in storage for an average of two weeks. The store where it is kept is typically not temperature controlled. The fish is delivered to retailers by the importer using a van. Some importers also re-export smoked fish wholesale to mainland Europe (France, Belgium).

6. ACCOMPANIED BAGGAGE

Smoked fish is brought into the UK in the accompanied baggage of passengers arriving on flights from West Africa. Often based in West Africa these people sell to traders in London without paying appropriate freight, handling and inspection charges although such product is also used for home consumption. The product may or may not originate from an EU authorised processing plant. According to one airport official this trade was “huge and difficult to police”. A random inspection of one flight from West Africa by authorities two years ago revealed 500 kg of undeclared smoked fish and meat in passengers’ luggage. A



Figure 5: Foodstuffs waiting for inspection



Figure 6: Smoked fish from Ghana

more recent “swoop” on a plane from Nigeria uncovered a whole freshly slaughtered goat as well as smoked fish and bushmeat. Research for the study indicates that the volume of product entering the UK in accompanied baggage is potentially as great, if not greater, than the volume entering the country as formal air freight (see Indicator of Market Size in UK).

7. OVERLAND FROM EUROPE

One importer interviewed has found air freighting to be expensive and as a result is now buying fish in France at the Chateaux Rouge Market in Paris 18, a large ethnic food market. He sells palm oil in France and purchases smoked fish with the proceeds, brings it back to London and sells it from his shop and to retailers. Smoked fish is imported into France from Côte d’Ivoire, Togo and Senegal.

8. COMMERCIAL PRACTICES

Regular importers order from suppliers by telephone or fax. Two forms of payment are practised: consignments are paid for in advance or after the consignment is sold. According to one importer, when paying in advance the risk of receiving sub-standard product is increased

Favoured methods of payment are via FOREX bureau transfers or relatives and friends carrying cash back to suppliers. A number of grocery retail shops also facilitate payment by offering money transfer facilities. Transfers from UK high street banks tend to be slow and not reliable.

Less is known of the small-scale irregular importer’s practices. Although, some appear to sell their consignments in order to cover the cost of their air tickets.

9. MARKET CHARACTERISTICS

The majority of smoked fish is sold to consumers via Afro Caribbean grocery shops and Afro Caribbean restaurants in London. Some importers have their own grocery shops. Retailers are concentrated in certain areas of London such as Brixton, Peckham, Dalston in the south and Finsbury Park in the north. There are six retailers in Brixton Market alone, four run by Nigerians, one by Ghanaians and one by Sierra Leoneans.

Retailers display product un-packed alongside vegetables, gari, rice and beans, etc. Some product is also displayed in plain plastic bags. Some retailers also sell frozen product from retail freezer cabinets. This is packed in plain plastic bags and may be priced.

The retailer will weigh the product and sells to the consumer by the pound. Retail sales peak on Fridays and Saturdays.

The main consumers in the UK of smoked fish from West Africa are people from West African origin. The main market is in London. Small pockets of consumers exist in other major UK cities such as Leeds and Glasgow, where product is supplied by traders who visit London to buy and return to their respective cities. According to a Nigerian trader in Brixton “all Nigerians must include smoked fish in their daily soup [meal]”. She went on to explain that smoked fish is sold quickly for a good profit.

As well as the formal outlets, there is also some trade from peoples’ homes.

Consumers tend to buy according to price rather than quality. The cheaper the better. Some consumers do not like fish head on and prefer chunks. Ghanaians and Nigerians are the main consumers of 'herrings' (flat sardinella, *Sardinella maderensis*).

10. INDICATOR OF MARKET SIZE IN UK

The estimated quantities of imports of smoked fish into the UK, based on interviews for this study, is used as a guide for estimating the size of the current market.

Qualitative data from interviews suggests that from Nigeria alone approximately 5 tonnes of smoked fish per month (60 tonnes per annum) is currently entering the country as airfreight. Most of this is via Gatwick. Imports from Cameroon, Côte d'Ivoire and Ghana could amount to another 5 tonnes per month or 60 tonnes per annum.

Assuming that 200 kg of smoked fish arrives as accompanied baggage on each flight from Nigeria and Ghana (35 direct flights per week), the weekly total arriving this way from those two countries could be in the order of 7 tonnes or approximately 360 tonnes per annum. This is a tentative figure based on qualitative data and there is scope for further investigation to establish a more reliable understanding of the trade.

In addition there is likely to be accompanied baggage fish from other West African countries on direct and in-direct flights. And there are also imports from France, with at least one importer bringing fish into London from Paris by road.

Based on these figures the total quantity of smoked fish imported into the UK is in the region of 500 tonnes per annum. This seems a realistic figure based on the understanding gained from research for this study. Although the figures require validating, especially those for accompanied baggage. At an average retail price of £15/kg the retail value of such a quantity of fish in London would be £7.5 million/annum.

Table 3. Estimated annual imports of smoked fish from West Africa into the UK

Type of imports	Weight (t)
Formally recorded under EC Commodity Code 030549 80 "Other smoked fish including fillets"	40
Formal imports otherwise recorded (estimate)	80
Accompanied baggage (estimate)	360
Other	20
Total	500

11. MARKET PROSPECTS

Over the last six years the wholesale price is said to have remained fairly constant and, if anything, has lowered. In that period the number of importers has increased from around five to between twenty and thirty and the volume of fish entering the country, in particular as accompanied baggage, is thought to have increased dramatically.

The presence of a large Afro-Caribbean population in London should ensure a ready market for product for the foreseeable future.

12. SANITARY CONTROL

There are Port Health Authorities run by local authorities at ports of entry into the EU such as Heathrow and Gatwick Airports. At the last two airports the offices are manned by Environmental Health Officers (EHO) who are responsible for conducting document, identity and physical checks on imported consignments of food from all countries, including smoked fish from West Africa.

The inspections are based on the following legislation:

- EU legislation pertaining specifically to Nigeria is 98/420/EC: Commission Decision of 30 June 1998 laying down special conditions governing imports of fishery and aquaculture products originating in Nigeria. (See Annex 2 of this report).
- UK Products of Origin (import & export) Regulations 1996 (these regulations are being replaced)
- EU Directive 93/13 (inspectors guidelines)
- EU Directive 97/98 (veterinary checks)
- EU Directive 91/493 (health certificate, origin, packaging and labelling)
- EU Directive 97/296 (list of allowed export countries)

The document and identity checks are compulsory. The physical check is carried out on a sample of a consignment. According to Port Health at Gatwick, all consignments of smoked fish undergo a physical check at the border inspection post (BIP), situated in the airport customs shed. There is a charge to importers for the BIP check.

A consignment will pass the document check if there is a properly filled out and signed health certificate issued by the EU recognised competent authority in the country of origin. The certificate should match the consignment characteristics, be written in English and show the number of the EU authorised exporter. Port Health will also require the Airway Bill and ideally a packing list for cross checking the health certificate details.

Inspectors will check that the export establishment number and country of origin are clearly stamped or written on each box for the identity check.

The physical check involves an inspection of the product for any abnormalities (insect infestation) and the packaging to make sure that it is not reused (cardboard boxes) or split and that it is protecting the product as per EU Directive 493. If the consignment does not pass the checks then it will be detained. This fish is either:

- released after the problem has been rectified (for example original Health Certificate in French so English version had to be arranged).
- shipped back at importer's expense to country of origin using main cargo carriers which charge £4 per kg.
- destroyed – land fill or incineration

13. MARKET ACCESS

At the time of the study there was conflicting information regarding the ease by which product was being formally imported. Some importers did express problems. Others admitted that they had resorted to supplies from the accompanied baggage route. There were no

country bans for product from Nigeria and Ghana in the UK, yet from Ghana there was only one EU authorised exporter sending consignments to the UK and two from Nigeria. Nevertheless, there are problems related to sanitary controls, which restrict access of some product. These are described in the Constraints to Trade section below.

In order to improve market access for product from Ghana it is understood that an EU grant of £100 000 was provided for the construction of an authorized exporting establishment. Several UK traders mentioned that the plant had not been built and were disappointed nothing had so far come of the initiative.

There is no customs duty or VAT to pay on smoked fish. Costs the importer incurs include the following:

Border inspection	Gatwick £35, Heathrow £70, Brussels £40 (depending on weight)
Handling charges at airport	11p/kg
Transport to customs shed	12p/kg
Agents clearing charge	£40 per consignment

14. CONSTRAINTS TO TRADE

As a result of enforcement of relatively recent EU legislation governing fish and fish products and import/export, consignments of smoked fish are regularly detained and often destroyed by Port Health Authorities at Gatwick and Heathrow Airports.

Approximately 1 in 4 consignments of air freighted smoked fish are detained by Port Health for some reason at port of entry and 70% of these are destroyed. This is approximately 17.5% of airfreight consignments and equivalent to 20 tonnes of product per annum, with a retail value of £240 000 to £390 000 at current prices. The main reasons why smoked fish consignments are detained are:

- Smoked fish is smuggled in among other goods such as vegetables and is therefore undeclared and so has no health certificate. Likewise undeclared dried meat is concealed in consignments of smoked fish.
- Packaging is inadequate – re-used computer or TV boxes, in poor condition, newspaper or baskets are used for packing the fish.
- Insect infestation.



Figure 7: Smoked *Clarias* from Nigeria infested with *Dermestes* sp.



Figure 8: Consignment detained at Gatwick

- Establishment number stapled on the box rather than written on.
- Health certificates not filled in correctly. For example the establishment number is used as the reference number. The word “various” is used as the scientific name of species rather than the scientific name. The wrong department is shown, the wrong weight or changes have been made. At Gatwick the main reason for detaining smoked fish was due to problems with the health certificate and this mainly applied to Nigerian consignments. The problem has been serious enough to prompt the Port Health to communicate their observations to the UK Food Standards Agency, the appropriate organisation to discuss the problem with the EU or Nigeria directly.



Figure 9: Smoked sole detained at Gatwick airport due to mould growth

During a short visit to Gatwick airport in late June the author saw two consignments from Nigeria that had been detained. One of smoked *Clarias* sp. was detained due to insect infestation and the other, of smoked sole, because of mould growth (see Figures 7, 8, and 9). The previous day a 1 200 kg consignment of smoked shrimp from Tanzania had been detained because of insect infestation. All these consignments were to be destroyed.

Recent consignments detained by Port Health at Heathrow included the following:

Nigeria	product undeclared and no health certificate (two consignments)
Senegal	insect infestation
Guinea	no establishment number, country of origin or health certificate
Cameroon	insect infestation, health certificate made out for 100 kg where as actual consignment was 200 kg.
Ghana	undeclared and no health certificate (four consignments)

Mrs S., who imported 600 kg of product from Nigeria for her shop in Brixton, had her fish detained by the port health authority at Heathrow because tipex had been used on the health certificate.

Mrs T., another Brixton based trader, borrowed £10 000 and imported foodstuffs including smoked fish from Nigeria into the UK earlier in the year. The goods were detained and Mrs T. lost all her goods and was made bankrupt.

Due to time limitations, it was not possible to study the accompanied baggage trade in detail. What can be said at this stage however, is that this trade appears to be relatively large, probably encouraged by difficulties in export from authorised plants and the risk of detention of product in the UK.

15. SUGGESTED IMPROVEMENTS

1. In order to minimize the risk of consignments being detained by Port Health on arrival in an EU country it is recommended that existing and potential exporters and importers attention is drawn to the control of insect infestation and mould growth, the

use of correct packaging and how to prepare and process the necessary paperwork for export/import. Appropriate best practice guidelines are given in Annex 2. Some of these guidelines are based on earlier work by Crawley Borough Council (Port Health, Gatwick Airport) and Air Marine Ltd, cargo clearing agents at Heathrow. It is recommended that the project disseminates a version of these guidelines in relevant languages to exporters, importers, trade development organizations, clearing agents and competent authorities in Nigeria, West Africa and Europe. Copies of relevant documents could also be circulated – health certificate, CVC, Airway bill.

2. The establishment of dedicated fish smoking plants/operations in West Africa which are approved for export by the EU was something which nearly all traders and the key clearing agent interviewed, agreed would improve trade. Of those interviewed, most were interested in investing in such a venture. One lady had land in Lagos that could be used. Another had capital, but was worried about the security situation. Another had problems accessing capital and was unable to attract the interests of UK banks, and did not want to deal with banks in West Africa because of the extra expense involved.

In order to assist the development of such processing facilities by interested parties the project may wish to consider undertaking an analysis of why such facilities have not already been established and the perceptions of exporters, potential investors and funding organisations to such a venture. This should aim to identify constraints and opportunities regarding the establishment of such plants in the region and draw firmer conclusions than this study alone is able to make.

3. The idea of producing in the UK a traditional type smoked product as an import substitute was discussed with some traders in London. It did not meet with much support as it was said that consumers would prefer the original product and it may not be easy to replicate processing in the UK. The rationale behind such an initiative is the high value of the product, the risk of detention and reducing the export of fish protein from Africa thus making more available for consumption within the region. There is scope to explore the concept further. It would not be technically difficult to undertake small-scale experimental production using farmed catfish and tilapia (readily available), suitable hardwood fuel and a brick built Chorkor type oven. The final products would be market tested in London either via retailers or direct to consumers and depending on the results, a feasibility study could then be undertaken. The latter should include an assessment of whether processing premises meeting the required health and hygiene regulations would make such a venture economically feasible.
4. An indicative assessment was made of the volume of smoked fish entering the UK as accompanied baggage. The indications are that the quantity of product via this route is large and perhaps larger than formally air freighted product. There is scope to undertake further research on this aspect of the trade to accurately determine its volume and to generate more of an understanding of the rationale and characteristics of this trade.

ACKNOWLEDGEMENTS

The author would like to thank the London based smoked fish importers and traders who were involved in the study. Many thanks also go to Michelle Blackstone, Senior Environmental Health Officer, Gatwick Airport and David Balchin of Air Marine Ltd.

ANNEX 1**EU LEGISLATION PERTAINING TO NIGERIAN FISH EXPORTS**

98/420/EC: Commission Decision of 30 June 1998 laying down special conditions governing imports of fishery and aquaculture products originating in Nigeria (notified under document number C(1998) 1851) (Text with EEA relevance) Official Journal L 190 , 04/07/1998 p. 0059 - 0065

COMMISSION DECISION of 30 June 1998 laying down special conditions governing imports of fishery and aquaculture products originating in Nigeria (notified under document number C(1998) 1851) (Text with EEA relevance) (98/420/EC)

THE COMMISSION OF THE EUROPEAN COMMUNITIES,
Having regard to the Treaty establishing the European Community,

Having regard to Council Directive 91/493/EEC of 22 July 1991 laying down the health conditions for the production and the placing on the market of fishery products (1), as last amended by the Act of Accession of Austria, Finland and Sweden, and in particular Article 11 thereof,

Whereas a Commission expert has conducted an inspection visit to Nigeria to verify the conditions under which fishery products are produced, stored and dispatched to the Community;

Whereas the provisions of legislation of Nigeria on health inspection and monitoring of fishery products may be considered equivalent to those laid down in Directive 91/493/EEC;

Whereas, in Nigeria the Nigeria Federal Department of Fisheries (FDF) of the Federal Ministry of Agriculture and Natural Resources is capable of effectively verifying the application of the laws in force;

Whereas the procedure for obtaining the health certificate referred to in Article 11(4)(a) of Directive 91/493/EEC must also cover the definition of a model certificate, the minimum requirements regarding the language(s) in which it must be drafted and the grade of the person empowered to sign it;

Whereas, pursuant to Article 11(4)(b) of Directive 91/493/EEC, a mark should be affixed to packages of fishery products giving the name of the third country and the approval/registration number of the establishment, factory vessel, cold store or freezer vessel of origin;

Whereas, pursuant to Article 11(4)(c) of Directive 91/493/EEC, a list of approved establishments, factory vessels or cold stores must be drawn up; whereas a list of freezer vessels registered in the sense of Council Directive 92/48/EEC (2) must be drawn up;

Whereas this list must be drawn up on the basis of a communication from the FDF to the Commission;

Whereas it is therefore for the FDF to ensure compliance with the provisions laid down to that end in Article 11(4) of Directive 91/493/EEC;

Whereas the FDF has provided official assurances regarding compliance with the rules set out in Chapter V of the Annex to Directive 91/493/EEC and regarding the fulfilment of requirements

equivalent to those laid down by that Directive for the approval or registration of establishments, factory vessels, cold stores or freezer vessels;

Whereas the measures provided for in this Decision are in accordance with the opinion of the Standing Veterinary Committee,

HAS ADOPTED THIS DECISION:

Article 1. The Federal Department of Fisheries (FDF) of the Federal Ministry of Agriculture and Natural Resources shall be the competent authority in Nigeria for verifying and certifying compliance of fishery and aquaculture products with the requirements of Directive 91/493/EEC.

Article 2. Fishery and aquaculture products originating in Nigeria must meet the following conditions:

- each consignment must be accompanied by a numbered original health certificate, duly completed, signed, dated and comprising a single sheet in accordance with the model in Annex A hereto;
- the products must come from approved establishments, factory vessels, cold stores or registered freezer vessels listed in Annex B hereto;
- except in the case of frozen fishery products in bulk and intended for the manufacture of preserved foods, all packages must bear the word "NIGERIA" and the approval/registration number of the establishment, factory vessel, cold store or freezer vessel of origin in indelible letters.

Article 3. Certificates as referred to in Article 2(1) must be drawn up in at least one official language of the Member State where the checks are carried out. Certificates must bear the name, capacity and signature of the representative of the FDF and the latter's official stamp in a colour different from that of other endorsements.

Article 4. This Decision is addressed to the Member States.

Done at Brussels, 30 June 1998.

For the Commission
Franz FISCHLER
Member of the Commission

(1) OJ L 268, 24. 9. 1991, p. 15.

(2) OJ L 187, 7. 7. 1992, p. 41.

ANNEX A

HEALTH CERTIFICATE for fishery and aquaculture products originating in Nigeria and intended for export to the European Community, excluding bivalve molluscs, echinoderms, tunicates and marine gastropods in whatever form

Reference No:

Country/Territory of dispatch: NIGERIA

Competent authority: Federal Department of Fisheries (FDF) of the Federal Ministry of Agriculture and Natural Resources

I. Details identifying the fishery products

- Description of Fishery - Aquaculture products (1):
- Species (scientific name):
- Presentation of product and type of treatment (2):
- Code number (where available):
- Type of packaging:
- Number of packages:
- Net weight:
- Requisite storage and transport temperature:

II. Origin of products

Name(s) and official approval number(s) of establishment(s), factory vessel(s) or cold store(s) approved or freezer vessel(s) registered by the FDF for export to the EC:

III. Destination of products

The products are dispatched from: (place of dispatch) to: (country and place of destination) by the following means of transport: Name and address of dispatcher: Name of consignee and address at place of destination: (1) Delete where applicable. (2) Live, refrigerated, frozen, salted, smoked, preserved, etc.

IV. Health attestation

The official inspector hereby certifies that the fishery or aquaculture products specified above:

1. were caught and handled on board vessels in accordance with the health rules laid down by Directive 92/48/EEC;
2. were landed, handled and where appropriate packaged, prepared, processed, frozen, thawed and stored hygienically in compliance with the requirements laid down in Chapters II, III and IV of the Annex to Directive 91/493/EEC;
3. have undergone health controls in accordance with Chapter V of the Annex to Directive 91/493/EEC;
4. are packaged, marked, stored and transported in accordance with Chapters VI, VII and VIII of the Annex to Directive 91/493/EEC;
5. do not come from toxic species or species containing biotoxins;
6. have satisfactorily undergone the organoleptic, parasitological, chemical and microbiological checks laid down for certain categories of fishery products by Directive 91/493/EEC and in the implementing decisions thereto.

The undersigned official inspector hereby declares that he is aware of the provisions of Directive 91/493/EEC, Directive 92/48/EEC and Decision 98/420/EC. Done at, (Place) on (Date) Official stamp⁽¹⁾

Signature of official inspector⁽¹⁾

(Name in capital letters, capacity and qualifications of person signing)

⁽¹⁾ The colour of the stamp and signature must be different from that of the other particulars in the certificate.

ANNEX 2**BEST PRACTICE GUIDELINES****Best Practice Guidelines for exporters and importers to minimize detention of smoked fish at port of entry**

Imports of fishery products into countries of the European Union such as United Kingdom, France, Italy and Belgium need to undergo veterinary checks conducted by the Port Health Authority, located at the airport of entry. A payment must be made to the authority for the checks before a consignment can be released.

The authority is responsible for checking documents, packaging and the quality of smoked fish. A consignment must also then be cleared by Customs before it can be released to the importer.

Please let the EU port health authority at the airport know at least 6 hours in advance that you have a consignment arriving on a flight.

Documents

Exporters and Importers should be aware the following documents are required otherwise a consignment will be detained and either shipped back to the exporter or destroyed:

- a) Consignments must have a fully completed and original health certificate issued by the EU competent authority in the country of export. The health certificate must be completed using the language of the country of entry into the EU e.g. English for the UK, French for France.

The health certificate must:

- be on a single sheet of paper
- show no corrections or tipex
- give the common name and scientific name of the fish species
- give the correct weight of the consignment as per the Airway bill
- show the official stamp of the EU authorized authority in the country of export
- include the name, capacity and signature of the authorised EU authority representative
- have an official stamp of the authorized authority in a different colour to other stamps on the certificate.

- b) Airway bill or Bill of Lading

This must show the consignee's full name and address and telephone number.

- c) Packing list and or Invoices

This must always be attached to the Airway bill. All items in the consignment must be declared. The word assorted is not allowed.

- d) Certificate of Veterinary Checks available from the EU port health authority.

Importers wishing to clear their own consignments should go to the airport cargo shed reception. The reception staff will give you a copy of the Certificate of Veterinary Checks (CVC) form and

the other documents (health certificate, invoice, Airway bill, packing list) accompanying the consignment. You must complete the left-hand side of the CVC form. The other documents will contain information you require to do this.

When you have completed the CVC you should take it along with the Health Certificate, Airway bill and/or invoices and packing list to the Port Health Authority. An officer will inspect the consignment and issue a Port Health clearance note. You can now obtain customs clearance.

Packaging

Smoked fish must be packed in new cardboard or polystyrene boxes. It must not be packed in re-used boxes, baskets or be packed using newspaper otherwise it will be detained.

Clearly written or stamped on each box should be:

- name of the country of origin of the product
- number of the EU approved establishment from which product originated

Product

The two main reasons why Port Health will detain and destroy smoked fish consignments are because it is infested with insects or there is mould growth on the product.

Insect Infestation

The most common insect infesting smoked fish is the adult *Dermestes* beetle and its larvae (small hairy reddish brown maggot). The larvae do the most physical damage to the fish by eating away the flesh. The female beetle lays her eggs on or in the flesh. The eggs hatch into larvae one to three days later. The larvae remain feeding on the fish for up to three weeks until they are about 15 mm long. At this size they pupate before turning into adult beetles. Exporters should ensure that after smoking the product does not come into contact with adult beetles or larvae. Smoked fish should be stored in an insect free environment. It should not be stored or mixed with product from unknown sources where insect infestation may not have been controlled. The exporter should check a consignment for beetle infestation before it is packed and taken to the airport. Only insect free consignments should be exported.

Mould Growth

Mould spores are found in the air and soil and can contaminate fish during processing. Moulds grow on smoked fish whenever there is enough moisture. Moulds like humid, damp conditions and temperatures of 30 °C to 35 °C. When moulds occur they are relatively easy to remove if caught early enough, as they attack the surface of the fish first and do not immediately penetrate the flesh. At this stage they can be removed by brushing and scraping. Exporters should ensure that smoked fish are checked for mould growth before a consignment is packed and transported. They should also make sure that smoked fish has been well dried and stored and packed in a dry environment using dry packaging materials. Packing smoked fish close to high moisture food stuffs such as vegetables may lead to high humid conditions during transport and will increase the likelihood of mould growth.

ANNEX 3**USEFUL CONTACTS**

Port Health, Gatwick Airport
Tel: (01293) 507447
Fax: (01293) 568281

Port Health, Heathrow Airport
Tel: (020) 88976900

David Balchin
Air Marine Ltd
International Shipping and Forwarding Agents
Section A, Building 248, Elgin Crescent
Eastern Business Park
Heathrow Airport
Tel: (020) 87548535
Fax: (020) 87594443

Fovitor International Ltd
(Smoked Fish Importer)
Tel: (0181) 5220154
Fax: (0181) 2212154

Abidjan Market
(Smoked Fish Importers)
160 Wyndham Road
London
Tel: (0171) 7406301

CA Food
(Smoked Fish Importers)
Tel: 020 7327026

Ghana House
(Smoked fish retailers)
Brixton Market
Tel: 020 87548535

Mrs Olu Shoneye
Viva Afro Caribbean Food Store
Brixton Market
Tel: (0171) 2740504

BIMS African Food Store Ltd
102 Rye Lane Peckham
London
Tel: (020) 77321564

