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**UGANDA COUNTRY REPORT ON THE INTEGRATION OF MULTIPLE SOURCES OF  
TECHNICAL ASSISTANCE TO CAPACITY BUILDING ON IMPROVING THE  
QUALITY OF FISH FOR EXPORT**

*Dr. Sam. Zaramba  
Director, Clinical & Community Services  
Ministry of Health  
P.O. Box. 7272, Kampala, Uganda  
Tel.+ 256 41 340882 Email: [zaramba@moh.go.ug](mailto:zaramba@moh.go.ug)*

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## 1.0. Introduction

### 1.1. Overview of the Food Safety Control Systems in Uganda

- Food borne illness is recognized to be a significant public health problem in Uganda, though data are lacking that would permit accurate quantification of morbidity and mortality associated with food borne hazards.
- Much of the burden of illness results from basic sanitation failures that occur in food production, processing, retailing, and handling in the home.
- Achieving basic food hygiene is made difficult by the lack of necessary sanitation infrastructure in many areas of the country and segments of the food system.
- For processed foods, Uganda depends heavily on imports and must guard against products that are sub-standard in quality or beyond their expiration date.
- The current food control system is severely hampered by an obsolete food law and the lack of resources required building a sound food control infrastructure, including an adequate force, laboratory facilities, and necessary scientific expertise and research. The current Food Act does not address the new technological developments in the Food Industry e.g. safety of Genetically Modified Foods, International Food regulations as required by the World Trade Organization (WTO), the EC and other international food markets for example for residues, Packaging and other phytosanitary requirements

### 1.2. State of the Fisheries Resource in Uganda

Owing to its freshwater lakes and rivers, Uganda has substantial fisheries resources. These lakes and rivers are located in at least 27 of the country 's 56 districts. Lake Victoria, the second largest lake in the world, has over 4000 landing sites on the Ugandan side (Ministry of Agriculture, Animal Industry & Fisheries, 1988). The fisheries resources of Uganda are important to the economy and the people. They contribute to the gross domestic product (GDP), income generation, export earnings and nutrition.

Total investment by private investors in the fish sector in Uganda is around 50 million dollars.

Table 1. Revenue from fish in Uganda (US Dollars)

Year	Amount per Annum
1992	12 million dollars
1996	60 million dollars
January, February, March 1999	17 million dollars
April, May June, July 1999	2.5 million dollars

Source: MAAIF, Statistics Department, 1996.

Household expenditure on fish, export sales and institutional purchases provides a steady source of income for those engaged in the harvesting, processing, marketing and distribution of fish and fish products. Not only is this income significant, but also it is available all year round.

The fish in Uganda's lakes, rivers and wetlands are a major source of human food. Fish and fish products contribute over 60% of the country's total protein supply, valued at over US\$ 90 million in 1989. This excludes the catch that does not pass through the formal monetary sector, which is also considerable. While a high quality protein, fish in Uganda is generally cheaper than other solid proteins and thus is accessible to a large segment of the population (State of the Environment Report for Uganda, 1996).

## **2.0. The ban of Uganda fish on international markets**

In 1997 a ban was imposed on fish exports to the European Union (EU) markets because the country's fish processors and exporters failed to meet the new EU Hygiene and Processing quality standards for fish exports. There was also a scare that Uganda had the intention to spray chemicals on the lakes to fight the Water Hyacinth weed, which had invaded the water bodies at alarming rates with serious impacts on the fisheries industry. This fear was further compounded by the use of poisons by some unscrupulous fishermen to catch fish. Endosulfan, a broad-spectrum insecticide commonly used to control pests in crops was detected in poisoned fish.

## **3.0. Risk assessment**

### **3.1. European Union inspection mission to Uganda**

The EU carried out the following:

- In March 1997 and December 1997 for overall hygiene standards.
- In November 1998 for harmonization of Uganda in which Uganda was put on List II and Tanzania on List I.
- In August 1999 for guarantees regarding absence of pesticide residue in fish.
- In November 2000 for harmonization of Uganda fish standards and guarantees regarding pesticide residues.

There was a problem with the structure of the Competent Authority identified by European Union, Dutch Authorities and Council of Minister in the meeting in Dar-es-Salaam in June 1999. Furthermore there was lack of a clear line of command since the concerned bodies namely: Uganda National Bureau of Standards (UNBS) under the Ministry of Tourism, Trade and Industry, the Department of Fisheries under the Ministry of Agriculture, Animal industry and Fisheries, (MAAIF), Ministry of Health which is responsible for food safety and hygiene were not coordinated. The National Codex Committee was not yet officially launched.

### **3.2. Inspection**

The inspectors of Department of Fisheries could not perform their duties. They did not have clear guidelines and standard operating practices in particular with regard to inspecting batches of fish being

landed, hygiene conditions at landing sites, sampling procedure, records of their own activities and documents required for traceability of origin and transportation of fish.

### **3.3. Laboratory**

A suitable laboratory for pesticide analysis was not available. Government Chemist had been put in charge of performing pesticide residue analysis in fish products; however, the performance and capacity were considered totally inadequate by the EU inspection team.

### **3.4. Legislation**

The Fish and Crocodile Act had not been upgraded to meet the present requirements of the fish industry.

### **3.5. Decentralization**

District Fisheries Officers (DFOs) were not answerable to Department of Fisheries Resources under Ministry of Agriculture, Animal Industry and Fisheries. Hence not following the instructions regarding hygiene and handling of fish as required by EU regulations.

### **3.6. Landing Sites**

Most public landing sites had not been upgraded and their facilities did not meet minimum EU requirements.

### **3.7. Fish Handling**

Fish was generally not hygienically handled throughout the chain.

## **4.0 Impact of the ban on fish exports**

Loss to Uganda in terms of reduced returns for the continued ban till July 1999 was 36.9 million dollars. Loss to fishermen community on account of reduced prices and less activity of fishing was US Dollars 720,000 per month.

Out of 11 fish factories in Uganda, 3 were closed and the remaining factories were working at 20% capacity and therefore most of the factories had laid off 60% to 70% of their labour force. Around 2,000 directly employed people were already laid off.

There are around 100,000 people involved in various fishing activities including fishermen, fishmongers, transporters of fish, etc. Around 32,000 of them were jobless the remainder were earning less than one-third of their normal earnings. Families and other dependants of these directly employed people were also affected.

Other related industries like packaging industry, fishnet industry, transport industry and economy in general were directly affected and all the people involved also suffered direct consequences because of the EU ban on fish.

## **5.0. Mitigation measures**

### **5.1. General**

- The Health Act and the Minimum Health Care Package - In order to improve the National Health Service delivery, the Government of Uganda through the Ministry of Health has placed Environmental Health in the list of the “**Minimum Health Care Package**” in the National Health Policy 2001/2002. This therefore calls for priority actions in the areas of Food Hygiene and Food Safety.
- The Ministries of Health, Agriculture, Animal Industry and Fisheries have jointly developed a comprehensive National Food and Nutrition Policy.
- Food Standards – The Uganda National Bureau of Standards (UNBS) has developed, updated Food Safety Standards and harmonized them with the Codex Standards.

### **5.2. Specific measures under UNIDO support**

#### **5.2.1. The Uganda Integrated Programme on the Food Industry.**

The Uganda Integrated Programme (UIP) is a joint venture between the Government of Uganda through the Ministry of Trade, Tourism and Industry and UNIDO. Through this venture the main activities were focused on the fish-processing sub-sector, which enabled Uganda to comply with the European Union (EU) requirements for fishery products exports. UIP provided technical assistance in preparing responses to the EU Commission regarding guarantees put in place by Uganda to meet the EU requirements.

#### **5.2.2. Fish Inspection Services and public awareness programmes**

- The fish inspection services have been streamlined and the capacity of the Competent Authority (Department of Fisheries Resources) strengthened. Achievements in this sub-sector will be used as a model for other sub-sectors responsible for the public health and safety of the consumers and/or having export potential. The inspection system will be used in development of the Food Control System.
- Laboratories were provided with equipment and technical support. UNBS Microbiology Laboratory having been fully equipped and also introduced a Quality Management System has been internationally accredited by SANAS. Government Chemist Analytical Laboratory is still undergoing upgrading.
- UNIDO has proposed hygienic fish handling practices on the lake and at landing sites in conformity with EU quality/safety requirements. Two pilot boats were constructed and handed over to Uganda Fish Processors and Exporters Association to conduct trials for assessment of

the socio-economic and technical effectiveness. Based on the results, the most suitable designs will be disseminated to the 20 local boat builders already trained in boat building and design by UNIDO, the whole fishing fleet and regulatory authorities to facilitate adoption.

- Ministry of Health with assistance from WHO (Uganda) put in place effective and aggressive public awareness (IEC) programmes targeted at the fish processors, the fishermen and the consumers on issues of fish and food safety in general.

### 5.2.3. Private sector participation

- **Chemiphar (u) Ltd. is a private laboratory that benefited from UNIDO support. The lab. was approved by the EU inspectors to carry out pesticide residue analysis in Uganda.**
- The Uganda Fish processors have established Fish Processing Pilot Enterprises in order to address anomalies in the fish industry. The enterprises have been able to implement ISO 9000 Quality Management Systems and the principles of Hazard Analysis Critical Control Point (HACCP). Four enterprises have been certified to ISO 9000. Implementation of HACCP made it possible to export fish to the US market. In addition, the enterprises have improved in quality management through introduction of the uniform “Code of Practice”. Experiences in these pilot enterprises will also act as a model for other sub-sectors.
- Political structures were used at community level for policing and monitoring fishing activities. This was done using all available media person to person, print and electronic media, public rallies at landing sites and markets.

## 6.0. Outcomes

- The ban was officially lifted on 4<sup>th</sup> August 2000 and fish exports to the EU resumed on bilateral basis. The EU inspection mission that took place from 2<sup>nd</sup> to 6<sup>th</sup> October 2000 recommended upgrading Uganda to List 1 (list of countries allowed to freely export fish and fish products to the EU). Uganda was officially upgraded to list I in October 2001.
- As a result of strengthening the fish inspection services, Ugandan fish got access to the US market, which demanded for approved HACCP systems from the fish factories.
- Availability of internationally recognised laboratory services locally in Uganda will greatly facilitate exports of products and also reduce on the costs of laboratory analysis abroad
- With the recent resumption of fish exports to the EU and the increased revenue from fish exports, Uganda’s shilling has been strengthened. Factories have resumed operations at full capacity. The staff who were laid off during the ban have been re-instated. The fishing communities are back to earn a living.

Table 2 Revenue for Uganda in US Dollars after the ban was lifted

Month	Revenue in US\$
September 2000	1,941,456
October 2000	1,444,173
November 2000	2,077,377
December 2000	2,531,842

## 7.0. Lessons learnt

- It is important to involve communities in such interventions. Community involvement in the fight against fish poisoning proved successful. The public responded with community policing in the fish industry.
- Institutional linkages and harmonization of activities in the fisheries sector are very important if fish safety standards have to be applied and maintained.
- This experience re-emphasized the importance of harmonization of policies, standards and surveillance systems for food safety controls at the national, regional and international levels.
- In response to the demands of the European Union, Uganda has created a world-class food control system for fish exports, demonstrating what can be accomplished through focused interventions and availability of resources.
- A wide array of stakeholders supported improvement in the Uganda food control system to protect Uganda's consumers and strengthen Uganda's ability to participate as an exporter in the global food system. This re-emphasises the importance of involving the private and all stakeholders for any intervention to succeed
- Political will and support at all levels from the highest to the local authority is crucial

## 8.0. Challenges

- Sustaining the above efforts, achievements and cooperation from the fishing community
- To ensure continued surveillance and monitoring, enforcement of the law and maintain standards.
- To ensure uninterrupted logistical support. There is need to develop and sustain laboratory services, trained personnel, and provide supplies. to promote the programme.

## 9.0. Proposed way forward

The Government of Uganda is in the process of developing an effective **National Food Safety Control System**. This will involve:

- Reviewing and updating the existing Food law in order to have a **modern and unified Food Safety Law**.
- To develop an effective **National Food Control Strategic Plan**, which clearly spells out the roles and responsibilities of the key stakeholders. The strategic plan should among others address issues of Institutional linkages, collaboration and harmonization of activities aimed at promoting and improving the status of Food Hygiene and Food safety in Uganda. It will be a guiding tool for implementation of the Food safety Law.
- To harmonize the National Food Standards with the Codex Standards.
- Make budgetary provisions and source for funds to support implementation of the Strategic Plan.