



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS**

Thirty-First Session

Tromsø, Norway

11 – 16 April 2011

MODEL CERTIFICATES

COMMENTS

(Argentina, Canada, Kenya, Peru and South Africa)

ARGENTINA

Argentina is grateful for the opportunity to comment on this document.

Firstly, we would like to draw attention to fishery products derived from aquaculture, the observation of which should be analysed in the certificate under discussion.

Similarly, the present document does not take into account the date of the “SEAL”, which is considered of considerable importance in guaranteeing the safety of the load and product traceability.

SPECIFIC COMMENTS

Regarding the **TITLE**, Argentina considers it appropriate to leave a generic title and then, depending on the specific case of the destination country, adding words like “sanitary”, “zoosanitary”, etc., as the case may be.

With regard to the **CONSIGNOR/EXPORTER**, Argentina considers it would be more appropriate to change this to name and address of the consignor/exporter.

With regard to the **CERTIFICATE NUMBER**, Argentina considers that this term is clearer and that the reference to “identification” should not be used as it could lead to “i-identification”. Similarly, as stated in the GENERAL COMMENTS, it would be a good idea to include alongside this number the **SEAL NUMBER**.

With regard to the **CONSIGNOR/IMPORTER**, Argentina considers it would be more appropriate to change this to name and address of the consignor/importer.

With regard to the **COUNTRY OF ORIGIN**, Argentina considers it very important to include this item adding as well the **COUNTRY OF CONSIGNMENT**, a term that provides commercial transparency in third-party commercial relations in cases where knowing this information is of vital importance with regard to zoosanitary issues.

With regard to the **MEANS OF TRANSPORT**, Argentina considers it important to include in parentheses the following text: (description and identification – name and/or number).

With regard to the **CONDITIONS FOR TRANSPORT/STORAGE**, Argentina considers this description appropriate, and not a term that only refers to temperature. In this way, the “conditions” would be more inclusive for considering the various aspects associated with transport and storage.

With regard to the **NATURE OF THE FOOD, COMMODITY CODE (HS CODE) WHERE APPROPRIATE**, Argentina considers that it would be more appropriate to change this to “**NATURE or DESCRIPTION OF THE PRODUCT**”, without including the customs position, as this information is

provided for commercial/tax purposes that are irrelevant to health services that have other responsibilities.

With regard to the **SPECIES**, Argentina considers that it would be appropriate to include in parentheses the following text: **(scientific name where appropriate)**, to be consistent with the importance CCFPP places on the scientific names for identifying species.

With regard to the **INTENDED PURPOSE**, Argentina considers that this term could give rise to confusion; accordingly, it suggests changing it to **“INTENDED USE OF THE GOODS”**, which could include not only human consumption, but also the production of feed, pharmacopoeia, etc.

With regard to the **PRODUCER/MANUFACTURER**, Argentina considers that the following text would be more appropriate: **“Name, Address and Registration Number/Authorisation by the competent authority”**.

Similarly, Argentina considers that it would be appropriate to consider that this field incorporate a reference to other establishments involved in the fishery products, which may include fishing operations and storage facilities.

In this respect, for each of these, the following could be included: **“Name of the establishment, Registration number/Authorisation by the competent authority and Address”**.

Finally, and consistent with the above comments, Argentina considers that the item **“Approval number of establishments”** should be deleted, as it would be redundant, as well as potentially causing confusion within the context of the above comments.

With regard to the **ATTESTATIONS**, Argentina is of the opinion that NO text should be included in this item, as it could exclude the conditions applicable in a particular country.

Similarly, Argentina considers that the text of “IV. ATTESTATION [...]” presented could be limiting for trade, especially with regard to the scope of the concept of “equivalent sanitary measures”, and that it is more appropriate that ATTESTATION issues be defined in particular between the contracting parties.

CANADA

General

Canada supports the objectives pursued by this new work. Harmonization of certificates at an international level will support efforts to streamline certification procedures and could contribute to reducing the number of the different export certificates issued.

Specific Comments

1. Section 16: Attestations

A key element to maintain from the Model Certificate for Fish and Fishery Products (CAC/GL 48-2004) is the wording of the two statements in the attestation section.

Proposed Change:

When used for the sanitary certification of fish and fishery products, the Generic Model Certificate should specify the need for the attestations below:

- i) The products described above originate from (an) approved establishment(s) that has been approved by, or otherwise determined to be in good regulatory standing with the competent authority in the exporting country and
- ii) have been handled, prepared or processed, identified, stored and transported under a competent HACCP and sanitary programme consistently implemented and in accordance with the requirements laid down in (Codex Code of Practice for Fish and Fishery Products CAC/RCP 52-20030)

Rationale for Proposed Change:

The absence of Codex accepted attestations could lead to complex discussions between the importing and exporting country in order to negotiate mutually acceptable wording for this section. Additionally, it is important to note that CCFPP at its 26th session, amended section 5.2.9 Attestations in the Model Certificate for Fish and Fishery Products such that the attestations do not refer to the product itself but rather to the fact that the product originates from an establishment that has been approved by or is otherwise in good standing with the competent authority, and that has a HACCP and sanitary program in accordance with Codex requirements. It is critical that such language which refers to a system based approach to certification as opposed to a lot-by-lot testing approach be maintained.

2. Title of Certificate**Proposed change:**

The explanatory notes should include a sub-section on “Title” under the heading “Specific” which indicates that the title should reflect the intended use of the certificate. For example, the term “sanitary” should be incorporated in the title when the certificate is intended to provide assurances pertaining to food safety.

Rationale for Proposed Change:

Canada notes that the Generic Model Certificate is intended to address sanitary aspects as well as aspects relating to fair practices in food trade. Given that the term “sanitary” is commonly used and recognized by countries for certificates which are intended to address food safety aspects, provision should be made in the Generic Model Certificate, to use the term “sanitary” in the title of the certificate, as appropriate.

3. Section 10: Declared Point of Entry**Proposed Change:**

Canada proposes that Section 10: “declared point of entry” be deleted from the Generic Model Certificate.

Rationale for Proposed Change:

This type of information may not be known by the exporter and therefore result in delays in the issuance of the certificate. Also, if known, this type of information could be subject to change after issuance of the certificate, thereby necessitating a replacement of the original certificate and resulting in extra workload for certifying officers and those involved with the administration of certificates.

Instead of being included in the Generic Model Certificate, “declared point of entry” is information which could be provided by the importer to the competent authority of the importing country.

4. Section 15: Identification of Food Products- Commodity code (HS codes)**Proposed Change:**

Regarding information that relates to the identification of the product, Canada is of the view that reference to “Commodity Code (Harmonized System code) where appropriate” should be deleted from section 15.

Rationale for Proposed Change:

Information such as name of product, nature of product and species are sufficient. HS codes do not provide additional information for the purposes of risk management.

KENYA

Kenya would like to submit its comments as indicated in the last column on the right side of the table and we have no objection in marrying CCFICS Generic Model Certificate with the CCFPP to limit the number of certificates to be used for trade purposes.

Annex I

Comparison Between the Draft Generic Model Official Certificate (Annex to the Guidelines for Design, Production, Issuance and Use of Generic Official Certificates – CAC/GL 38-2001) and The Model Certificate for Fish and Fishery Products (CAC/GL 48-2004)

Proposed Draft Generic Model Official Certificate	Model Certificate for Fish and Fishery Products	Comments	KENYAN COMMENTS
TITLE: Generic Model Official Certificate	TITLE: Sanitary Certificate covering Fish and Fishery Products	The CCFICS model removed “sanitary” from the title of its proposed draft Generic Certificate so that certificates may also address both aspects of Codex mandate “food safety and fair fair practices in the food trade	<i>We have no objection with the proposed title</i>
COUNTRY:	Country of Dispatch	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model. “Country of Dispatch” definition: designate the name of the country of the competent authority which has the competence to verify and certify the conformity of the production of the establishments.	<i>We have no objection with the proposed statements</i>
1. Consignor/Exporter	Name and address of the consignor	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model.	
2. Certificate number	Identification number	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model.	
3. Competent authority	Competent authority	Both certificates are consistent	<i>We have no objection</i>
4. Certifying Body	Certifying Body	Both certificates are consistent	

5. Consignee/Importer	Name of consignee and address at place of destination	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model.	
6. Country of Origin	<i>Not identified</i>	Would need to be added and a decision taken as to the definition to be used. “Country of Origin” definition included in the Explanatory notes of the Proposed Generic Model: name of the country in which the products were produced, manufactured or packaged. “Country of Origin” definition taken from the GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (Codex STAN 1- 1985) under section 4.5.2 “When a food undergoes processing in a second country which changes its nature, the country in which the processing is performed shall be considered to be the country of origin for the purposes of labelling.”	
8. Place of loading	<i>Not identified</i>	Not included in Fish Certificate	<i>Can name the “Zone/loading area”</i>
9. Means of transport	Means of transport	Both certificates are consistent	
10. Declared point of entry	<i>Not identified</i>	Not included in Fish Certificate	<i>Can indicate ‘port of entry’ to cover all products</i>
		Information may change after the competent authority signed the certificate. If included in Fish certificate, may want to clearly specify that changes to this	<i>Competent Authority for all produce is required for the purpose of traceability.</i>

		section do not require replacement certificates.	
11. Conditions for transport/storage	Temperature required during storage and transport	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model.	<i>Temperature to be indicated for every products during storage and transit-very crucial</i>
12. Total Quantity* if required	<i>Not identified</i>	Not included in Fish Certificate	<i>To be included and should not be optional</i>
13. Identification of container(s)/Seal number (s):	<i>Not identified</i>	Not included in Fish Certificate	<i>To be included</i>
14. Total number of packages	<i>Not identified</i>	Not included in Fish Certificate	<i>To be included</i>
Nature of the food, commodity code (HS code) where appropriate	<i>Not identified</i>	Not included in Fish Certificate	<i>To be included</i>
Species*	Species (scientific name)	Both certificates are consistent	
Intended purpose	<i>Not identified</i>	Not included in Fish Certificate As the intent is to specify the end use of the product (e.g. direct human consumption) only minor changes needed to add this information on the Fish Model Certificate.	<i>To be included</i>
Producer/Manufacturer	Address(es) and/or the Registration number(s) of production establishments(s) authorized for exports by the competent authority	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model.	<i>To be edited carefully so it does not lose its meaning and at the same time to cover all the products.</i>
Approval number of establishments*	Address(es) and/or the Registration number(s) of	Similar concepts in both certificates. Minor editing to Model Fish	

	production establishments(s) authorized for exports by the competent authority	Certificate to accept the wording proposed in the Generic Model.	
Region or compartment of origin	Not identified	Not included in Fish Certificate	Can mention the FAO zones/regions
Name of the product	Description of product	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model.	<i>Name of the products has been mentioned in codex standards for labelling food for pre-packaged and most of fish standards cover this.</i>
Lot identifier*	Lot identifier/date code	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model.	
Type of packaging	Type of packaging	Information on both certificates. No changes required.	
Number of packages	Number of packages	Information on both certificates. No changes required.	
Net weight	Net weight	Both certificates are consistent	
16. Attestations:	IV. ATTESTATION 1) The products described above originate from (an)	No attestations provided in the proposed Generic Model certificate, which could result in extensive discussions during	

	<p>approved establishment(s) that has been approved by, or otherwise determined to be in good regulatory standing with the competent authority in the exporting country and 2) have been handled, prepared, or processed, identified, stored and transported under a competent HACCP and sanitary programme consistently implemented and in accordance with the requirements laid down in Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003)</p>	<p>negotiations between the exporting and importing country. Having Codex language will simplify negotiations on attestation in certificates and promote a system approach and not a lot by lot testing.</p>	
17. Certifying officer	Heading not identified	Not included in Fish Certificate	<i>To be included -Certifying officer responsible for signature: name, official position, official stamp, date of signature and signature.</i>
Name	Name and official position	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model	
Date	Date	Information on both certificates. No changes required.	
Official Stamp	Seal	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed	

		in the Generic Model.	
Official position	Name and official position	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model	
Signature	Signature of certifying officer	Similar concepts in both certificates. Minor editing to Model Fish Certificate to accept the wording proposed in the Generic Model	

PERU

Proposed Draft Generic Model Official Certificate	Model Certificate for Fish and Fishery Products	Comments
TITLE: Generic Model Official Certificate	TITLE: Sanitary Certificate covering Fish and Fishery Products	If the Word “sanitary” is not retained in the title, at some point in the certificate a reference to the sanitary results of the product should be made
COUNTRY	Country of dispatch	
1. Consignor/Exporter	Name and address of the consignor	
2. Certificate number	Identification number	
3. Competent authority	Competent authority	
4. Certifying body	Certifying body	
5. Consignee/Importer	Name of consignee and address at place of destination	
6. Country of origin	<i>Not identified</i>	Currently is included
8. Place of loading	<i>Not identified</i>	Currently is included
9. Means of transport	Means of transport	
10. Declared point of entry	<i>Not identified</i>	
11. Conditions for transport/storage	Temperature required during storage and transport	
12. Total quantity* if requireds	<i>Not identified</i>	Not necessary as already included in point 14
13. Identification of container(s)/Seal number(s)	<i>Not identified</i>	
14. Total number of packages	<i>Not identified</i>	
Nature of the food, commodity code (HS code) where appropriate	<i>Not identified</i>	
Species*	Species (scientific name)	

Intended purpose	<i>Not identified</i>	The intended use of a product is not always known. May be Not Mandatory
Producer/Manufacturer	Address(es) and/or the Registration number(s) of production establishments(s) authorized for exports by the competent authority	
Approval number of establishments *	Address(es) and/or the Registration number(s) of production establishments(s) authorized for exports by the competent authority	Production licence?
Region or compartment of origin	<i>Not identified</i>	
Lot identifier *	Lot identifier/date code	
Type of packaging	Type of packaging	
Number of packages	Number of packages	Repeated in Number 14
Net weight	Net weight	
16. Attestations	<p>IV. ATTESTATION</p> <p>1) The products described above originate from (an) approved establishment(s) that has been approved by, or otherwise determined to be in good regulatory standing with the competent authority in the exporting country and</p> <p>2) have been handled, prepared, or processed, identified, stored and transported under a competent HACCP and sanitary programme consistently implemented and in accordance with the requirements laid down in Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003)</p>	
17. Certifying officer	Heading not identified	
Name	Name and official position	
Date	Date	
Official Stamp	Seal	
Official position	Name and official position	
Signature	Signature of certifying officer	

SOUTH AFRICA

Comments on Codex document CL 2010/48-FFP

This letter of request for comments includes CRD 3 as an attachment and our comments refer to this document.

On page 3 of this document at the bottom it refers to 16. Attestations. This requirement is absent from the Generic certificate but very specifically addressed in the fish certificate.

In the third column there is a comment on this difference which states:-

No attestations provided in the proposed Generic Model certificate, which could result in extensive discussions during negotiations between the exporting and importing country. Having Codex language will simplify negotiations on attestation in certificates and promote a system approach and not a lot by lot testing.

We fully support these comments and believe the absence of requirement for an attestation in the generic certificate specifically will result in unnecessary extension of negotiations between countries and require a lot by lot testing.

We therefore request that the Generic certificate includes a requirement for attestation and is worded exactly as per the fish certificate.-

IV. ATTESTATION

1) The products described above originate from (an) approved establishment(s) that has been approved by, or otherwise determined to be in good regulatory standing with the competent authority in the exporting country and

2) have been handled, prepared, or processed, identified, stored and transported under a competent

HACCP and sanitary programme consistently implemented and in accordance with the requirements laid down in Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003)