



MEETING FOOD SAFETY AND TRACEABILITY STANDARDS IN THE EU

By: Esther Garrido-Gamarro and John Ryder

With an import value of EUR 28 billion in 2014, the European Union is the world's biggest importer of fishery products. Exporters of fish to this market must understand the strict legal food safety and quality requirements that the EU imposes on fish imports. Traceability is also mandatory for food safety reasons and to prevent IUU fish from entering the market. This article outlines the main requirements that need to be met before fish and fish products can be exported into the EU market, noting very recent changes in the regulatory framework.

Best practices based on the Codex Alimentarius

Food has travelled around the world since ancient times, but as production and transport methods evolve, the volume and speed of trade increases and so does the risk of food borne disease. Fish needs to be handled with care, it is also the most traded commodity internationally, with fishery supply chains that can be extremely complex. For these reasons, both food safety standards and traceability are especially important for the sector to ensure that populations have access to safe fish and fishery products and that the fish they consume comes from known sources.

At the heart of food safety best practices is the Codex Alimentarius (Latin for 'Food Code'). The Codex Alimentarius is a collection of standards, guidelines and codes of practice adopted by the Codex Alimentarius Commission. The Commission, also known as CAC, is the central part of the Joint FAO/WHO Food Standards Programme and was established by FAO and WHO to protect consumer health and promote fair practices in food, with its first meeting held in 1963. (<http://www.fao.org/fao-who-codexalimentarius/standards/en/>).

The Codex standards contribute to the safety, quality and fairness of international food trade, with Codex member countries covering 99% of the world's population. The reference made to Codex food safety standards in the World Trade Organisation's Agreement on Sanitary and Phytosanitary measures (SPS Agreement) means that Codex has far reaching implications for guiding international trade and resolving trade disputes. There are many Codex standards, guidelines and codes of practices that are relevant to the fisheries and aquaculture sectors, and which provide the bases for food safety control. National legal frameworks that are consistent with Codex Alimentarius Standards are key to an effective food safety management system.

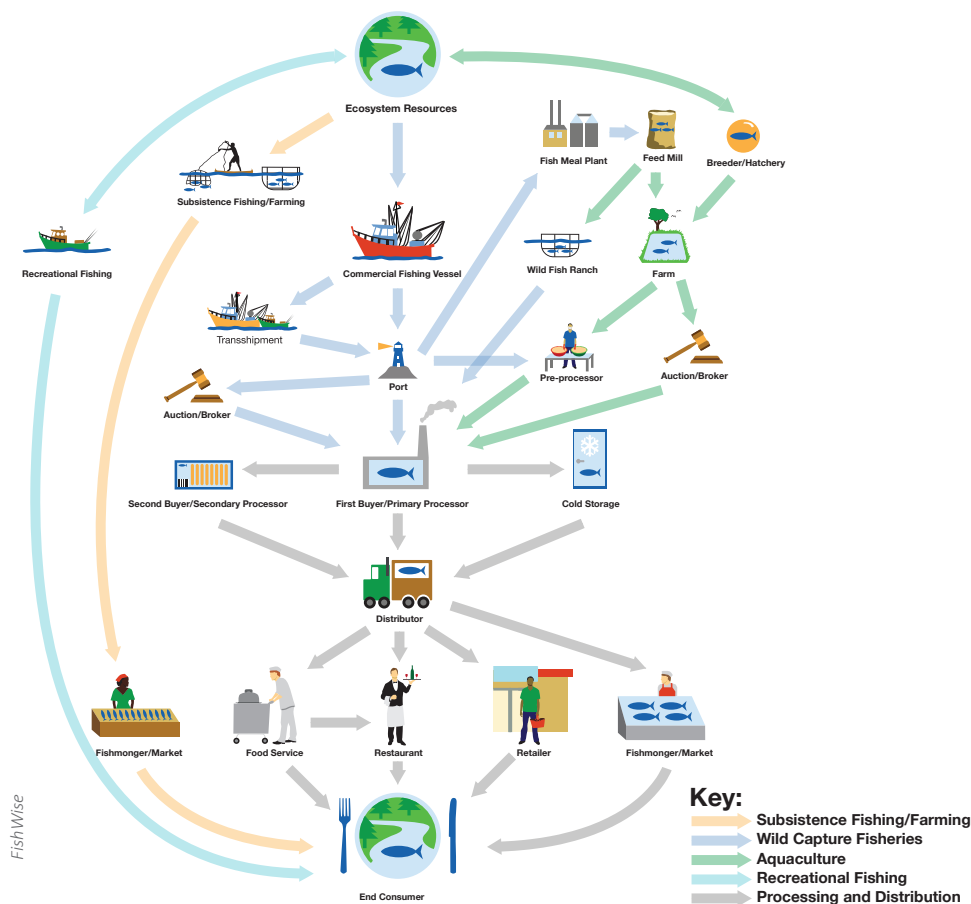
Fisheries and aquaculture products, as with any other food commodity, should meet traceability requirements as part of the food safety management system to allow business operators and authorities to recall and withdraw products when they are identified as unsafe. Traceability is mandatory for export to the EU. Codex Alimentarius texts, such as the "Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CAC/GL 60-2006)", can provide the necessary information to assist competent authorities in utilising traceability/product tracing as a tool within their food inspection and certification systems.

In recent years, in addition to food safety requirements, further traceability needs have arisen, such as for catch documentation certificates that are a tool to help combat illegal, unreported and unregulated (IUU) fishing. In this respect, labelling requirements are becoming more complex to allow consumers to see the origin and production method of fishery and aquaculture products, and to then make informed purchasing decisions.

Food safety, traceability and labelling requirements in the EU

The European Union is the world's largest importer and exporter of foodstuffs and its food safety regulations are numerous and strict to ensure safety and quality of the fishery and aquaculture products that enter the EU market. The regulatory pillar is Regulation (EC) 178/2002, and the three main instruments in the food hygiene package are Regulations 852/2004, 853/2004 and 854/2004.

The latest EU Regulation (as of 15 March 2017) for fishery products is (EC) 2017/625 on official controls of food and feed law, repealing Regulations (EC) 854/2004 and (EC) 882/2004, which will end their validity on 13/12/2019. This Regulation



General Food Law Regulation (EC) 178/2002 lays down the general principles and requirements of food law and procedures in matters of food safety, and defines the role of the European Food Safety Authority. This European agency was founded by the European Union in 2002 and it operates independently of the European legislative and executive institutions (Commission, Council, Parliament) and EU Member States. It is the EU's risk assessor and produces scientific opinions and advice that form the basis of European policies and legislation covering food and feed safety, nutrition, animal health and welfare, plant protection and plant health. It also provides definitions, principles and obligations covering all stages of food and feed production and distribution, as well as outlines the general provisions for traceability for food safety. In the hygiene package, Regulation 852/2004 lays down the general hygiene requirements for all food business operators. Regulation 853/2004 mentions additional specific requirements for food businesses dealing with foods of animal origin, including live bivalve molluscs and fishery products; and Regulation No

is relevant to the application of official controls in the area of fish and fishery products, bivalves and other shellfish.

854/2004 and 882/2004 lay down the official controls for foods of animal origin. The basis for the regulations is set down by the General Food Law Regulation (EC) 178/2002 mentioned above.

Some significant changes in the regulatory framework

1. Border Control Posts (BCPs) will replace the different Border Inspection Posts (BIPs) and Designated Points of Entry (DPEs) which currently carry out border control tasks.
2. Integrated Management System for Official Controls will allow the integration of all existing computerised systems (TRACES, RASFF, Europhyt, AAC), to optimise the handling and exchange of information, data and documents necessary for the enforcement of agri-food chain rules.
3. Permanent derogation from mandatory accreditation of official control laboratories may be introduced by Competent Authorities for laboratories having a limited scope of activities.

More information about EU Regulation (EC) 2017/625 can be found in the following link: https://ec.europa.eu/food/safety/official_controls/legislation_en

There are other legal documents such as Regulation 2073/2005 on microbiological criteria for foodstuffs; Regulation 1333/2008 on food additives used in foods; Regulation 470/2009 on procedures for the establishment of residue limits of pharmacologically active substances in foodstuffs of animal origin (which applies to aquaculture products); Regulation 1881/2006 setting maximum levels for certain contaminants in foodstuffs; and Regulation 835/2011, amending Regulation (EC) 1881/2006, laying down maximum levels for polycyclic aromatic hydrocarbons in foodstuffs. There are many other specific regulations not mentioned in this article that are relevant depending on the product category, source, fish species, etc.

It is important to highlight the relevance of laboratory requirements for official sampling and testing of fishery and aquaculture products, because ISO 17025:2005 accreditation of laboratories is a requirement that exporting countries must address, but that can take years to achieve and has enormous cost implications.

For traceability and labelling there are five main regulations: (EC)178/2002 and the related (EU) 931/2011, (EC) 1224/2009, (EU) 1379/2013 and (EC) 1005/2008 that exporters need to know about and adhere to.

(EC) 178/2002 contains the general provisions for traceability. Article 18 of the Regulation requires that the traceability for fish (in this case) must be established at all stages of production, processing and distribution, and that any food businesses must be able to identify where their fish has come from and where their fish and fish products are supplied to: this is the “one-up and one-down” principle. (EU) 931/2011 sets out the traceability requirements with regard to foods of animal origin, including fish, and identifies all the information that should be provided along the chain. This information needs to be updated on a daily basis and kept until it is reasonably likely that the food has been consumed.

Regulation (EC) 1224/2009 establishes a Community control system for ensuring compliance with the rules of the Common Fisheries Policy. Article 58 of Regulation (EC) 1224/2009 provides the framework about labelling requirements to ensure the traceability of each lot and states the minimum labelling and information for all lots of fisheries and aquaculture products. Regulation (EU) 1379/2013 is fully implemented from 13 December 2016 and contains the framework for labels accompanying all fishery and aquaculture products for EU consumers. The last requirement of this Regulation to enter into force was the nutrition declaration for prepacked product.

Regulation (EC) 1005/2008 establishes a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing in EU and international waters. Annex II of the Regulation specifies the information that the catch certificate shall contain. This information will allow authorities and business operators to know the flow of the product and prove its legality. It is important to highlight that this requirement applies to catches of marine fishery products, with the exception of aquaculture obtained from fry or larvae, ornamental fish, mussels, snails and other products of minor importance listed in Annex I of Regulation (EC) 1005/2008.

Stringent checks at EU Border Posts

There are 297 Border Inspection Posts in airports, roads and ports where food controls take place. Documentary checks for food safety purposes are carried out for all imported products, as well as identity checks to verify the accompanying documents. A physical check is required for a percentage of the products, which varies according to the product category

and for other circumstances such as repeated detection of non-compliance on specific products. The notifications are recorded in the Rapid Alert System for Food and Feed (RASFF) (<https://webgate.ec.europa.eu/rasff-window/portal/>), which provides food and feed control authorities with an electronic tool to exchange information about measures taken in response to serious risks detected in relation to food or feed. This exchange of information helps EU countries to act more rapidly and respond to a health threat caused by food or feed.

What is FAO doing in food safety and traceability-related matters?

The FAO provides support to governments in developing modern and effective national food laws and regulations. This technical support is provided through teams of legal advisors working closely with food safety experts and other food scientists. Due consideration is given to harmonising legal frameworks with WTO requirements and basing them on Codex standards, guidelines and related texts which constitute the benchmark for food safety at the international level.

Most recently, FAO has worked on the development of guidelines for catch documentation schemes to combat IUU fishing, where traceability will play an important role (see box below).



A Moroccan port inspector checks the gauge of a fishing net to ensure that it is legal

An FAO-led push to establish internationally agreed standards that can guide the development of catch documentation schemes aimed at keeping illegally caught fish off store-shelves and consumers' plates has taken an important step forward. A set of draft Voluntary Guidelines on Catch Documentation Schemes was recently unanimously adopted by a technical consultation that brought a 5-year negotiation effort to a close, and are now poised for adoption by all FAO Members at the UN agency's upcoming bi-annual governing conference (Rome 3-8 July 2017). Once approved by the Conference, the guidelines will act as an internationally-recognised "gold standard" reference for governments and businesses looking to establish systems that can trace fish from their point of capture through the entire supply chain - from "sea to plate" - in order to stop illegally caught fish from entering the marketplace.

Source: Tracking fish "from sea to plate" to keep illegal catches out of global supply chains. Published 12 April 2017 (www.fao.org)



Ms Esther Garrido-Gamarro (esther.garridogamarro@fao.org) is the Food Safety and Quality Officer working for the Products, Trade and Marketing Branch of the Fisheries and Aquaculture Department of the Food and Agriculture Organisation of the United Nations in Rome, Italy. Previous to her experience in FAO, she worked for the private sector in the food industry - in production and quality management, and also in food safety and quality certification for the agro-food department of an international certification body, where she worked with different certification schemes.



Dr John Ryder (John.ryder@fao.org) is the Branch Head of the Products, Trade and Marketing Branch of the Fisheries and Aquaculture Department of the Food and Agriculture Organisation of the United Nations in Rome, Italy. He has worked in the fisheries sector for over 35 years in many parts of the world, working for national governments, international organisations, research and development institutes and consulting companies. Over the last twenty years, he has focused on food safety issues in the fisheries sector.