



WORLD SEAFOOD CONGRESS 2023 & 13th INTERNATIONAL CONFERENCE ON MOLLUSCAN SHELLFISH SAFETY



A review of the status of official controls for the food safety of fishery products exported from African countries

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Background

EU represents the world's biggest global market for fishery and aquaculture products from African countries

- tariff preferences
- proximity to the market
- premium prices

EU has developed a modern and effective regulatory system for food safety

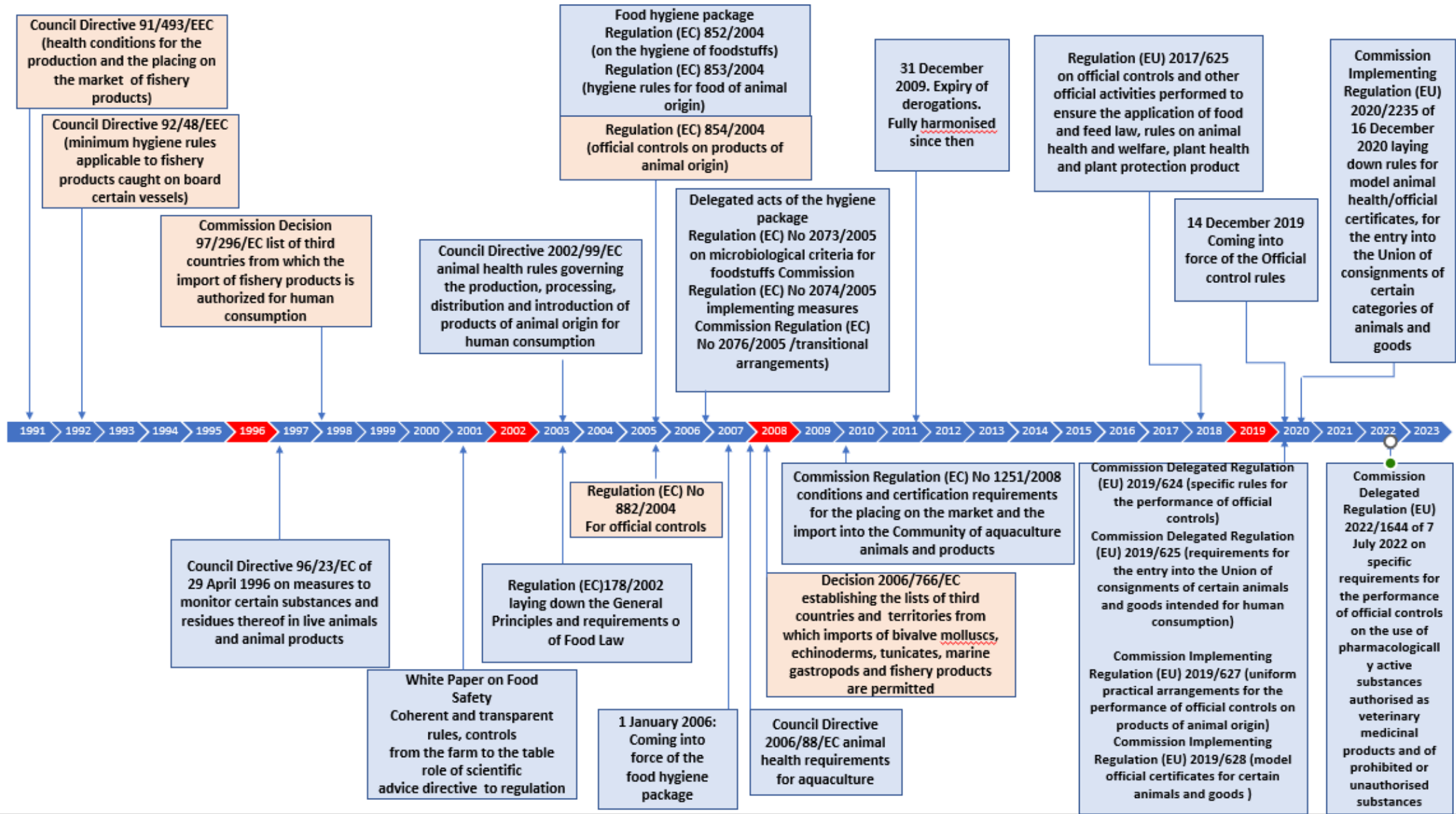
- Sanitary and Phytosanitary (SPS) Agreement
- Requirements and conditions applied to exporting countries

Routes to economic development for less developed countries

- Evolution of a sustainable trade in agriculture and fishery products
- Linking exports to small-scale operators
- Added value at all levels of supply chain
- significant impacts on incomes
- Significant impact on employment

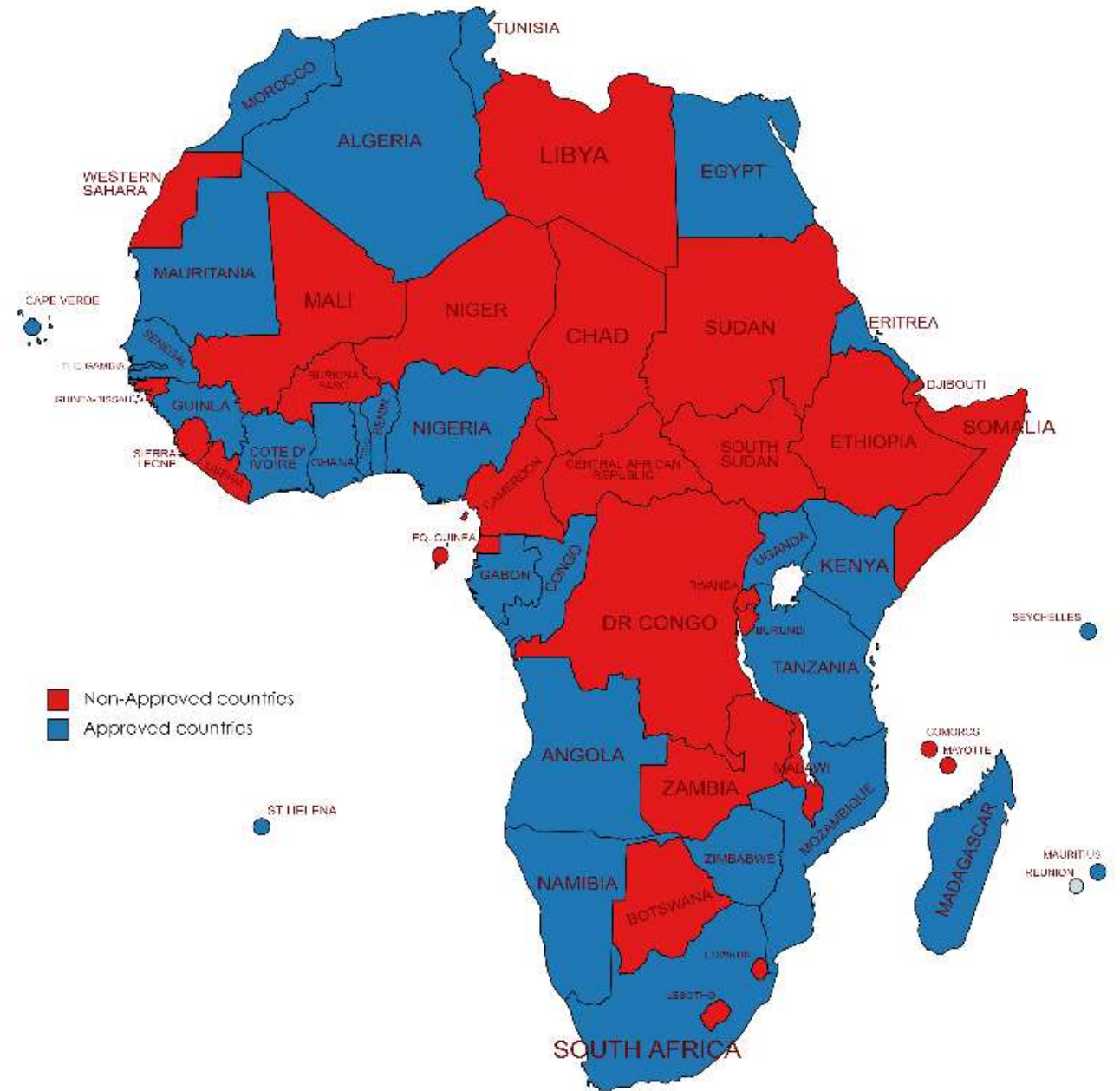


Timeline of EU food safety controls for fishery products



Responses of different African countries

- how well have African countries responded to the need to upgrade their sanitary controls for fish exports?
- what impact has this had on trade and development?
- what barriers have prevented countries with exportable resources from achieving compliance?
- what outstanding challenges remain to be addressed?



Methodology

- ✓ Review of EU sanitary requirements for fishery products
- ✓ Construction of database of compliance by 56 African countries
- ✓ Analysis of key data elements:
 - Approval status for access to the EU market
 - Product type (fish, bivalve or aquaculture products)
 - Trade value and volume in fishery products (2015-2020)
 - Approved establishments
 - RASFF Alerts in products sourced from African countries(2015-2020)
 - Calculation of indicators (RASFF alerts/US\$ thousand EU imports)
 - Qualitative data from DG SANTÉ audit reports
 - Consultant's experience

https://webgate.ec.europa.eu/sanco/traces/output/non_eu_listsPerCountry_en.htm

<https://www.trademap.org/Index.aspx>

<https://webgate.ec.europa.eu/rasff-window/portal/?event=SearchForm&cleanSearch=1>

https://ec.europa.eu/food/audits-analysis/audit_reports/

Authorisation of African third countries for export of fishery and aquaculture products

EU requirements

- ✓ Principles and need for a Competent Authority
- ✓ Legislation – equivalent food safety requirements for fishery business operators
- ✓ HACCP requirement
- ✓ System of Official controls
- ✓ Approval system
- ✓ Monitoring
- ✓ Certification (attestation of conditions of equivalence)
- ✓ Designation of accredited testing laboratories
- ✓ DG SANTÉ audits
- ✓ Additional requirements for aquaculture products (residue monitoring)
- ✓ Additional requirements for bivalve molluscs (microbiology, marine biotoxins)

Country	EU access status Annexes to Regulation 2019/626	EU access for Aquaculture products Annex to Commission Decision 2011/163	Nº of approved vessels Fish products	Nº of approved shore establishments Fish products	Nº of approved establishments ^e Live bivalve molluscs
Algeria	ANNEX II		5	40	
Angola	ANNEX II		15	0	
Benin	ANNEX II		-	-	
Cape Verde	ANNEX II		1	5	
Congo	ANNEX II ^a		2	-	
Côte D'ivoire	ANNEX II		-	8	
Egypt	ANNEX II		-	23	
Eritrea	ANNEX II		-	1	
Gabon	ANNEX II		5	1	
The Gambia	ANNEX II		-	7	
Ghana	ANNEX II		46	21	
Guinea	ANNEX II ^b		-	-	
Kenya	ANNEX II		14	15	
Madagascar	ANNEX II	Yes	44	36	
Mauritania	ANNEX II		93	104	
Mauritius	ANNEX II	Yes	5	14	
Morocco	ANNEX I / ANNEX II	Yes	309	382	12
Mozambique	ANNEX II	Yes	65	15	
Namibia	ANNEX II		61	21	
Nigeria	ANNEX II		138	29	
Saint Helena	ANNEX II ^c		3	2	
Senegal	ANNEX II		-	74	
Seychelles	ANNEX II		7	17	
South Africa	ANNEX II		222	57	
Tanzania	ANNEX II	Yes	-	14	
Tristan da Cunha ^d	ANNEX II			1	
Tunisia	ANNEX I / ANNEX II	Yes	185	129	22
Uganda	ANNEX II	Yes	-	13	
Zimbabwe	ANNEX II	Yes	-	-	

Results

Compliance is not comprehensive,
nor is it uniform across sectors and
countries

Out of the 56 identified African countries, currently 29 are approved to export fishery products to the EU, three of which have restricted access (Congo, Guinea and Saint Helena).

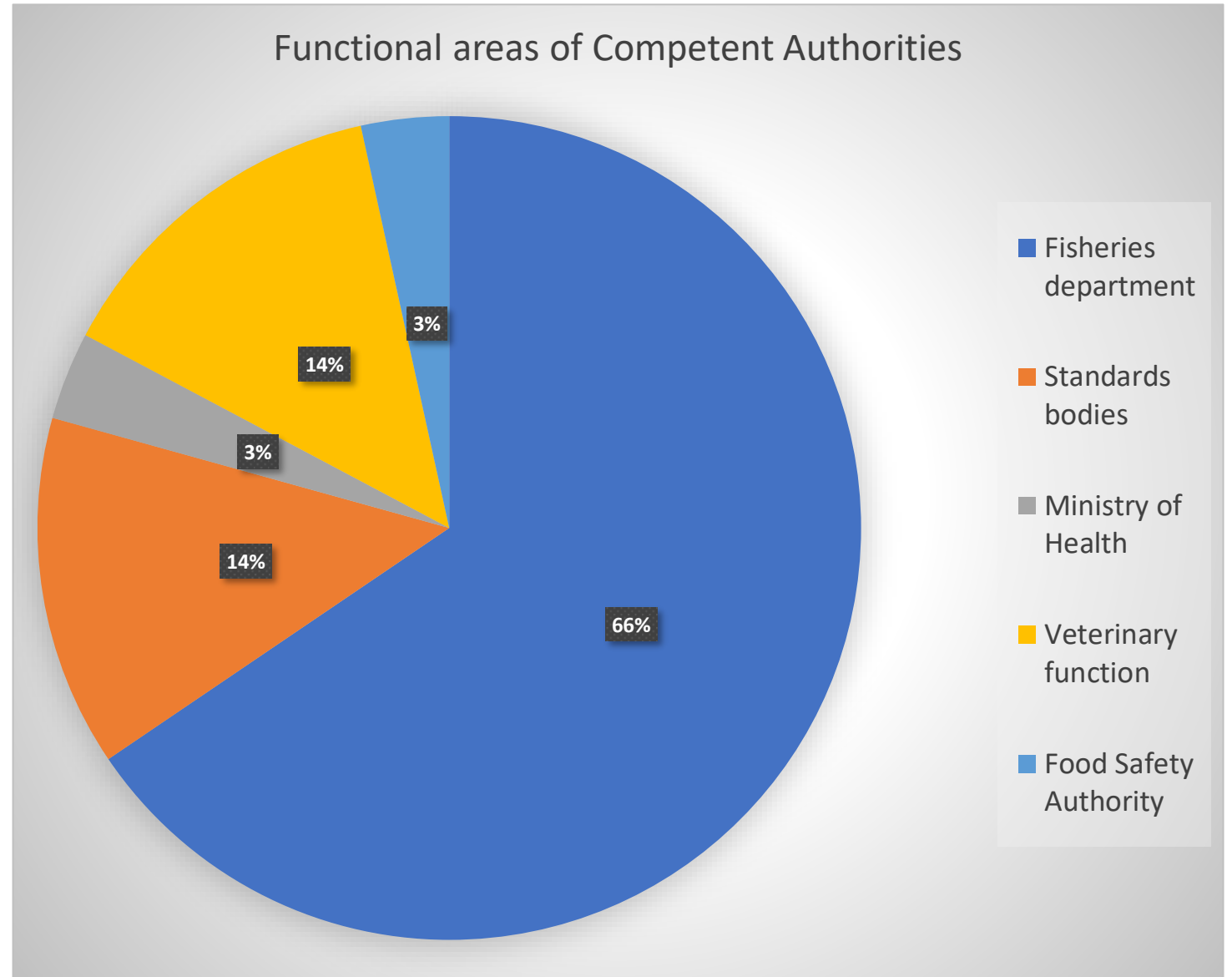
Morocco and Tunisia are the only African countries approved under Annex I of Regulation 2019/626 i.e. approved to export bivalve molluscs, echinoderms, tunicates and marine gastropods for human consumption.

8 countries have met EU requirements for veterinary medicine and residue and AAH controls and are able to supply aquaculture products

Twenty-seven African countries do not have access to the EU market, of which 12 are coastal states

Nomination of Competent Authorities

- Fisheries sectoral management bodies have been nominated by 19 countries (66%)
- 4 countries (14%) have nominated a veterinary function under the Ministry of Agriculture
- Standards bodies (or regulators linked to trade ministries) account for CAs in 4 countries
- bodies under public health functions in 1 country.
- only one country (The Gambia) has integrated their controls within a national food safety risk management authority



Impacts of market access on trade

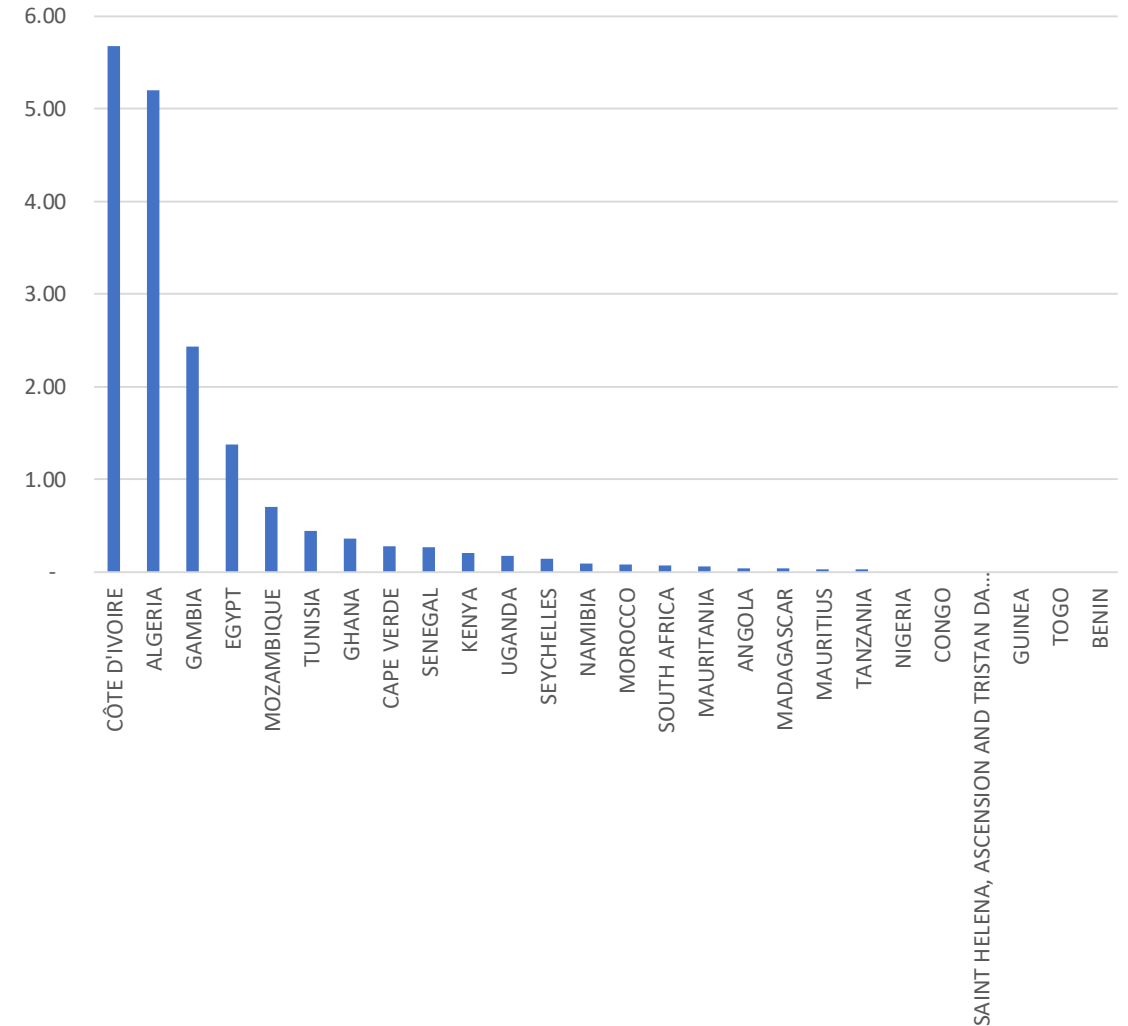
- African continent exported fish products worth an annual average of **US\$6.3 billion of which 55% was with the EU**
- Percentages of fish trade to the EU vary between 0% (for non-approved countries) to over 80% (Malawi, Cape Verde, Nigeria, and Madagascar)
- Cf. 7% of fish exports from non-approved countries to EU (non-human consumption)

Country	Exports to the EU Average (2015-2019) Thousands USD	Exports to the World Average (2015-2019) Thousands USD	% to EU
Morocco	1,256,328	1,958,091	64%
Namibia	353,903	652,735	54%
Mauritania	291,396	743,101	39%
South Africa	269,444	514,666	52%
Mauritius	221,830	401,697	55%
Seychelles	185,150	296,000	63%
Senegal	164,975	420,064	39%
Tunisia	130,712	171,072	76%
Madagascar	116,849	145,493	80%
Ghana	88,577	175,492	50%
United Republic of Tanzania	85,740	184,689	46%
Uganda	58,266	143,821	41%
Nigeria	43,725	52,280	84%
Angola	28,017	60,545	46%
Mozambique	27,170	51,425	53%
Cape Verde	14,762	17,303	85%
Kenya	14,595	27,080	54%
Egypt	6,531	41,655	16%
Algeria	4,231	17,793	24%
The Gambia	823	2,317	36%
Congo	770	4,430	17%
Côte D'ivoire	529	8,158	6%
Saint Helena, Ascension and Tristan Da Cunha	446	19,199	2%
Guinea	111	41,993	0%
Togo	84	213	39%
Mali	77	422	18%
Zambia	62	1,413	4%
Benin	31	108	29%
TOTAL	3,365,132	6,153,254	55%

Sanitary compliance levels of African fishery and aquaculture products

- Total of 410 notifications to the EU's Rapid Alert System for Feed and Food, which represents an average of just under 3 alerts per country per year
- 1 RASFF Alert for every US\$ 8.2 million of exports
- Commission has conducted a total of 91 audits in all the approved countries except for Nigeria

Av. RASSF notifications per million dollar traded
(2015-2019)



Benefits of compliance with EU Regulations

Increased social and economic benefits through a variety of routes, not all of them readily apparent:

Approval and listing of cold stores and fish processing establishments

- Listed shore operators are able to receive fishery products from EU approved freezer vessels (however flagged), and consign them to the EU, either directly (or indirectly via another third country processor).

1. Approval and listing of freezer and factory vessels

- Countries without access to the EU market find that their industrial vessels are likely to reflag to other countries with access, so that their products can be legally transhipped, consigned or processed for the EU market

1. Approval and listing of bulk refrigerated carrier vessels

- Some African countries have significant fleets of reefer vessels operating under their flag and as with fishing vessels, their inability to carry fishery products destined for the EU market severely restricts their operations and creates a disincentive for flagging to the country concerned

1. Country of despatch for other third country fishery products

- Vessels have no incentive to land product into the country in whose waters they fish if that country does not have access to the EU market.

Conclusions

- EU has introduced a fully WTO compliant shift in the concept of sanitary import controls for trade (*“at least equivalent”*)
- African fishery and aquaculture business operators and governments have invested substantially in food safety; 29 countries out of 56 (52%) currently applying food safety controls which meet the requirements
- More than 1,220 African freezer and factory vessels and 1,030 shore establishments have met EU sanitary standards
- Exports to EU market accounted for an annual average (2015-2019) of US\$3.4 billion (c. 55% of all fishery product exports from the African region)
- Despite its abundant natural fishery and aquaculture resources, ACP tariff preferences for most countries and advantageous proximity to market, Africa contributes only an 11% share (by value) of EU fishery product imports

Conclusions

- Implementing and complying with the EU sanitary legislation remains a real challenge for many African countries with significant fishery and aquaculture resources
- In African countries multiple agencies are involved in food safety controls, compliance policies are fragmented and inadequately developed (not risk-based), leading to inefficient use of limited food safety resources
- Until now, most investments linked to EU market access are made by industrial fishers and processors
- Small-scale operators generally sustain higher unit costs of market access, due to the fixed nature of sanitary compliance costs, such as higher investment, recruitment of technical staff, and sustaining HACCP and any certification systems – major barrier to entry
- Challenges could be overcome by capping investment in extraction, and focusing more on investment in safety and quality in the supply chain, such as landing and distribution facilities, building capacity of staff and collective actions in procurement of technical services, marketing, and distribution
- Building effective and efficient value chain linkages between small-scale fishers and global markets remains one of the foremost challenges for poverty reduction in African fisheries