EXPORT OF FISH AND FISHERY PRODUCTS FOR HUMAN CONSUMPTION TO TAIWAN – 8067EHC

NOTES FOR THE GUIDANCE OF OFFICIAL INSPECTORS AND EXPORTERS

1. ****IMPORTANT**** GENERAL PROCEDURES

These notes provide guidance for certifying 'Official Inspectors' (including Environmental Health Officers and Food Safety Officers of Local Authorities and Official Veterinarians acting on behalf of Defra or DAERA). These notes also provide guidance for exporters.

Completion of export health certificate 8067EHC can be carried out at the place of production/processing or at another place, such as at the airport/port of export from the UK.

Production establishments must be UK establishments approved under Regulation (EC) 853/2004 to handle fresh or processed fishery products, and can include factory and freezer vessels approved by a UK Authority.

These NFG should have been issued to an Official Inspector together with export health certificate 8067EHC. The NFG should not be read as a standalone document but in conjunction with export health certificate 8067EHC.

It is strongly recommended that exporters should obtain full details of requirements from Taiwan, or their representatives in the UK, in advance of each consignment.

2. SCOPE OF THE CERTIFICATE

Export health certificate 8067EHC must be used for the export to Taiwan of fish and fishery products, including molluscs and crustaceans, for human consumption, whether fresh, prepared or processed.

8067EHC cannot be used for the export of composite products, i.e. products containing ingredients of plant or other animal origin, added to processed or unprocessed fishery products (such as fish pies, pastas, pizzas, etc) for human consumption.

For the purposes of 8067EHC:

- 'Fishery products' means all seawater and fresh water animals including live bivalve molluscs, live echinoderms, live tunicates and live marine gastropods, whether wild or farmed, and including all edible forms, parts and products of such animals. It does not include mammals, reptiles or frogs.

- 'Fresh fishery products' are defined as unprocessed fishery products, whether whole or prepared, including products packaged under vacuum or in a modified atmosphere, that have not undergone any treatment to ensure preservation other than chilling.

- 'Prepared fishery products' means unprocessed fishery products that have undergone an operation affecting their anatomical wholeness such as gutting, heading, slicing, filleting and chopping.

- 'Processed fishery products' means processed products resulting from the processing of fishery products or from further processing of such products.

- 'Processed products' means foodstuffs resulting from the processing of unprocessed products. These products may contain ingredients that are necessary for their manufacture or to give them specific characteristics.

- ‘Processing’ means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion, or a combination of these processes.

3. CERTIFICATION BY AN OFFICIAL INSPECTOR

8067EHC may only be signed by an Official Inspector (namely, an Official Veterinarian (OV), an Environmental Health Officer or a Food Safety Officer).

4. ELIGIBILITY TO EXPORT

Paragraph II (B) refers. The list of premises approved to handle or process fishery products and live bivalve molluscs can be found at:

England/Northern Ireland/Wales:
https://www.food.gov.uk/enforcement/sectorrules/fishapprove

Scotland:
http://www.foodstandards.gov.scot/publications-and-research/approved-premises-register

5. GENERAL CONSIDERATIONS RELATING TO COMPLETION OF THE CERTIFICATE

HANDWRITTEN OR ALTERED VERSIONS OF 8067EHC SHOULD BE AVOIDED. Any insertions should be typed. The only permitted handwritten entry is the signature of the Official Inspector. If necessary, the final date of certification can be entered using an inked rubber stamp in any ink colour **OTHER THAN BLACK.**

Any authorised deletions that cannot be entered electronically or typed must be made using a ruler and a fine black pen. Diagonal deletions must NOT be used. Each line to be deleted must be ruled out providing an effect similar to that of typewritten deletions.

Certificate numbering: Each certificate will be uniquely numbered when it is issued by APHA or DAERA. Local Authority inspectors should note that they do not have to produce a separate numbering system.

The Certificate should be signed and stamped with the Official Inspector’s stamp in any colour **OTHER THAN BLACK**.

Once a certificate has been issued, a certified copy must be sent within 7 days of signature to APHA Carlisle or DAERA. The Official Inspector should keep a copy for his/her own records.

6. GUIDANCE ON CERTIFICATION STANDARDS

6.1. Export health certificate 8067EHC must be completed according to latest guidance from the Official Inspector’s/Local Authority Inspector’s regulatory body.

Additional guidance on food control at ports, and contact details for ports, is available from the Association of Port Health Authorities at:

http://www.porthealth.co.uk/index.html

Guidance for Official Veterinarians is available at:

http://www.rcvs.org.uk/advice-and-guidance/guide-to-professional-conducts-for-veterinary-surgeons/d-certification-12-principles/

The Official Inspector may wish to seek guidance from other Official Inspectors or from APHA or DAERA (see paragraph 4 above) if they need advice on completion of certain parts of this certificate.

6.2. The inspection of the products for export including documentary, identity and physical checks is at the discretion of the Official Inspector based on objective evidence and, where appropriate, the policies and procedures of the Local Food Authority. The Official Inspector must be able to justify what proportion of the consignments for export are inspected, either routinely or randomly, to be able to provide certification. An audit trail should be kept in case discrepancies with any consignment are subsequently identified and also in case audits are required. See the paragraphs below on certification procedure for further guidance.

The Official Inspector must exercise reasonable precautions and due diligence when relying on information provided by the exporter or other third parties to ensure that the information provided is correct and that certification can be carried out.

6.3. **CERTIFICATION PROCEDURE**

Completion of export health certificate 8067EHC can be carried out at the place of production/processing or at another place, such as at the airport/port of export from the UK.

If export certification is provided at a place remote from the production plant (such as an airport or port), it is the responsibility of the exporter to liaise well in advance with the certifying Official Inspectors to:

a) inform the Official Inspectors of the need for such certification and the expected timings;
and
b) ensure that all necessary documentation is provided for the Official Inspectors.

Certification is based on satisfaction of the Official Inspector that:

- The product meets the conditions of the Health Attestation in Part IV of the Export Health Certificate (See Section 10 of these Notes)
- Any supporting evidence is correct, accurate, and pertains to the product intended for export
- There are no apparent discrepancies between the consignment and the documentation accompanying it (not limited to the Export Health Certificate)

6.4. Before certification is provided, a check should be carried out to ensure full compliance with food safety requirements. A visit for these purposes is not necessary if such checks have already been made and the Official Inspector has no reason to consider that there has been a significant change since then. It is for the Official Inspector to decide if, depending on the timing of the last inspection, an additional inspection is required. For remote certification, the Official Inspector may wish to obtain confirmation of compliance from the appropriate Authority in any format agreed between the two parties.

6.5. When carrying out documentary checks, the documents with the consignment must be checked to ensure that the details of the premises of origin are correct, that those premises are EU approved, and that the documented nature of the product is consistent with the consignment. The documents should contain details of EU approval of the plant, species of the product, exporter and importer details, number of pieces and weights (gross as well as net), identification marks (e.g. batch/package numbers) and temperature of the fishery product being exported (chilled/frozen or ambient), and provide means to correlate them to the consignment.

6.6. The consignment details, for example, the number of boxes and weights, must be in conformity with the products specified on the documentation and labelling. This examination should include verification of the number of packages / boxes / containers. In large consignments, an estimate of the number of packages / boxes / containers in the consignment may be carried out.

6.7. The packaging must be new (or clean, if re-usable), in good condition, and not broken or visibly contaminated.

Broken seals or packages are not acceptable and must trigger a thorough inspection, if observed.

If any containers/boxes in a consignment are opened, this inspection must be carried out in appropriate conditions and using procedures to avoid contamination of the product.

If packaging is opened/undone during this inspection, the product should be closed/repackaged as necessary and the seal numbers amended accordingly on the documentation.

6.8. When checks, specific for export purposes or otherwise, raise concerns that export requirements are not consistently met, Official Inspectors may refuse further certification until deficiencies are rectified, or require additional checks and/or inspections to be completed, until they are satisfied that they are no longer required.

6.9. **Inconsistent information:** If documentary, identity or physical checks suggest inconsistencies between the information provided and the products for export, the Official Inspector should inform the APHA Centre for International Trade at Carlisle or DAERA.

7. PROCESSING METHOD

Paragraph I. B) refers. This paragraph can be certified from personal knowledge, if certification is provided at the place of production, or by reference to information provided by the food business operator.

8. PLACE OF ORIGIN/CATCH AREA/AQUACULTURE AREA AND CATCH VESSEL NAME

The table at paragraph II. A) refers. For each different product in a consignment, the exporter must declare whether the product was wild caught or cultured, the area of culture or catch, and for wild caught products, the name and number of the vessel.

Enter an ‘x’ in the appropriate box above the table at paragraph II. A) to indicate if aquacultured or wild caught products.

The place of origin is the smallest descriptor available:

- examples for seawater products: ‘Loch Fyne’, ‘North Sea’, ‘English Channel’, ‘Irish Sea’, ‘Atlantic Ocean’, etc.
- examples for freshwater products: ‘River Test’, ‘Loch Tay’, etc.

The Food and Agriculture Office Major Fishing Areas code must be inserted in the appropriate Catch area column (Wild Caught or Aquaculture area). See:

http://www.fao.org/fishery/area/search/en

The area coding may, as far as possible, be reduced to an area as described in the FAO link.

For freshwater / inland products the catch area / aquaculture area is ‘UK Inland’.

Not applicable boxes must be left blank.

9. HEALTH INFORMATION

9.1 **Compliance with EU and UK regulations (Paragraphs IV. (i), (ii), (iii), (iv) and (v) refer).** This may be signed on the basis of compliance with EU Regulations (EC) 178/2002, 853/2004, 854/2004 and 2073/2005, and EU directive 96/23/EC. In the UK, the EU legislation is implemented by the Food Hygiene Regulations 2006 and the Animals and Animal Products (Examination for Residues and Maximum Residues Limits) Regulations 1997. Compliance with the EU and UK Regulations can be accepted, provided the EC Identification Mark is present on the packaging of the products.

9.2 **Harmful and Foreign Substances (Paragraph IV. (iv) and (v) refer**): As regards harmful and foreign substances, the presence of the EC identification mark indicates compliance with EU rules, specifically, Council Directive 96/23/EC, which is implemented in the UK by the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 1997, and a programme referred to as the National Surveillance Scheme (NSS). On the basis of compliance with this Directive, it can be considered that animal products for human consumption do not contain levels exceeding the limits permitted in the European Union of any antibiotic/veterinary medicinal product; any beta-agonist or any substances having a thyrostatic, oestrogenic, androgenic or gestogenic action, which do not occur naturally; any pesticide; or any heavy metal, known to be harmful to human health. The NSS also covers PCBs. If satisfactory results have not been maintained, it is the responsibility of the producer/exporter to cease exporting, until satisfactory results have again been achieved.

9.3 **Microbiological Criteria (Paragraph IV. (v) and (vi) refer):** The EU has specific microbiological criteria for cooked crustaceans and molluscs – Regulation (EC) No 2073/2005 on the microbiological criteria for foodstuffs refers. This Regulation is implemented in the UK by the Food Hygiene Regulations 2006. Cooked crustaceans and molluscs must comply with these Regulations.

9.4 **Sampling for pathogenic bacteria in accordance with UK regulations (Paragraph IV. (vi) refers):** As regards pathogenic bacteria, the presence of the EC identification mark indicates compliance with EU rules, under which an established microbiological testing programme appropriate for the product concerned must be present at the processing premises, and satisfactory results must have been maintained. If satisfactory results have not been maintained, it is the responsibility of the producer/exporter to cease exporting, until satisfactory results have again been achieved.

9.5 **Sampling for Vibrio spp. (Paragraph IV. (vii) refers):** The requirement for routine sampling for Vibrio parahaemolyticus and Vibrio cholerae applies to molluscan shellfish only. It is the responsibility of the food business operator to ensure that this testing is undertaken **every 3 months** and that information on this testing is made available to the Official Inspector. The certificate should not be signed if evidence of such testing cannot be provided by the exporter to the Official Inspector.

9.6 **Supervision of aquaculture areas and monitoring for disease (Paragraph IV. (viii)refers:** Monitoring of aquaculture areas for infectious disease is carried out by UK competent authorities in accordance with EC Directive 2006/88/EC, which is in line with OIE aquatic animal health standards.

The Authorised Inspector therefore may certify the first sentence of paragraph IV (viii) regarding supervision and monitoring of the relevant aquaculture area on the basis that the aquatic environment in the UK is supervised and monitored according to OIE standards by CEFAS Fish Health Inspectorate in England and Wales, Scottish Government Fish Health Inspectorate in Scotland and DAERA in Northern Ireland.

The Authorised Inspector may certify the second sentence of paragraph IV. (viii) regarding the absence of an outbreak report of OIE listed diseases by checking the appropriate website of CEFAS, SG or DAERA for the absence of current records of the relevant diseases in the relevant aquaculture area. The relevant aquaculture area is the actual area in which the animals are farmed / aquacultured.

Authorised Inspectors should note that country clearance for absence of disease is not required and that freedom from relevant diseases can be certified providing that the OIE listed diseases relevant to the types of animals for export are not recorded as present in the area in which the animals were wild caught or farmed.

The Authorised Inspector should record the date and time that the relevant web-site(s) was accessed in case this needs to be checked in the event of an audit or if problems occur.

Information on monitoring of disease outbreaks can be found at:

https://www.gov.uk/guidance/prevent-fish-or-shellfish-diseases (England and Wales)

http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI (Scotland)

https://www.daera-ni.gov.uk/articles/fish-health-inspections (NI)

http://www.oie.int/en/our-scientific-expertise/specific-information-and-recommendations/aquatic-animals/ (OIE surveillance information)

9.7 **Freedom from clinical signs of diseases and parasitic diseases (Paragraph IV. (ix) refers):**
This paragraph referring to animal diseases or parasitic diseases can be signed on the basis of the absence of clinical signs and compliance with the applicable requirements in EU law relating to aquatic animal health. If the aquatic animals for export are obviously clinically affected or obviously abnormal or obviously parasitised, the exporter should be aware that the consignment may be rejected. The exporter should therefore remove animals from the consignment which, in their judgement, are obviously abnormal or affected with parasites. This declaration is not interpreted to mean that the aquatic animals for export are free from all diseases or all parasites.
If the producer or Authorised Inspector are aware that an outbreak of disease which is caused by a zoonotic pathogen has occurred in the aquatic animals for export, exports to Taiwan must not be allowed until the outbreak has been resolved and clearance has been given by FSA/FSS.

10. CONTACT INFORMATION AND PRE-NOTIFICATION

If certification is to be provided at a place remote from the place of production (such as an airport), the exporter will need to liaise, well in advance, with the local Environmental Heath Office for the production plant and the certifying Official Inspector at the place of certification, to inform the certifying Official Inspector of the need for such certification, the expected timings, and to ensure that all necessary

contact information and required documentation is provided by the exporter (and, if required by the certifying Official Inspector, any documentation from the local Environmental Heath Office for the plant). The documents sent with the consignment must be in a format acceptable to the certifying officer. It is suggested that documents such as microbiological records (if required) may be provided electronically.

It is the exporter's responsibility to ensure that communication with the Official Inspector occurs. If this does not take place, it is likely that the export may be delayed and the consignment may then not be exported.

11. COSTS OF EXPORT CERTFICATION

Official Inspectors and exporters should note that charging for this export certification is a matter for them to agree on.

12. DISCLAIMER

This certificate is provided on the basis of information available at the time and may not necessarily comply fully with the requirements of the importing country. It is the exporter's responsibility to check the certificate against any relevant import permit or any advice provided by the competent authority in the importing country. If these do not match, the exporter should contact the APHA Centre for International Trade, Carlisle, via the link or e-mail address below:

http://www.gov.uk/government/organisations/animal-and-plant-health-agency/about/access-and-opening