

Practical Implementation of The European Union Regulations relating to Seafood Trade & Seafood Safety

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About SIPA

- **An international alliance of seafood businesses** dedicated to safety, fairness and efficiency in seafood trade and processing.
- **Support network**
Share information with other members on the issues that affect you most: seafood safety, authenticity, trade, legislation, supply and reputation.
- **Sponsored research**
SIPA regularly sponsors studies to benefit its members, their businesses and the international seafood trade. Topics of special study have included veterinary residues, illegal water addition and short weights.
- **An organisation with transparency**
SIPA is self-funded and has no government or national affiliations.
- **International connections**
SIPA has been very successful in using its international contacts to improve relations between European and international operators and authorities.



Why have import controls?

- Food safety
- Animal health the environment
- Fraud
- Equivalent standards with the EU
 - Biological hazards, including environmental hazards
 - Chemical hazards
 - Physical hazards
- Documentation (traceability and information)



The main obligations

- The main obligation: to import only seafood that is safe and legally procured
 - and to submit the goods and accompanying documentation for official controls at the border
- Seafood has to match EU standards in terms of hygiene and food safety
- Official controls at the border are set out in EU Official Controls legislation Regulation 2017/625 and its delegating and implementing acts.

The institutions of the European Union

There are 3 main institutions involved in EU legislation:

– the European Parliament

- represents the EU's citizens and is directly elected by them



– the Council of the European Union

- represents the governments of the individual member countries



– the European Commission

- represents the interests of the Union as a whole
- contains several directorates (DGs)
- such as DG SANTE, DG TAXUD and DG MARE



DG SANTE: the Health and Consumer Protection Directorate

- Food safety and consumer affairs legislation
- Correct application of food safety and animal health legislation within the EU member states
- Provides the Rapid Alert System for Food and Feed (RASFF)

Directorate F

- Directorate F is a department of DG Sante. It was previously known as the Food and Veterinary Office (FVO)
- Ensures that EU legislation on food safety and animal health is properly implemented and enforced
- Ensures that Border Controls in EU member states are conducted properly
- Ensures compliance with EU food safety and quality standards in countries that export to the EU

European Food Safety Authority (EFSA)

- EFSA provides the European Commission with independent scientific advice on all matters with a direct or indirect impact on food safety

Third countries that can export seafood to the EU

- Seafood intended for import into the EU has to originate in a country that is authorised to do so by the European Commission.
- These countries are listed in Commission Implementing Regulation (EU) [2019/626](#).
- EU-approved Third Country Establishment list.

Third Country Establishment Lists – screenshot

Food

[Section I : Meat of domestic ungulates](#)

[Section II : Meat from poultry and lagomorphs](#)

[Section III : Meat of farmed game](#)

[Section IV : Wild game meat](#)

[Section V : Minced meat, meat preparations and mechanically separated meat \(MSM\)](#)

[Section VI : Meat products](#)

[Section VII : Live bivalve molluscs](#)

[Section VIII : Fishery products](#)

[Section IX : raw milk, dairy products, colostrum and colostrum-based products](#)

[Section X : Eggs and egg products](#)

[Section XI : Frogs' legs and snails](#)

[Section XII : Rendered animal fats and greaves](#)

[Section XIII : Treated stomachs, bladders and intestines: casing only](#)

[Section XIV : Gelatine](#)

[Section XIV/XV : Treated raw material for the production of gelatine and collagen \(TCG\)](#)

[Section XV : Collagen](#)

[Section XIV/XVbis : Raw materials for the production of gelatine and collagen](#)

Semen and Embryo

[Section I : Semen centers](#)

[Section II : Embryo team](#)

Animal by-products

Section VIII : Fishery products

PDF Documents (last change date)

- [Albania \(17/06/2020\)](#) 
- [Algeria \(10/01/2020\)](#)
- [Angola \(14/12/2019\)](#)
- [Antigua And Barbuda \(13/10/2016\)](#)
- [Argentina \(19/06/2020\)](#) 
- [Armenia \(15/09/2008\)](#)
- [Australia \(19/06/2020\)](#) 
- [Azerbaijan \(17/06/2020\)](#) 
- [Bahamas \(17/06/2020\)](#) 
- [Bangladesh \(28/08/2019\)](#)
- [Belarus \(17/06/2020\)](#) 
- [Belize \(01/08/2018\)](#)
- [Bosnia and Herzegovina \(02/05/2019\)](#)
- [Brunei Darussalam \(22/11/2016\)](#)
- [Canada \(17/06/2020\)](#) 
- [Cape Verde \(02/05/2019\)](#)
- [Chile \(17/06/2020\)](#) 
- [China \(02/07/2019\)](#)

Third Country Establishment Lists – screenshot

[Section V : Petfood plants \(Including plants manufacturing dogchews and flavouring innards\)](#)

[Section VI : Game trophies plants](#)

[Section VII : Plants or establishments manufacturing intermediate products](#)

[Section VIII : Fertiliser and soil improvers](#)

[Section IX : Storage of derived products](#)

[Section X : Blood and blood products, excluding of equidae, for technical purposes other than feed for animals](#)

Veterinary

[Section XII : Other species locations](#)



- [Ecuador \(17/06/2020\)](#) 
- [Egypt \(11/11/2019\)](#)
- [El Salvador \(06/12/2018\)](#)
- [Eritrea \(18/12/2009\)](#)
- [Falkland Islands \(Malvinas\) \(04/10/2019\)](#)
- [Fiji \(18/02/2019\)](#)
- [French Polynesia \(15/10/2018\)](#)
- [Gabon \(24/11/2009\)](#)
- [Gambia \(31/10/2019\)](#)
- [Georgia \(19/03/2018\)](#)
- [Ghana \(05/08/2019\)](#)
- [Grenada \(04/02/2013\)](#)
- [Guatemala \(04/10/2019\)](#)
- [Guyana \(13/03/2019\)](#)
- [Honduras \(19/12/2018\)](#)
- [India \(05/06/2019\)](#)
- [Indonesia \(06/11/2018\)](#)
- [Iran \(Islamic Republic Of\) \(05/02/2019\)](#)
- [Israel \(04/06/2019\)](#)
- [Jamaica \(07/03/2019\)](#)
- [Japan \(17/06/2020\)](#) 

**COUNTRY
SECTION****Indonesia
Fishery products**Validity date from
10/08/2007
Date of publication
04/03/2011**00134****List in force**

Approval number	Name	City	Regions	Activities	Remark	Date of request
003.07.B	PT. Agung Jayasari Sakti	Palembang	Sumatera Selatan	PP	Aq	
010.14.A/B	PT. Balinusa Windumas	Denpasar	Bali	PP		
015.13.B/C	PT. Bumi Menara Internusa	Surabaya	Jawa Timur	PP	Aq	21/10/2009
017.13.D	PT. Candi Jaya Amerta	Sidoarjo	Jawa Timur	PP	Aq	
053.07.B	PT. Laura Indo	Palembang	Sumatera Selatan	PP	Aq	
054.07.B	PT. Lestari Magris Plant I	Palembang	Sumatera Selatan	PP		
055.10.B	PT. Lola Mina	Jakarta	Jakarta	PP	Aq	
060.13.B	PT. Mega Marine Pride	Pasuruan	Jawa Timur	PP	Aq	
087.02.B	PT. Red Ribbon Indonesia Corp.	Medan	Sumatera Utara	PP	Aq	
095.13.B	PT. Sekar Bumi I	Sidoarjo	Jawa Timur	PP	Aq	
096.13.B	PT. Sekar Bumi II	Sidoarjo	Jawa Timur	PP	Aq	
097.13.D	PT. Sekar Laut	Sidoarjo	Jawa Timur	PP	Aq	

Export seafood to the EU

- The non-EU country from which the goods originated appears on the third country list and is authorised for the particular commodity you want to import; or
- The non-EU country you are importing from is an EFTA country (Iceland, Norway or Switzerland);
- The seafood you want to import complies with all the relevant EU legislation as regards hygiene, contaminants, packaging etc.;
- The establishment (i.e. the processor, freezer vessel, factory vessel, reefer vessel or cold store) is on the approved establishment list of that country;
- If the product is of aquaculture origin, the establishment is approved to handle product of aquaculture origin. See the Annex in Decision 2011/163/EU and any subsequent amendments, and check the footnotes in the approved establishment lists;
- No specific exemptions or restrictions are in force.

Products that will undergo an official control

Products requiring a check at the EU border

[As listed in Commission Implementing Regulation (EU) 2019/2007]

- Live fish, shellfish and other marine invertebrates
- All fish, crustaceans, bivalve molluscs and their products
- Other invertebrates such as cephalopods, marine snails, sea urchins and jellyfish

The Border Control Post

- The Border Control Post (BCP) is the facility at the border, manned by official inspectors, concerned with applying official controls on imports.
- The person responsible for the consignment to be imported must ensure that the goods are presented to an appropriate BCP for inspection.
- Port health officers will then conduct **documentary, identity** and **physical** checks on the consignment.

At the Border Control Post: documentary check

- All consignments will be subjected to a documentary check.
- Health certificates and animal health certificates
 - Accompanying commercial documents such as the bill of lading, invoice and packing list
 - Any analytical reports from the country of origin.
 - Country of origin
 - Establishment mark

At the Border Control Post: identity check

- All consignments of seafood will be subjected to an identity check.
- A visual inspection to ensure that the product labels, marks and means of transport match the documentation. The port health officer will also check that:
 - seals are intact; and
 - stamps and identification marks ('health marks') are present.
 - The container will need to be opened to ensure that the product can be seen.
 - Manifests, bills of lading, waybills, packing lists and other documents accompanying the consignment may be checked.

Accompanying information

Sufficient information must accompany the consignment to allow full traceability through all stages of production, processing and distribution.

For products covered by the Fish Labelling Regulations, this would include as a minimum:

- The commercial designation of the fish species;
- The production method;
- The catch area
- The scientific name of the fish species; and
- The identification mark

The country of origin and the establishment's identification mark must be printed on each 'retail-ready' pack, whereas items that are not shelf ready require the mark and country to be displayed only on their external container.

Border Control Post: physical check

- sensory testing and laboratory testing
- Only a proportion of consignments will be physically checked
- 30% of consignments of fishery products from aquaculture
- 30% of consignments of bivalve molluscs
- 15% of consignments of fishery products other than those mentioned above
- Countries with an equivalence agreement: lower levels of checks
- Some products from some countries: higher levels of checks

At the Border Control Post: physical check

The checks are carried out according to the criteria in Article 52 of the Official Controls Regulation and Commission Implementing Regulation (EU) 2019/627 and relate to:

- organoleptic examinations;
- freshness indicators;
- histamine;
- residues and contaminants;
- microbiological checks;
- parasites; and
- poisonous fishery products.

If there is a history of non-compliance or if there is an immediate danger to public health, the consignment will be held until laboratory test results are available. Once the physical check has been completed, the port health official will reseal and stamp all opened packages.

At the Border Control Post: intensified checks

These were previously known as 're-enforced checks'.

Where a check reveals

- a 'serious or repeated infringement' or
- suspected fraudulent or deceptive practices,

this can trigger intensified checks on future consignments of the same type.

Identity and physical checks on each subsequent consignment coming from the same establishment of origin and containing the same category of goods.

- Will continue until at least 10 consecutive consignments yield satisfactory results
- Consignments tested must amount to 10 X the weight of the original consignment
- Or a maximum net weight of 300 tons, whichever is lower

At the Border Control Post: detentions and rejections

- The BCP officials may detain any consignment pending the outcome of checks.
- If any of the border checks indicate non-compliance with food safety, animal health and other requirements, the consignment will be detained.
- If the goods present a risk to human health, the operator responsible for the consignment will be ordered to re-dispatch or destroy the consignment, or subject the consignment to a special treatment that eliminates the risk.
- The operator has the right to seek a second opinion at the operator's expense and/or appeal the decision of the BCP officials.
- There is some flexibility regarding 'administrative errors'
 - Transposed numbers
 - Badly copied seal numbers
 - Etc.

The Rapid Alert System for Food and Feed (RASFF)

- The purpose of RASFF is to provide national food safety authorities with a tool for exchanging food safety information
- Alerts from other BCPs are relayed to all BCPs rapidly
- Manages the intensified checks EU wide
- RASFF information is publicly accessible
- Provides extra (non-public) information to local port authorities to allow them to assess the risk of product arriving at the border



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