

Joint Missions DG SANTE-DG MARE on Traceability and Labelling of Fishery Products

Expert Group on Fisheries Control
Workshop on traceability of Fishery products
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Background

*DG SANTE/DG
MARE*

*Common
Understanding
Paper 2012*

and

*Scoping Paper
2015*

Objectives

- *To evaluate Member State control system on*
 - **Final labelling to consumers (CMO + FIC)**
 - **Traceability throughout the whole production chain**
- *To evaluate the consistency of controls between Competent Authorities on Fisheries & Public Health*
- *To share and disseminate Findings & Good Practices within Member States*

Methodology

- *Joint missions to six Member States (UK, PT, LV, DE, FR, ES)*
- *Individual reports not published*
- *Workshop*



Main Findings

- *The control of traceability in fisheries products is **shared between different authorities** in Member States.*
- *Limited **cooperation and coordination** between fisheries and public health authorities results in relevant information not being shared.*
- *The methods used to **transmit the required information along the food chain** may vary, leading to incompatibilities, which impact directly on the efficiency and effectiveness of the traceability system from both an operator and competent authority perspective.*





Main Findings cont..

- ✓ **Merging and splitting lots after first sale.** Identified as the great risks in losing information.
- ✓ **Verification of information along the chain.** The traceability control following the “one step forward, one step back” approach does not allow the information accompanying the product to be verified in a reliable or timely way. Lack of reliability of the information transmitted can be attributed to the speed in which the transactions are carried out and the complexity of the business.
- ✓ **Language** in fisheries and food legislation may have different meanings and/or definitions.



Main Findings cont

- **Lack of effective official controls.** *The official control systems in place had not detected that operator traceability systems based on tracing and tracking the commercial flow of the fishery products, were in many cases not reliable.*
- **Gaps identified in the official control chain in some Member States.** *Gaps in the implementation of the legal requirements were identified either because the official controls don't take place or the Competent Authority responsibilities have not been defined. This will hamper any other body in verifying the accuracy of the information on the label.*
- **Consistency in the implementation of sanctions for infringements on labelling and traceability of fishery products.** *The approach to sanctions differs across the Member States visited. The effectiveness of the different systems was not assessed during these missions.*

Further particular findings, fisheries

- ◇ *Often the control of traceability products has different authorities **before and after first sale** while the Control Regulation goes beyond first sale;*
- ◇ *Often, and depending on the authority, either the **food safety or fisheries traceability** was checked.*



Good Practices

- ***Guidelines and/or manuals** for the implementation of fish and fishery products traceability covering both food legislation [Regulation EC (No) 178/2002] and fisheries legislation [Regulation (EC) No 1224/2009]. Prepared by **Authorities and/or industry**.*
- ***On-line training** on traceability provided by the Food Standard Agency which is available to all **officials**.*
- *A technical group constituted by all Competent Authorities that agreed on a **national programme for the traceability and transmission of information to the consumer** for fishery products.*
- *A **Memorandum of Understanding** between food safety and fisheries authorities.*

Good Practices cont.

- Annual **internal audit programme** to evaluate the efficiency and conformity of official controls by public health officials on traceability and final information to the consumer, including additives in fisheries products.
- **Accreditation of Food and Veterinary official control system according to ISO/IEC 17020** standard on bodies performing official controls.
- Ongoing development of **electronic traceability systems**.





Conclusions

- *Traceability inspections/documents are **time consuming** and **access** to catch registration information (fisheries **data**) is essential.*
- *Benefits to and needs for **sharing information between fisheries and food Competent Authorities** within a Member State (data bases).*
- *Differing **systems** to transmit required information every step along the chain*
 - *information passed on may not be accurate or complete*
 - *Operator traceability systems cannot be accessed by the next operator (interoperability)*





Conclusions cont.

- *Traceability system based on the approach of “**one step forward-one step back**” is in compliance with EU food legislation. However, despite being able to track a product forward and back, the information accompanying the product might not be accurate.*
- ***Gaps** were **identified** in the **official control chain** in some Member States due to official controls not taking place or the Competent Authority responsibilities not defined, which will obstruct the verification of the accuracy of information on labelling.*
- *In all Member States visited there were **established enforcement measures and sanction powers** to deal with **non-compliances** with food safety labelling and traceability requirements but different approaches to implementation*
 - *"Informal" aiming at the operators remedying the situation*
 - *Imposition of sanctions*



Summary

None of the Member States visited had a coherent fish and fishery products traceability system covering the provisions of both Regulation EC (No) 178/2002 and Regulation (EC) No 1224/2009, embracing the whole food chain. Some Member States are making significant efforts to achieve such a system.

As a consequence, final information provided to the consumer may be inaccurate or misleading.



Thanks for
your
attention



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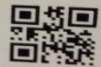
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