

TRADE FORWARD
SOUTHERN AFRICA

Removing Barriers to the Export of Farmed Shellfish from South Africa and Namibia

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WHO IS TFSA

- Trade Forward Southern Africa (TFSA) is a programme under the Foreign, Commonwealth & Development Office (FCDO) of the UK Government, promoting trade in the SACU+M region.
- Before government restructuring it sat with the Department for International Development (DFID).
- Development Alternatives Incorporated (DAI) is the lead contractor for TFSA, covering the core implementation team and all sub-activities.
- Imani Development is an implementing partner of DAI for the suite of aquaculture activities and other matters.

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SOME SECTOR BACKGROUND

South Africa farms:

- Abalone - 1657 tons in 2019 (FAO)
- Mediterranean Mussels - 3053 tons in 2019 (FAO)
- Pacific Oysters – 383 tons in 2019 (FAO)

Namibia

- Pacific Oysters - 351 tons in 2019 (FAO)



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SECTOR (MARKET) CHALLENGES

- Abalone is slow growing and are affected by marine conditions
- Market for abalone in the Far-East is becoming competitive
- Local markets for oysters and mussels are becoming saturated
- Alternative market avenues are required

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PROJECT PHASE 1 (2020)

- Consider primary barriers to shellfish export from SA and Namibia to UK/EU
 - Uncertainty around laboratory capacity
 - Farmers would gain from a better understanding of the export requirements.
 - Gaps were identified in the required regulators controls by Competent Authorities

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PROJECT PHASE 2 – IMPLEMENTATION (2021)

- Developing a database of laboratories to document capabilities and capacities, with identification of any gaps.
- Developing a compliance pack (guideline) for farmers – understanding the EU requirements
- Development of a “compliance roadmap”

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EU SANITARY REQUIREMENTS: APPLICABLE MEASURES

Requirement for “at least equivalent”

Regulation (EC) No 178/2002

Regulation (EU) 2017/625

General food safety of fishery products

Regulations (EC) No 852/2004

Regulations (EC) No 853/2004

Regulation (EU) 2021/405

Microbiological and marine biotoxin safety

Annex to Regulation (EC) No 853/2004

Commission Implementing Regulation (EU) 2019/627

Commission Delegated Regulation (EU) 2019/624

Commission Delegated Regulation (EU) 2019/625

Veterinary medicine monitoring and controls

COUNCIL DIRECTIVE 96/23/EC

Commission Decision 2011/163

Animal health

Regulation (EU) 2016/429

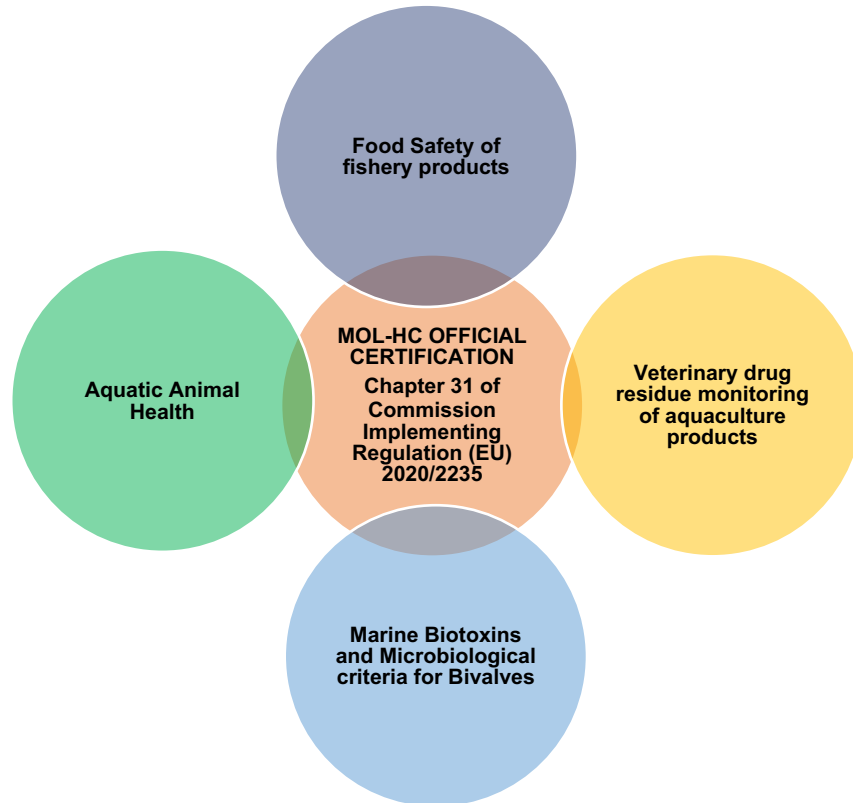
Regulation (EU) 2021/404

Certification

CIR 2019/2235

Regulation (EU) 2016/429

Regulation (EU) 2017/625



REQUIREMENTS FOR CERTIFICATION

- Food safety and animal health requirements (all issues) expressed in a single certificate (since 2020)
- Each system defined separately in EU legislation
- Difficulty for third countries is that each system may fall under a different Competent Authority
- Competent Authority must be exclusively responsible for official controls within each system (limited/conditional delegation)

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Compliance matrix (for human consumption)

Nature of product			Control system (Certification)			
			Area controls for microbiology & marine biotoxins	Aquatic Animal Health	Veterinary medicine residues	Food safety & Env. contaminants
Feeding	Origin	State	DFFE	DALRRD?	DALRRD?	NRCS
			MoFMR	MAWLR?	MAWLR?	NSI
Filter feeder (oyster & mussel)	Wild	Live	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
		Processed	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
	Aquaculture	Live	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		Processed	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Non-filter feeder (Abalone)	Wild	Live	<input checked="" type="checkbox"/> *	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
		Processed	<input checked="" type="checkbox"/> *			<input checked="" type="checkbox"/>
	Aquaculture	Live	<input checked="" type="checkbox"/> *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		Processed	<input checked="" type="checkbox"/> *		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

* Biotoxins only

Current Compliance with EU control systems for fishery and aquaculture

General Food Safety and HACCP conditions for fishery products

- In both RSA and Namibia official controls systems for general hygiene and food safety requirements for fishery products are already in place.
- South Africa and Namibia have met the requirements for the export of fishery products in general to the EU, including hygiene and Hazard Analysis and Critical Control Points (HACCP) conditions for the approval of establishments.

However:

Neither country has met the conditions for:

- Aquaculture (veterinary medicine controls and residue monitoring)
- Live bivalve molluscs, echinoderms, tunicates, marine gastropods and products of animal origin from these animals intended for human consumption (microbiological and marine biotoxin monitoring)
- Aquatic Animal Health Conditions

MARINE BIOTOXINS AND MICROBIOLOGICAL CRITERIA FOR BIVALVES

Nominate Competent Authorities for official controls of bivalve production areas and monitoring

Develop framework legislation to establish Competent Authority and mandate

Specify area control system and classification criteria
Define control powers

Develop/update legislation related to Bivalve production

Develop procedural steps for:

Sanitary surveys
Classification of areas (A,B,C)
Monitoring requirements
Closure of areas

Conduct Area classification

Implement sanitary survey
Conduct sampling and testing field surveys
Define production and relaying areas

Define monitoring programmes

Define sampling and testing for each area
Nominate /delegate bodies in charge of monitoring programme implementation
Create a laboratory network with testing capacities for programme implementation
Define reporting strategy and evaluate results
Establish notification procedures and follow up capacity for non-compliances

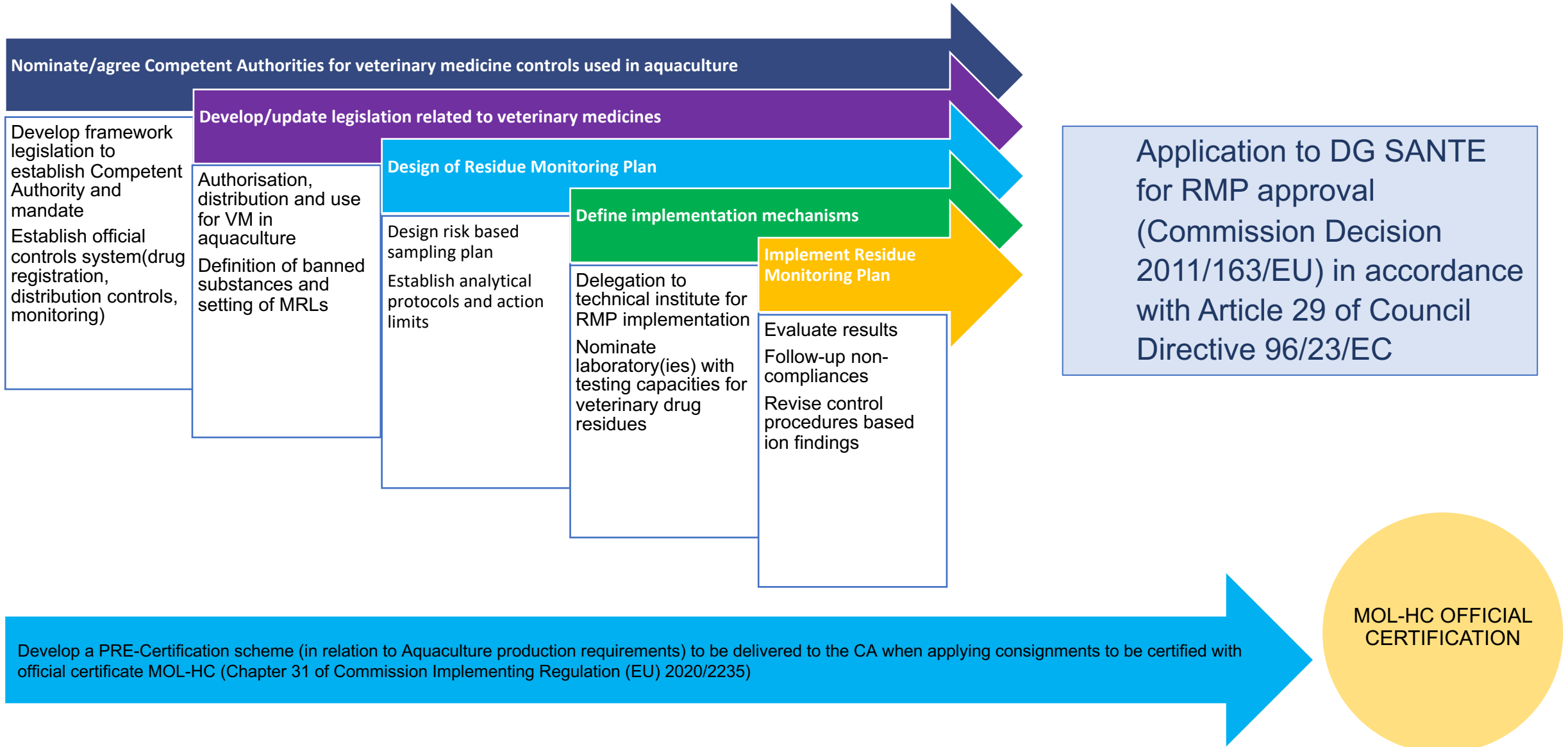
Application to DG SANTE for approval and listing under Annex I of Regulation 2019/626

NB. May be limited in scope e.g. processed gastropods only

Develop a PRE-Certification scheme (in relation to Bivalve production requirements) to be delivered to the CA when applying consignments to be certified with official certificate MOL-HC (Chapter 31 of Commission Implementing Regulation (EU) 2020/2235)

MOL-HC OFFICIAL CERTIFICATION

VETERINARY DRUG RESIDUE MONITORING OF AQUACULTURE PRODUCTS



AQUATIC ANIMAL HEALTH

Nominate Competent Authorities for Aquatic Animal Health Controls

Develop framework legislation to establish Competent Authority and mandate
Establish official controls system (listed diseases, surveillance, compartments and movement controls)

Develop/update legislation related to Aquatic animal transmissible diseases

List aquaculture diseases
Surveillance/ reporting
Obligations
Define disease free compartments

Establish surveillance mechanisms for AAH and Eradication programmes

Nominate diagnostic laboratories
Register and inspect farms
Design implement disease surveillance

Create Mechanisms for provision of Clinical inspection

Performed by an official veterinarian less than 72h before initiating transit

Application to DG SANTE for Country listing under Regulation 2016/429

Develop a PRE-Certification scheme (in relation to AAH requirements) to be delivered to the CCA when applying consignments to be certified with official certificate MOL-HC (Chapter 31 of Commission Implementing Regulation (EU) 2020/2235)

MOL-HC OFFICIAL CERTIFICATION

RECOMMENDATIONS FOR SHELLFISH OPERATORS

- Market review to determine the dimensions of EU demand for different products (production method/ species/ presentation)
- Assess the business case for establishing the required sanitary control systems to meet EU requirements, considering i) public/private investment and ii) capital/operating costs
- Prioritise development of control systems required
- Request the different National Competent Authorities to establish control systems for prioritised products/sectors (the easiest and cheapest to establish in relation to the economic value of the trade flow).

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RECOMMENDATIONS FOR COMPETENT AUTHORITIES

(FISHERY PRODUCTS, MARINE ENVIRONMENTAL MONITORING, VETERINARY RESIDUES AND AQUATIC ANIMAL HEALTH)

1. Form a committee for the coordination of management of different sanitary risks and official controls in the shellfish sector.
2. Develop and adopt a prioritised and phased action plan reflecting the expressed export priorities of the sector, to extend the current controls for export of fishery products to include, progressively;
 - i. classification and monitoring of areas for the production of bivalves;
 - ii. residue monitoring for products of aquaculture; and
 - iii. aquatic animal health controls for live bivalve filter-feeding molluscs.
3. Consider the ease of establishing the controls when deciding the phasing of the action plan (filter feeders vs non-filter feeders and capture v. aquaculture production)
4. Account also for benefits of improved controls to South African consumers (in terms of safer products) and producers (with reduced risks and impact of disease outbreaks and improved AAH)
5. Ensure that all system requirements should be expressed in new or amended regulations (to meet EU requirements for equivalence)
6. Consider a system of pre-certifications to allow each CA to fulfil its mandate, whilst delegating final signature of the EU certificate to just one CA

SECONDARY PHASE

- Deficiencies in skills around monitoring and identification of Harmful Algal Blooms



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HARMFUL ALGAL BLOOM (HAB) TRAINING COURSE

- Recognizing the worldwide need for skills, the Intergovernmental Oceanographic Commission (IOC) of the United Nations Educational, Scientific and Cultural Organization (UNESCO) launched the '**IOC Qualification in Identification and Enumeration of Harmful Microalgae**' in 1993.
- This course is presented annually by the IOC Science and Communication Centre on Harmful Algae at the University of Copenhagen, Denmark.



United Nations
Educational, Scientific and
Cultural Organization



Intergovernmental
Oceanographic
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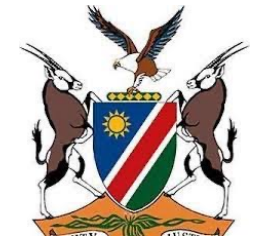
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THE TRAINING NEED

- Abalone Farmer's Association of South Africa (AFASA)
- Bivalve Shellfish Farmer's Association of South Africa (BSASA)
- Namibian Mariculture Association
- South African Food Safety Forum
- South African Department of Forestry, Fisheries and Environment
- South African National Regulator of Compulsory Standards
- Namibian Ministry of Fisheries and Marine Resources



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SECTOR BENEFITS

- Internationally recognized personnel in HAB monitoring programme.
- Credibility of monitoring programme.
- Meeting of international food safety standards
- Safer products.
- Commercial advantages around product sourcing.



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DISSEMINATION AND CONCLUSION

- Sector Workshop
- Session through Aquaculture Africa Magazine
- Presenting a Paper at AFRAQ2021
- Presenting a paper at AASA2021

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