



ACP-EU TBT Programme

090-16 - Training for Regulatory Authorities, Businesses and Communities of the ARSO Members from EAC and SADC on Risk Management in Regulatory Frameworks: Towards a Better Management of Risks

PART II – III – IV

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PART II

Fishery/Aquaculture risk management in Regulatory framework with detail in food safety



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Application of UNECE Recommendation

- Risk management could be the driving force behind the fishery/aquaculture value chain (example: food safety system, ...)
- Fishery crisis management in regulatory system could help to a ready answer to the fishery/aquaculture catastrophic events



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Fishery risk management

- Regulatory stakeholders to perform the various risk management function
- The stakeholders can properly managed the risks inside the regulatory system



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Namibian fishery chain risk management

- Balance between safety and measure that have a cost for consumers, citizens and Fishery/Aquaculture Business Operator
- Important to solve fishery value chain strategic issues



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Fishery risk management

- Risk management needs assesement survey conducted for the fishery/aquaculture system (detail in food safety and other)
- It was conducted tehoretically (training) and practically in the field (processing and landing sites) by the trainees



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Fishery risk management in Namibian regulatory framework

- International, regional and national level (landing site different risks level and regulatory framework classification) must be considered, as for import and export
- The groups mission about risk managemnt needs assessment survey, in two factory and one vessel



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Theoretical Fishery/Aquaculture risk management in a regulatory system

- Choosing the regulatory system (food safety example, aquaculture feed, but other ...)
- Traceability on the fishery supply chain and management of assets

Risk cycle	Risk consideration
Risk identification and assessment (at landing sites example)	Exposure
Risk analysis and evaluation: risk prioritisation	Sensitivity
Choosing risk treatment strategies and mitigation	Adaptation capacity



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Namibian fishery chain risk management

- Implementation the proposed risk strategies within the Fishery (FISHSAN) for Namibia
- Drafating action plan for different components
(action plan must include risk-crisis management and monitoring, review and improuing management process)



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Fishery Risk Management Strategic Action Plan for Namibia - FISHSAN -

Component	Title	Time		
C1	Legislation, regulation, manuals, standard developments, ...	Short term		
C2	Training	Medium term		
C3	Financial and support	Medium term		
C4	Communication , WG, coordination mechanism between stakeholders	Short term		
Management	Continous organisation of the action plan	Short term		



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Template FISHSAN for every Component

- **RATIONALE**
- **a Finding**

b Situation analysis

c Recommendation

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Supporting activities

- **Component 2**
- **Food Safety, Sanitary condition of aquaculture products is improved**
- Situation assessment and consultative road map development, establish working group on aquaculture food safety management among concerned ministries.
- Review and propose aquaculture food safety legislation, regulations, manual/checklists and technical national plan (chemistry, microbiology, parasitology, ...) to be harmonized with EU International Food Safety package tailored to the country's needs (MRL & Veterinary Product Limits) and training
- Training and on the job training of core senior staff of food safety system auditing in FiA and/or MIH and train core management staff on food safety management



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Template FISHSAN table

- Activity title
- Beneficiary
- Responsible
- Indicator
- Outputs
- Short description of the activity
(including risk cycle, crisis management and monitoring, review and improving management process)
- Time
- Budget
- ...



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PART III
ADDITIONAL ON FOOD
MANAGEMENT SUIRVELLANCE

PRACTICAL RISK ANALYSIS
EXEMPLE GERMANY



Regulation (EC) 882/2004

(official controls of feed and food)

Article 3 General obligations with regard to the organisation of official controls

- regular
- risk-based
- moderate frequency
- without application
- on every step of food chain

The frequency of inspection and sampling depends on the risk of the manufactured or processed fishery products

➔ risk-orientated inspection of establishment

➔ risk-orientated sampling (management of sampling)





The frequency of official controls in food business determined by
means of a risk-oriented system of assessment
based on the monitoring of 4 features
(example from Germany)


- Feature I: type of food business*
- Feature II: behavior of the food business operator regarding compliance with food regulations*
- Feature III: performance of the self monitoring system*
- Feature IV: hygiene management and granting of points for all features*





Treatment of the risk oriented food surveillance
at first: evaluation of the constant risks from a factory
→ classification of a correspondent risk category (RCat)

<i>Risk category</i>	<i>Risk</i>	<i>score</i>	<i>example</i>
<i>RCat 1</i>	<i>high</i>	<i>100</i>	<i>producer of minced meat or sushi</i>
<i>RCat 2</i>	<i>median (without direct marketing)</i>	<i>80</i>	<i>producer of food for infants</i>
<i>RCat 3</i>	<i>low (without direct marketing)/ high risk (direct marketing)</i>	<i>60</i>	<i>butcher shop</i>
<i>RCat 4</i>	<i>median risk (direct marketing)</i>	<i>40</i>	<i>bread shop</i>
<i>RCat 5</i>	<i>low risk (direct marketing)</i>	<i>20</i>	<i>honey retail</i>
<i>RCat 6</i>	<i>no risk of contamination</i>	<i>0</i>	<i>store for soft drinks and water</i>

Schema zur Risikobeurteilung von Betrieben, die der Lebensmittelüberwachung unterliegen										 Niedersachsen	
										MFB-05-334-LV2 / Version 1	
Betrieb:					Beurteiler:					Resultierende Kontrollfrequenz:	
Datum:											
Hauptmerkmal	Merkmale	Beurteilungsstufe - Risiko					max. Punkte	Ergebnis	Begründung		
		gering	Mittel			hoch					
Hauptmerkmal I	Betriebsart						120				
	1. Risikokategorie	0	nach Auswahl			100		80			
	Risikokategorie 2 (RKAT 2)										
	2. Produktrisiko	0		10		20		20			
Hauptmerkmal II	Verlässlichkeit des Unternehmers	0	3	8	9	15	15				
	1. Einhaltung LM-rechtlicher Bestimmungen	0	1	2	3	5		0			
	2. Rückverfolgbarkeit	0		2		3		0			
	3. Personal	0	2	4	6	7		0			
Hauptmerkmal III	Betriebliches Eigenkontrollsystem	0	6	12	18	25	25				
	1. HACCP-basierte Verfahren	0	3	6	9	12		3			
	2. Eigenkontrolluntersuchungen	0	1	2	3	5		1			
	3. Temperatureinhaltung (Kühlung)	0	2	4	6	8		2			
Hauptmerkmal IV	Hygienemanagement	0	10	20	27	40	40				
	1. Bauliche Beschaffenheit (Instandhaltung)	0	1	2	3	5		2			
	2. Reinigung und Desinfektion	0	2	4	6	8		4			
	3. Personalhygiene	0	3	5	8	11		3			
	4. Produktionshygiene	0	4	7	10	13		4			
	5. Schädlingsbekämpfung	0		2		3		3			
Gesamt							200	122			
pro Merkmal ist eine grau hinterlegte Beurteilungsstufe anzuklicken nur die gelb hinterlegten Felder können ausgefüllt werden											
Erreichte Risikoklasse		RK 1	RK 2	RK 3	RK 4	RK 5	RK 6	RK 7	RK 8	RK 9	

Categorization to microbiological hazard potential		
high	median	low
<ul style="list-style-type: none"> - sushi - cold smoked fish - „graved salmon“ like ceviche - fresh mussels 	<ul style="list-style-type: none"> - fresh fish - hot smoked fish - mild salted fish - cooking shrimps, crabs - frozen fishery products 	<ul style="list-style-type: none"> - Pasteurized products - hard salted products - cooking fish - surimi - dried fishery products - tinned products
<p>higher potential by biochemical / toxicological hazards:</p> <ul style="list-style-type: none"> - mussel products - fishery products with potential to biogenic amines (histamin) - subtropical „reef-fishes“ (ciguatera) 		



risk class	score	risk category						frequency				
		1	2	3	4	5	6					
1	200 – 181	200–						everyday				
2	180 – 161		180-					weekly				
3	160 – 141			160-				monthly				
4	140 – 121				140-			quarterly				
5	120 – 101					120-			every 6 month			
6	100 – 81	100	80	60	40		20	0	annual			
7	80 – 61					80						
8	60 – 41									60		
9	40 – 0										40	20



END

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PART II – III - IV

Regulatory framework in food safety and risk management



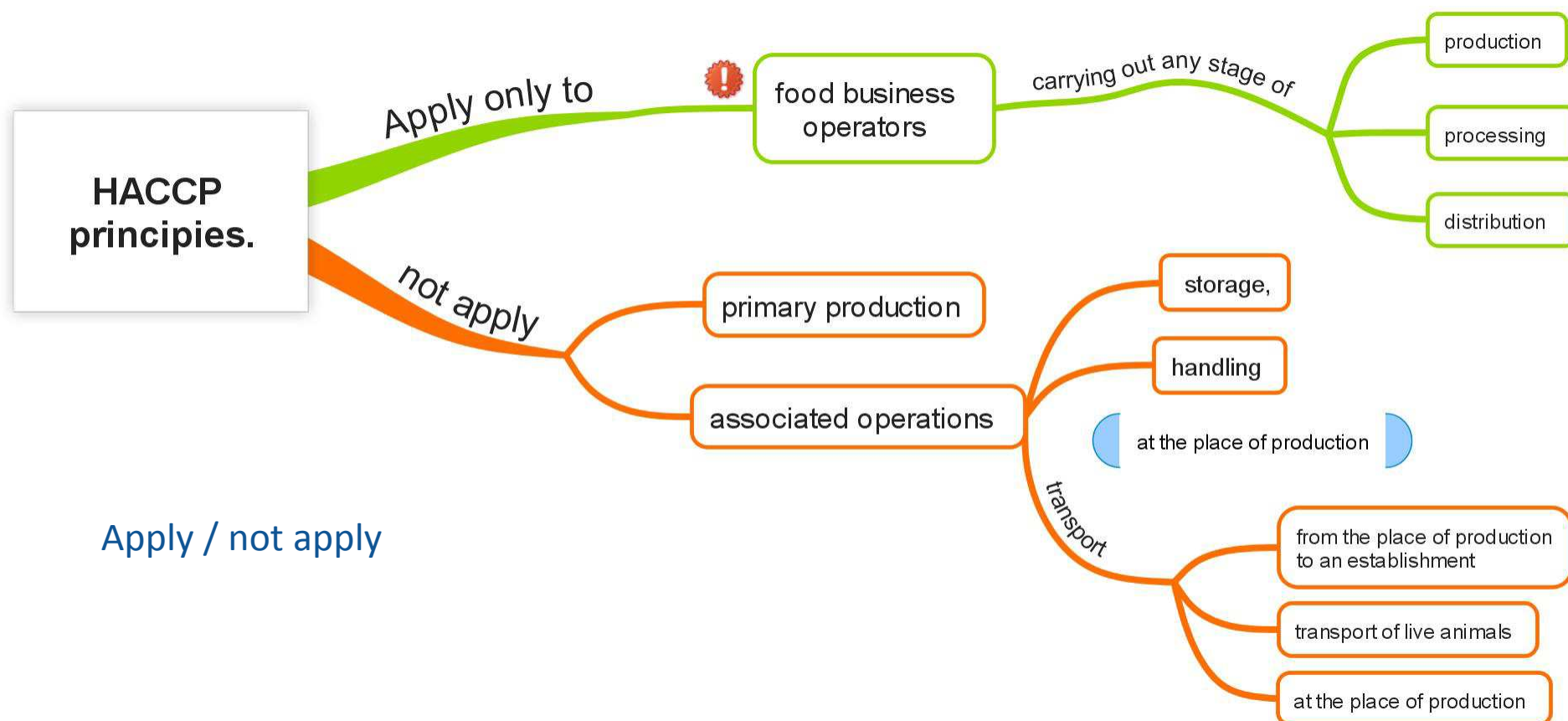
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ADDITIONAL ON HACCP

TO BE MORE CLEAR

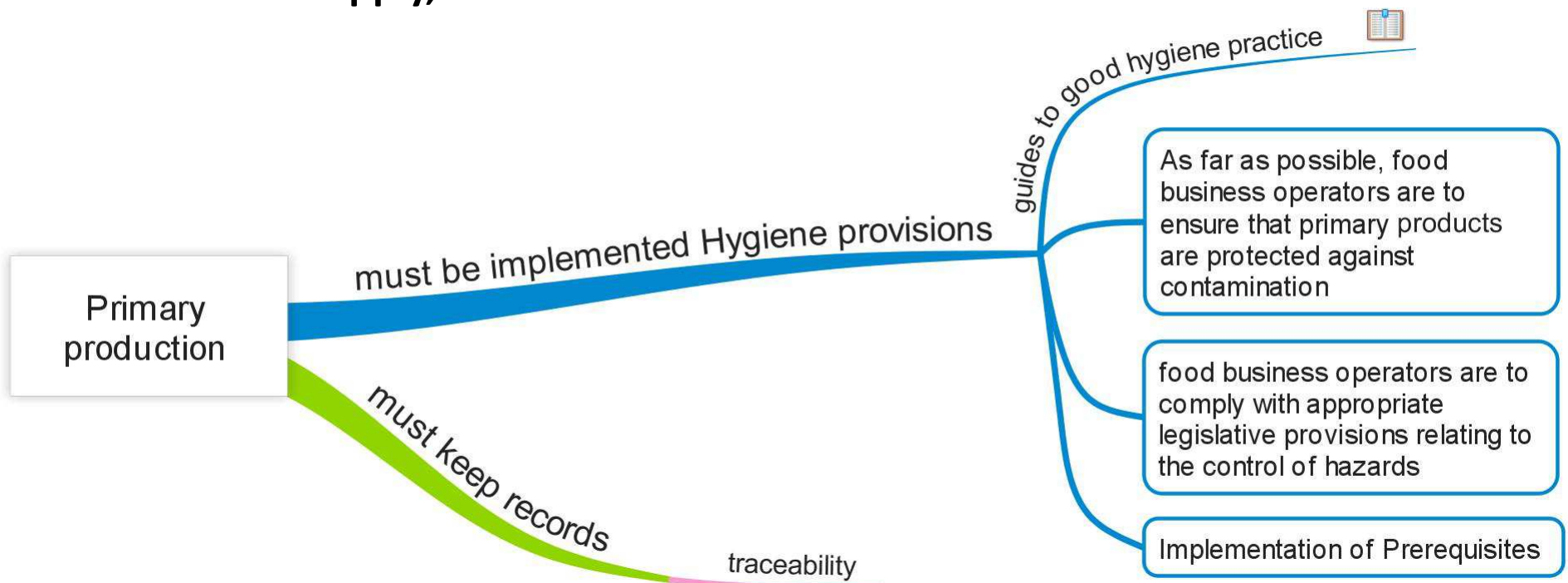
HAZARD ANALYSIS AND CRITICAL CONTROL POINTS



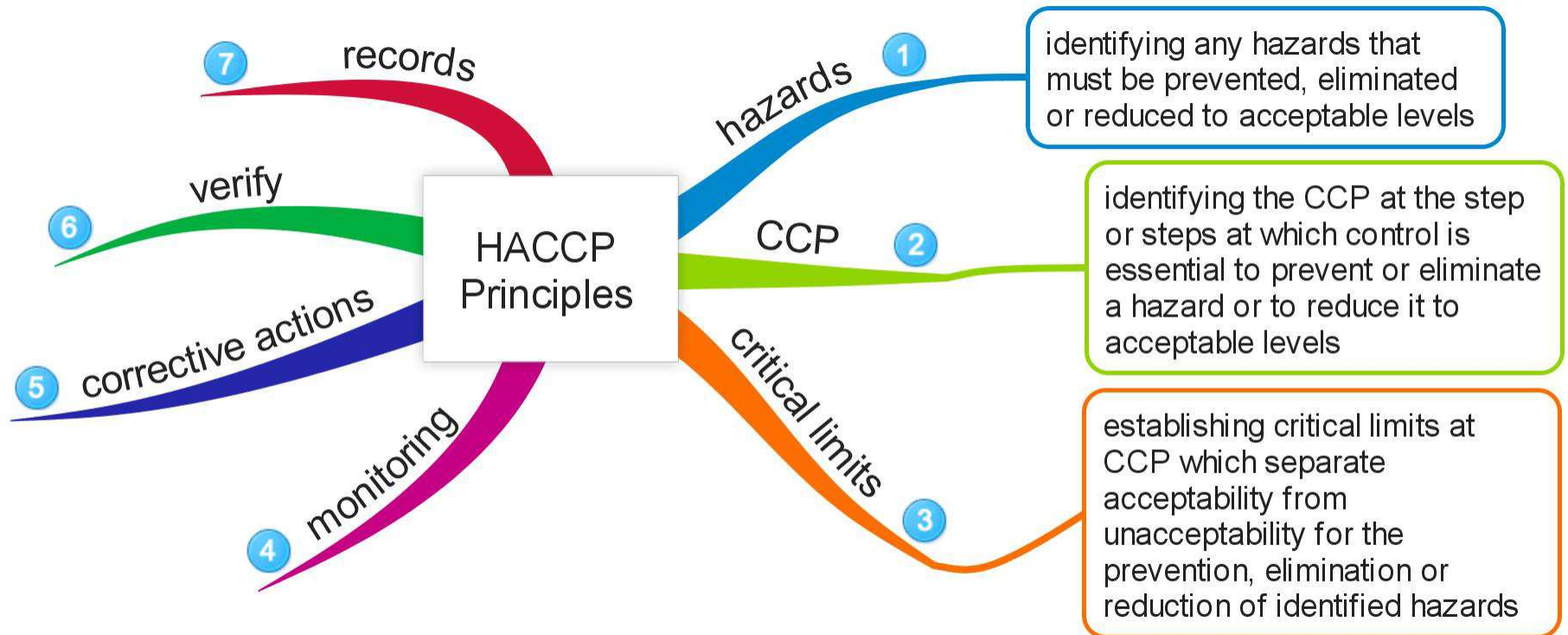
Apply / not apply

HAZARD ANALYSIS AND CRITICAL CONTROL POINTS

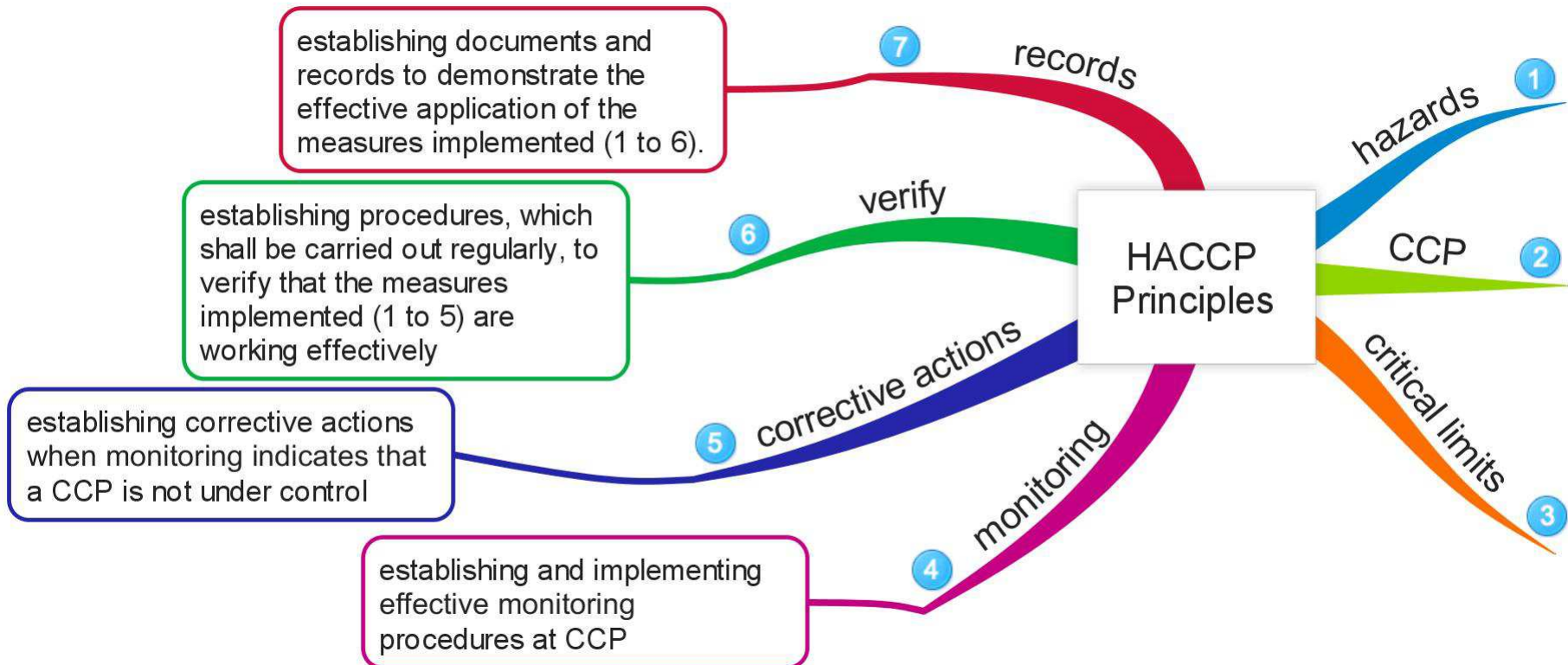
HACCP not apply, but.....



HACCP Principles Article 5 Reg (EC) 852/2004



HACCP Principles **Article 5 Reg (EC) 852/2004**





END

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