

MINISTRY OF FISHERIES
NATIONAL FISHERIES QUALITY ASSURANCE AND VETERINARY
DIRECTORATE

FOOD SAFETY CONTROL IN THE FISH PRODUCTION CHAIN

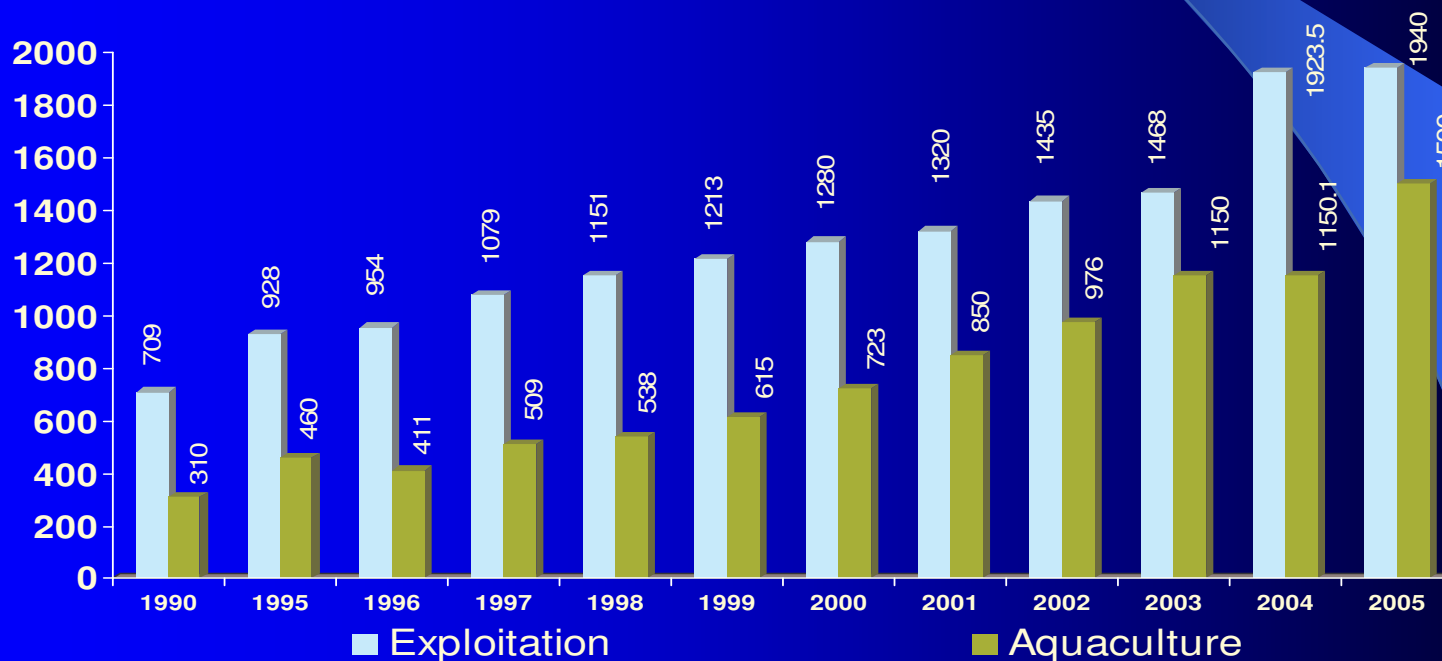
IN VIETNAM

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SUMMARY ON VIETNAM'S CURRENT SITUATION IN FISHERY PRODUCTION AND EXPORT

1.1. Vietnam's fishery production



SUMMARY ON VIETNAM'S CURRENT SITUATION IN FISHERY PRODUCTION AND EXPORT (*cont.*)

1.2. Vietnam's fishery export turnover



SUMMARY ON VIETNAM'S CURRENT SITUATION IN FISHERY PRODUCTION AND EXPORT *(cont.)*

1.4. Vietnam's policy on fishery development by the year 2010

- Production and turnover by 2010
 - Production: 4 million tons, in which:
 - Exploitation: 2 million tons
 - Aquaculture: 2 million tons
- Export turnover: 4 billion USD
- MoFI's policy:
 - Limiting the exploited production to protect the fishery resource
 - Increasing the aquaculture production, in parallel with developing the sustainable aquaculture.
 - NAFIQAVED: the competent authorities for food hygiene safety and protecting aquatic animal health \Leftrightarrow Technical Barrier to Trade (TBT) and Sanitary and Phytosanitary (SPS)

ASSIGNMENT OF STATE MANAGEMENT ON FOOD HYGIENE SAFETY AND AQUATIC ANIMAL HEALTH PROTECTION

Assignment of state management on food hygiene safety :

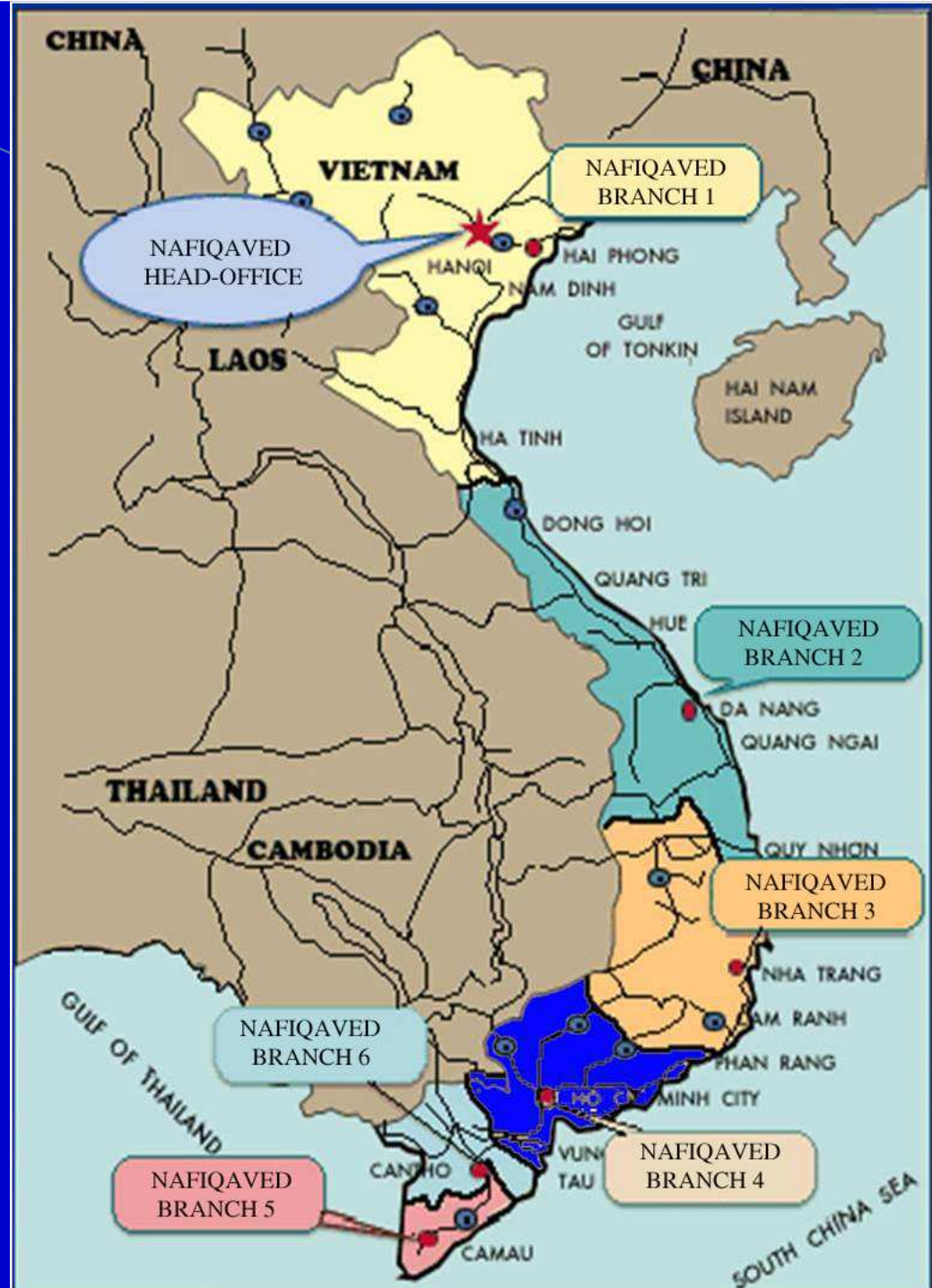
- Legal basis: Ordinance on Food Safety and documents guiding the implementation..
- Assignment of state management on food hygiene safety :
 - Ministry of Fisheries: Controlling from the stage of aquaculture to the stage of leaving the factory for export or domestic consumption (fishery materials imported for processing; additives; artificial coloring, chemicals for preservation used in fishery).
 - Ministry of Health: controlling after the stage of leaving the factory for domestic consumption (additives, artificial coloring, process-supplemented substances before placing to the market; imported fishery (without processing) for direct domestic consumption).

Assignment of state management on animal health protection:

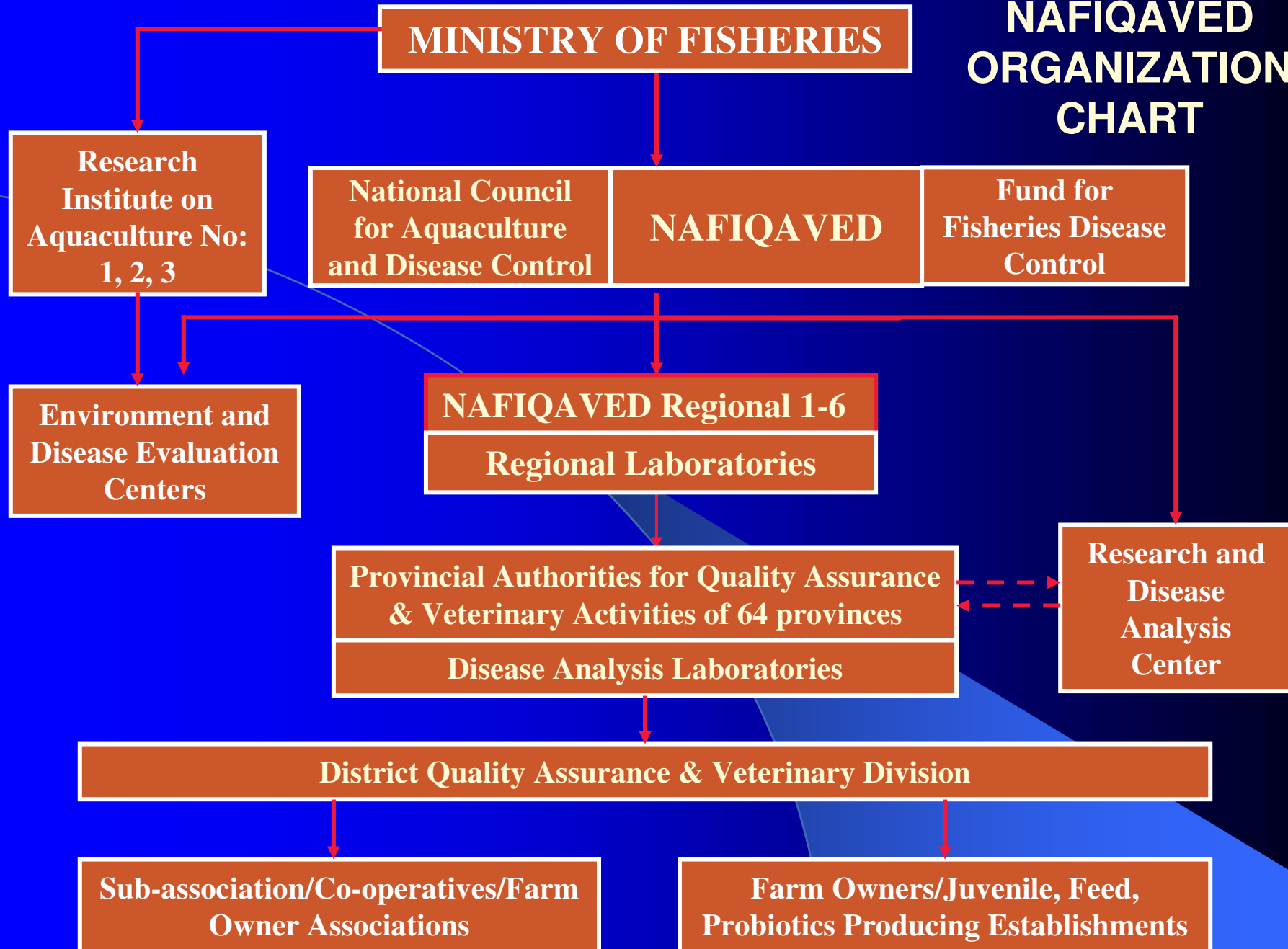
- Legal basis: Ordinance on Veterinary, Ordinance on plants, Ordinance on animals and documents guiding the implementation.
- Assignment:
 - Ministry of Fisheries : Protecting aquatic and amphibians animal health.
 - Ministry of Agriculture and Rural Development: Protecting on-land animals and plants.



Management spheres of NAFIQAVED System



NAFIQAVED ORGANIZATION CHART



FUNCTIONS, RESPONSIBILITIES OF NAFIQAVED

- **Functions:** assisting the Minister to carry out the governing of fishery quality, hygiene and safety, and veterinary from production of materials to processing, placing on the market of fishery products for the purposes of fishery disease preventives, quality and safety assurance of fisheries products.
- **Responsibilities:**
 - Building-up and submitting for the issuance of legal documents, strategy, developing plan on fishery hygiene safety and veterinary; controlling and supervising the implementation.
 - **Quality management:**
 - Controlling and recognizing the hygiene safety condition for aquaculture sites, vessels, ports, fish-markets, materials middlemen, processors, dispatchers and preservers.

Functions and responsibilities (cont.)

- Controlling, recognizing the quality and hygiene safety for fishery materials and products.
- Implementing the monitoring programs (bivalve mollusks, harmful substance residues in aquaculture...)
- aquatic animal health issues
 - Inspecting and recognizing the veterinary safety for breeds producing establishments, commercial raising establishments, feeding stuffs, chemicals, bio-products used in aquaculture.
 - Supervising and inspecting the experiment, testing (breeds, veterinary drugs, chemicals,...)
 - Inspecting and recognizing the disease of aquatic animals and amphibians.
 - Building the list of diseases that need to be quarantined, promulgating the disease, as well as the list of breeds, feeding stuffs, chemicals, bio-products used in aquaculture prohibited for import-export.
 - Carrying-out the disease prevention activities. Proposing for the disease promulgation or repeal/ wiping-out the disease/ recovering the environment after wiping-out the disease in collaboration with other concerned agencies.
- International cooperation activities, signing or submitting for the signature of cooperation arrangements; researching and applying advanced techniques in fishery hygiene safety and veterinary; Holding training and professional trainings for the staff of the whole system.
- Inspecting, controlling and punishing any violation according to the law.

FISH HYGIENE AND SAFETY CONTROL ACTIVITIES

- **Activities:**
- Inspecting hygiene safety condition of the processing establishments.
 - Controlling the application of HACCP.
 - Taking samples for the consignments.
 - Issuing certificate for the consignments.
- In case of unacceptable testing result/alerted by the importing country:
 - investigation of contamination cause
 - Placing the intensified inspection (manufacturing condition and the consignments)
 - Repealing the intensified control after the contamination cause is corrected and the testing result of 5 consecutive consignments is acceptable.

INSPECT HYGIENE CONDITIONS OF FISH PRODUCING ESTABLISHMENTS

Inspection frequency (to monitor the hygiene condition maintenance of Nafiqaved approved establishments following requirements of some importing markets):

- ❖ **A graded establishments:**
 - Twice per year inspection.
- ❖ **B graded establishments:**
 - Quarterly inspection.
- ❖ **C graded establishments:**
 - Monthly inspection.

Processing establishments

- Every lot of raw materials must be identified
- Each lot of raw materials must accompany with prohibited antibiotic certificate supplied by farmers; or be sampled for testing.

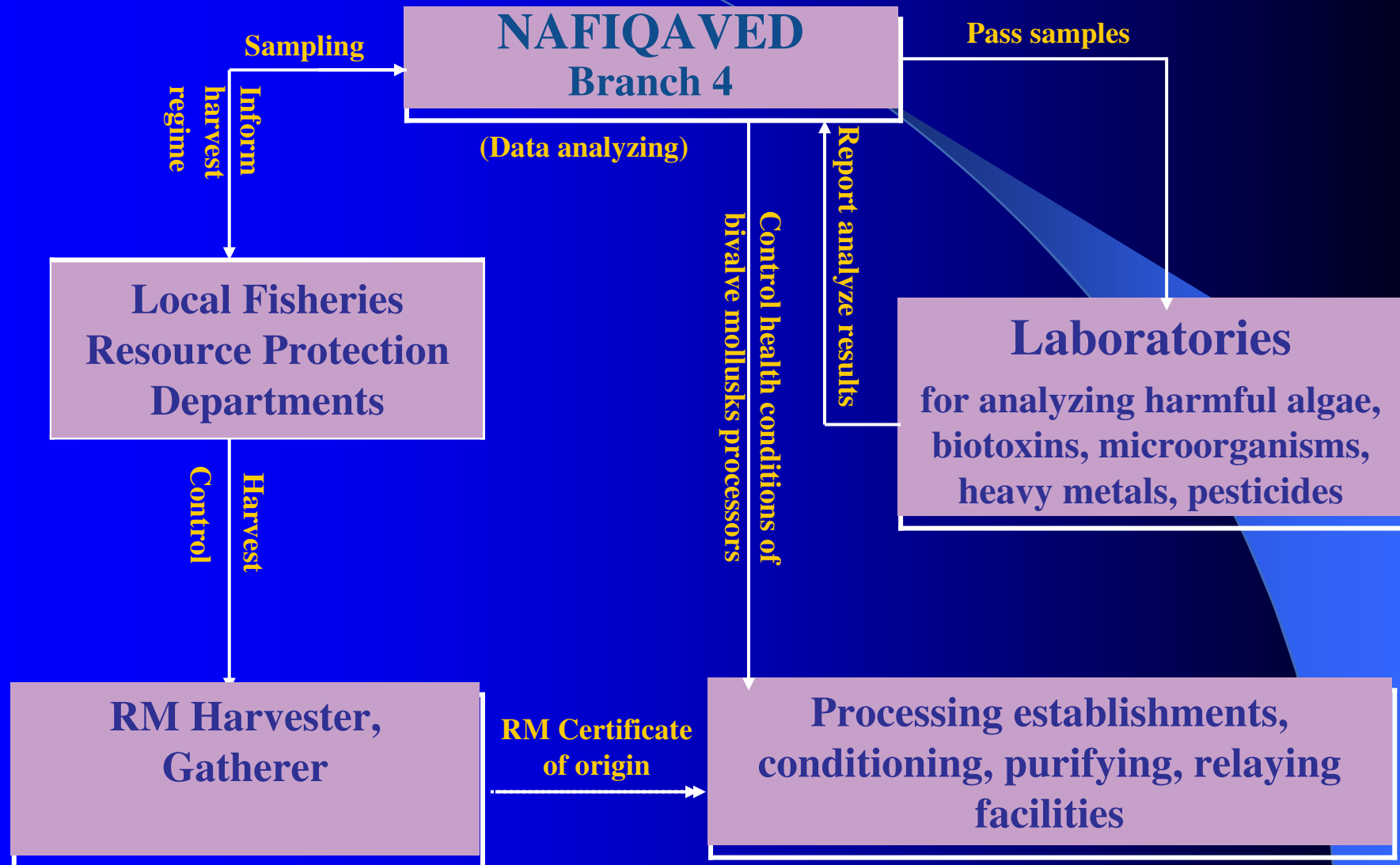
CHALLENGES

- Limitation of Education, awareness of food hygiene safety in community
- Inadequate organization model in some localities (controlling the quality of RM. in auction before going into processing plants and markets)
- Inadequate infrastructure, facilities (small business, fishing vessels, fish ports, wholesales fishing markets)

BIVALVE MOLLUSK MONITORING PROGRAM

- All countries requiring the sanitation monitoring program of bivalve mollusk harvesting areas (EU in April 2000, US in 2000,, Japan in 2000, Korea in 2001 and Canada in 2001) recognize this program of Vietnam
- 80% of Vietnamese bivalve mollusks exported to the EU. Since 2000, no consignment has been found with marine biotoxins.

BIVALVE MOLLUSK MONITORING PROGRAM



BIVALVE MOLLUSK MONITORING PROGRAM

LABORATORY PARTICIPATION

Harvest products : Bivalve Mollusk (clam, cockle...)

➤ **Chemical tests:**

Marine Biotoxins (ASP, DSP, PSP,...)

Heavy metals (Pb, Cd, Hg)

Chlorinated Pesticides

➤ **Microbiological tests:**

F.Coliforms

Salmonella

➤ **Micro algae tests:**

Toxic Algae

Harmful Algae

AREAS UNDER BIVALVE MOLLUSK MONITORING PROGRAMME (EU APPROVED)

	2000	2001	2003	2004	2005
Entire VN	3	8	12	18	18

CHALLENGES

- Strict EU requirements on some kinds of shellfish products (scallop adductor muscle products with only muscle, without intestine).

Residue Monitoring Program for harmful substances

All countries requiring the residue monitoring program of harmful substances in fisheries and their products (EU in 2000, US in 2000, Japan in 2000, Korea in 2001, Australia and New Zealand in 2003) recognize this program of Vietnam

Residue Monitoring Program of harmful substances

Legal documents:

1. **Directives No. 07/2005/TTg and No. 37/2005/TTg of the Prime Minister on controlling chemicals and antibiotics**
2. **Regulation on monitoring residues of harmful substances in fisheries and fishery products**
3. **Regulation on monitoring sanitation of bivalve mollusk harvesting areas**
4. **Decision No. 07/2005/QD-BTS dated 24 Feb. 2005 issuing the list of chemicals, antibiotics prohibited and restricted from use in fishery production and trading.**
5. **Decision No. 26/2005/QD-BTS dated 18 Aug. 2005 issuing the list of chemicals, antibiotics prohibited from use in production and trading of fishery products intended for export to the US and North of America.**
6. **Directive No. 03/2005/CT-BTS dated 7 Mar. 2005 of the Ministry of Fisheries on strengthening the control of harmful chemical and antibiotic residues in fishery activities.**
7. **Regulation (draft) on registration and circulation of veterinary drugs, environment treatment products**

Residue Monitoring Program of harmful substances

NAFIQAVED branches ACTIVITIES

- Setting up annual control plan submit to Naf. Head office.
- Cooperating with provincial Fisheries Resource Protection Departments in samplings.
- Analyzing the samples.
- Sending summarized analytical reports to Fisheries Resource Protection Departments, Naf. Head office, other Naf. Branches, fishery processing establishments...
- Inform the related bodies (provincial Fisheries Resource Protection Departments, fish processing establishments...) the harvest regime in case of violation.

Residue Monitoring Program of harmful substances

Analytical Parameters to be followed

No	Type of sample	Criteria to be analysed
1	Extensive farming – 11 criteria	<ul style="list-style-type: none"> - Organochlorinated (8 substances) - Heavy metals: Pb, Hg, Cd
2	Intensive/semi-intensive farming - 44 criteria	<ul style="list-style-type: none"> - Promoters substances: Stilbenes (DES), Methyltestosterone - Antibiotics banned for use: Chloramphenicol (CAP), Nitrofurans (NTR) - Antibiotics restricted for use: Group of Tetracycline, Sulfonamide, Quinolones - Paracides: Dipterex - Organochlorinated (8 substances) - Heavy metals: Pb, Hg, Cd - Chemicals: Malachite Green - Toxic fungus: Aflatoxine
3	Farming water: 5 criteria	<ul style="list-style-type: none"> - Antibiotics banned for use: Chloramphenicol (CAP), Nitrofurans (NTR)
4	Fishery raw materials at suppliers: 1 criterion	<ul style="list-style-type: none"> - Chloramphenicol
5	Veterinary drugs: 5 criteria	<ul style="list-style-type: none"> - Antibiotics banned for use: Chloramphenicol (CAP), Nitrofurans (NTR), Fluoroquinolone
6	Feeds for fish: 6 criteria	<ul style="list-style-type: none"> - Antibiotics banned for use: Chloramphenicol (CAP), Nitrofurans (NTR), Fluoroquinolone - Aflatoxine

AREAS UNDER RESIDUE MONITORING PROGRAMME

	1999	2000	2001	2002	2003	2004	2005
Entire VN	18	22	79	117	130	137	141

CHALLENGES

- Outdoor difficulties:
 - Differences requirements of importing markets (MRPL of prohibited antibiotic)
 - List of prohibited substances is constantly added
- Indoor difficulties:
 - Separation of small fish farms in some localities makes the restriction of collecting the samples for quality control
 - Lack of equipments to control the fish diseases in localities

Veterinary activities

Procedure of certification for veterinary drugs: (equivalent to the regulations of the EU, the US and Canada)

- Application documents must contain the following details
 - Summary of characteristics
 - Specification of quality
 - Specification, duration, safety
 - Laboratory reports of producers and of the competent authorities
 - Reports of experimentation
- Within 60 days from receipt of all regular papers, NAFIQAVED examines and submits the application documents to the Specific Science Council set up by the Ministry of Fisheries for approval, and amendment to the list of veterinary drugs, environment treatment products permitted to circulate in Vietnam
- NAFIQAVED issues certification for each product

Veterinary activities (cont.)

- inspections:
- feedstuffs and veterinary drugs producers
 - Certifying for free-antibiotic products and in compliance with labeling requirements.
 - Controlling periodically or unexpectedly the hygiene conditions of producers of veterinary drugs and feeds
 - Checking quality criteria and prohibited antibiotic residues for each lot before leaving the factory.
- feeds and veterinary drugs Suppliers
 - Must register for obtaining operational license
 - Products placed on the market must be identified
 - Local competent authorities carry out periodic and unexpected inspections, taking samples for testing and punish violations (if any).
- Fish farms
 - Implementing GAP/BMP
 - Using feeds with clear origin
 - Before harvesting, sampling and testing for harmful substances residues (especially for banned antibiotics mentioned in the Decisions 07/2005/QD-BTS and 26/2005/QD-BTS of the Ministry of Fisheries)

GAP & CoC

- GAP (Good Aquaculture Practice):
 - Reduction epidemic disease and environment pollution
 - Food safety
- ❖ GAP Pilot implementation: 8 areas/6 provinces (2 in Branch 4 area - Ben Tre province and Can Gio dist. – HCM).

- ❖ CoC (Code of Conduct):
 - Food safety
 - SPS measures, Sustainable aquaculture

GAP mandatory implementation: July 1, 2007 / January 1, 2008...

CoC mandatory implementation: January 1, 2008 / July 1, 2009...

(Decision 06/2006/QĐ-BTS on April 10, 2006: Regulation on management of safe aquaculture areas/establishments).

CHALLENGES

- Legal documents are in the process of full-made
- Lack of knowledge on management for officials
- Lack of education and knowledge on good aquaculture practices in communities
- Re-arrangement for fish farms

FURTHER ATTENTION IN THE FUTURE

1. Food hygiene safety

- **Education for communities**

2. Environment protection:

- **Policy, legal documents**
- **Preventing the contamination of environment: collaboration with other industries – Developing organic fish product programs**
- **Sustainable aquaculture – restriction of wild-catching**

COLLABORATION WITH EU TO TACKLE THE PROBLEMS

- **Food safety control**
 - **Development of Rapid Alert systems in Asia, harmonizing and link to the EU + USA Alert systems**
 - **Upgrade the competence of authorities**

COLLABORATION WITH EU AND OTHER COUNTRIES

- Environment protection:
 - Collaboration of neighboring countries and EU (mutual recognition)
 - Research of substances replacing for prohibited ones

A group of colorful fish swimming in clear blue water. There are seven fish in total. Six are a similar orange and yellow color, and one is a striped butterflyfish. The text "THANK YOU!" is overlaid in the center.

THANK YOU!

