



REPORT

Roadmap to upgrade Vietnam's SPS system in light of the EU's SPS system in relation to food, beverages, feedstuff, animals and plants

ACTIVITY CODE: EU-07

Describing EU SPS system and policy, focusing on particular aspects of specific interest for Viet Nam:

- Biosecurity;
- New labelling for foodstuffs;
- Animal welfare; and
- Traceability;

For each of the above issues, when possible a gap analysis with respect to Vietnam;

Formulate recommendations, including a roadmap¹, for progressive harmonization (with the identification of the main priorities) on each of the areas covered by the study.

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Contents

INTRODUCTION	1
Executive summary	3
Chapter 1-Activities	6
1.Biosecurity: focus on (Farmed) Fish and Aquaculture	6
2. New Labeling for foodstuffs: focus on (Farmed) Fish and Aquaculture	7
3.Animal welfare: focus on (Farmed) Fish and Aquaculture	8
4.Traceability: focus on (farmed) Fish and Aquaculture	14
5.Miscellaneous	18
5.1 Export of Honey to the EU-requirements	18
5.2 Export of fruit and vegetables to the EU-requirements	20
Chapter 2: Findings.	21
1.Biosecurity: focus on (farmed)Fish and Aquaculture	21
2. New Labeling for foodstuffs.	22
3.Animal welfare: focus on Fish and Aquaculture	27
4. Traceability: focus on (farmed) Fish and Aquaculture	27
5.Miscellaneous :	28
5.1 Export to EU of Honey	28
5.2 Export to EU of fruit and vegetables	28
Chapter 3: Conclusions	28
1.Biosecurity: focus on (farmed) Fish and Aquaculture	28
2.New Labeling for foodstuffs.	33
3.Animal welfare: focus on (farmed) Fish and Aquaculture	34
4.Traceability: focus on (farmed) Fish and Aquaculture.	34
5.Miscellaneous	35
5.1. Export to EU of Honey	35
5.2. Export to EU of fruit and vegetables	35
RECOMMENATIONS	36
1.Biosecurity	36
2. Labeling	36
3.Animal welfare	36
4.Traceability	36
Annexes	Error! Bookmark not defined.

Annexes

Annex 1: **EU/VN legislation** related to **labelling**.

Annex 2: **Guideline** on the new labeling of fish.

Annex 3a: **Table** prepared with comments to the new articles in R1169/2011, covering all kinds of food.

Annex 3b: **Table** prepared where EU R1169/2011 is compared article by article towards VN legislation for fish labelling.

Annex 4: **EU legislation** related to **Bio-Security** for farmed fish and aquaculture.

Annex 5: **EU legislation** related to **Animal Welfare** for farmed fish and aquaculture.

Annex 6: **EU/VN legislation** related to **Traceability** for farmed fish and aquaculture.

Annex 7: Exercise in labelling made on seminar.

Annex 9: Requirement for export of **fruits and vegetables/Honey to the EU (separate document)**.

Annex 10. The way forward for Vietnam (separate document).

Abbreviation	Explanation
CA(s)	Competent Authority(ies)
CAC/GL	Codex Alimentarius Commission/Guideline
CODEX	Codex Alimentarius Commission of the Food and Agriculture Organization of the United Nations and World Health Organization
CPD	Crop Production Department
DG(SANCO)	Health and Consumers Directorate-General
EFSA	European Food Safety Authority
EU	European Union
EUROSTAT	Statistical Office of the European Union
FVO	Food and Veterinary Office
GAP	Good Agricultural Practice
GC	Gas Chromatograph
GC-MS	Gas chromatograph coupled to mass spectrometer
GC-ECD	Gas chromatograph coupled to electron capture detector
GC-MS/MS	Gas chromatograph coupled to tandem mass spectrometer
HCM City	Ho Chi Minh City
HPLC-UV	High Performance liquid chromatograph coupled to ultraviolet detector
ISO	International Organisation for Standardisation
LC-MS/MS	Liquid Chromatograph coupled to tandem mass spectrometers
LOD(s)	Limit(s) of Detection
MARD	Ministry of Agriculture and Rural Development
MoH	Ministry of Health
MRL(s)	Maximum Residue Level(s)
MRM(s)	Multi-Residue Method(s)
MS(s)	Member State(s)
NAFIQAD	National Agri-Forestry-Fishery Quality Assurance Department
NCP	National Contact Point
NFSMP(s)	National Food Safety Monitoring Programme(s)
NPCTC	Northern Pesticide Control and Testing Centre
PEQ	Post-Entry Quarantine
PPD	Plant Protection Department
PPP(s)	Plant Protection Product(s)
PPSD(s)	Plant Protection Sub-Department(s)
RASFF	Rapid Alert System for Food and Feed
SOP(s)	Standard Operation Procedure(s)
SRM(s)	Single Residue Method(s)
TC(s)	Third Country(ies)

INTRODUCTION

Succeeding to the three previous MUTRAP projects, the Overall Objective of EU-MUTRAP IV is to further Vietnam's integration into the global, regional (ASEAN) and sub-regional trading systems, and to enhance the EU-Vietnam trade and investment relations, as well as to maximize the benefits from the country's economic development for an inclusive growth and poverty reduction. The purpose of the Project is to support the Ministry of Industry and Trade (MOIT) in facilitating sustainable international trade and investment through improved capacity for policy making, policy consultation, and the negotiation and implementation of related commitments, particularly vis-à-vis the European Union (EU).

EU-MUTRAP's activities are grouped in five Components corresponding to the following five results that the project has to achieve:

1. Strengthening EU-Viet Nam trade and investment relations through enhanced dialogue and co-operation, and the negotiation and implementation of a future EU-Viet Nam FTA;
2. Strengthening the institutional capacity for the negotiation and implementation of multilateral, regional and sub-regional trade commitments is strengthened;
3. Improvement of the investment policy frameworks, with a particular focus on the environmental and social issues in trade and investment related policies and legislation;
4. Improvement of access to information, regulations and market opportunities relative to Viet Nam's international trade and investment commitments; increased stakeholders participation in the trade and investment policy development process; and enhanced capacity among SMEs to comply with European market access requirements;
5. Supporting the EU-VN dialogue in economic areas of the Framework Agreement on Comprehensive Partnership and Cooperation (PCA) between the EU and Viet Nam, and provision of flexible assistance to address important urgent trade issues.

This activity, which forms part of the 1st Component, has the objective to assist Viet Nam in its efforts to continue reforming its SPS system in order to further align it to the requirements in the WTO SPS Agreement, international standards and best practices. Assistance under this and future SPS activities that may be implemented by EU-MUTRAP should improve the understanding of the EU SPS system as well as the Vietnamese regulatory and institutional framework. Activities done under EU-MUTRAP may address implementation-related issues, including highly technical matters that may affect trade, safety, quality and environmental issues. As a result of EU-MUTRAP interventions, Viet Nam is expected to improve the safety and quality of the agri-foods sold in its domestic market and increase the volume and value of exported products by improving the perception of Vietnamese products in important export markets.

The consultants started their mission on 18 May in Vietnam.

On 18 May the consultants were briefed by the Team Leader of MUTRAP and a meeting was scheduled with SPS office. The topics were: Road map for export; The new EU requirements for animal welfare; The veterinary drug issue for Vietnam; Honey export to EU and use of chloramphenicol; Rapid alert system; The new Animal Health law and the seminar for exporters. New labelling

legislation in farmed and wild caught seafood. Also labelling of food in general especially honey and plant products.

On 19 May a meeting in the morning took place with **NAFIQAD**. The topics were:
Heat process of clams for EU export; the scallop issue and export only of muscle part; the new labeling law; good aquaculture practices; residue monitoring plan. New labeling legislation in farmed and wild caught seafood

In afternoon a meeting took place with Animal Health-**MARD**. The topics were to focus on: Agriculture and well Fisheries:-food safety, aquaculture health; traceability for aquaculture and capture fish; animal welfare for catfish and shrimps; bio security in aquaculture; honey sustainable export.

On 20 May a meeting took place Plant Health-MARD.

The topics were: the lack of resources; the pest issue; pest risk assessments.

In the afternoon a briefing took place in SPS office. On this meeting the program for the WS in HCM City on June 4 was confirmed. The program/invitation is attached to this report as Annex 8. Additionally it was decided that the main subject to be treated in the report should be the following: Biosecurity, Labelling, Animal welfare and Traceability with focus on fish, honey, fruit and vegetables.

The tasks have been divided as follows between the two experts:

DMI 1: New labelling and Traceability.

DMI 2: Biosecurity and Animal Welfare.

Executive summary:

1. The mission by two experts took place between 18 May till 5 June. The mission was originally developed for 4 topics: labeling, traceability, animal welfare and bio security. And two workshops were planned. In the first week this was changed in output and the focus was mainly to Fisheries and Agriculture. Only one workshop was decided. It became clear that even when a part of the EU labeling legislation was translated into Vietnamese that the implementation has not started yet and for that reason power point presentations were developed and practical exercises were done in the workshop.

The EU animal welfare for (farmed) fish is a new topic which was presented in the above mentioned workshop and explained to the participants that this issue could be compulsory when companies export their product to EU. Animal welfare of other animals and EU requirements should be considered in a workshop to start the awareness.

1. Biosecurity

Biosecurity is very important to aquaculture because it prevents or limits the introduction and spread of disease within or between aquatic animal production facilities and sites. Since very few effective treatments are available for most aquatic animal diseases, effective biosecurity is the key to preventing these diseases.

Guidance has been provided related to reduce the risk of diseases introduction or spread and how to keep the aquatic animals happy

2. When it comes to the new labelling requirements the following has been done:

The relevant labelling legislation in Viet Nam (Annex 2) has been studied and compared with the new EU legislation on labelling. The total GAP analysis related to the new FIC R 1169/2011 is in Annex 4b. Also meetings with local experts about legislation has been useful in the analysis phase.

The GAP analysis shows the following:

The 3 short Dispatch's documents about fish named (3), (4) and (5) in Annex 2 are small guidelines giving short information to the Fishery sector. They mention short information given in CMO 1379/2013, but are not comprehensive enough and are far from meeting all the articles that are relevant in this document. However we only interpret them as temporary documents that will be reviewed soon.

The VN circular 34/2014 from 27/10 2014 named (2) Annex 2 is the most relevant document when it comes to living up to the new labelling rules for food in Vietnam

It does not cover the specific consumer information rules related to unprocessed and certain processed fishery and aquaculture products mentioned in CMO 1379/2013. It does, to a certain extent, cover the consumer information rules covered by EU FIC R1169/2011, the new EU Regulation covering labelling of all kind of food. However as mentioned in part 2 of this report, the chapter lining up the findings and in the TOC in Annex 4b some essential things for the exporter to the EU to know is missing.

Guideline on the new EU legislation on labeling of fish has been prepared and presented on the seminar for the Fishery Sector on a seminar 4. June 2015. (Annex 3,8,9).

Table prepared where the new things in R1169/2011 are listed and short comments added. Can be used for all kind of food including honey, fruit and vegetables. (Annex 4a).

Conclusion/recommendations related to the new labelling of food:

We were informed during the first weeks meetings that the establishments have received a translated into VN version of the relevant EU documents and this is a good thing. However we believe that a document/guideline covering/explaining the above mentioned information in a more practical way should be useful for the Fishery sector.

A drafted/proposal guideline is added in Annex 3. Additionally it is suggested to arrange practical training on work shop in the future.

When it comes to labeling in other Food Sectors than Fishery, f ex Honey and Vegetables the table prepared in Annex 4a could be used in the further work. In this table comments are given article by article to the new EU “Regulation R116972011 of 25 October 2011 on the provision of food information to consumers”. This Regulation covers all kind of pre-packed food including Honey and Vegetables. General food guidelines in food labeling based on this new EU Regulation would be useful for establishments exporting food products.

3. When it comes to **Traceability** the following has been done:

On the start-up meetings mentioned in the introduction of this report it was stated that some comments about traceability in the report would be useful. However the subject: new labelling of food should have the first priority.

This advice we have as experts followed.

Information from international rules on traceability has been given, the VN legislation (received) on traceability (Annex 7) has been studied and commented.

The comments are the following: When studying the above mentioned received documents, we have not found anything in the VN legislation (received) on traceability that is not according to the EU rules. The question is however how the system function in practice.

We have, during this mission, not had the possibility to check how the system works in practice. In FVO visits from 2009-2012-2014 the traceability concerns were not mentioned. So practical training and audit of the system is recommended.

3. Animal welfare for (farmed) fish and aquaculture

Respecting the five basics freedoms (freedom from discomfort, from hunger and thirst, from fear and distress, from pain, injury and diseases and freedom to express natural behavior) is a fundamental principle underlying measures to protect animal welfare.

Traditionally, the welfare of fish compared to welfare of other ,land farmed animals has not been an important topic to consumers, producers and legislators , an attitude which is reflected in past research projects and legislation directed towards welfare , which hardly ever took fish in consideration

Nevertheless, an increased concern for the welfare of fish in general and especially in aquaculture can be noticed in recent years, stimulated by research results suggesting the awareness of pain and suffering and reports on farming conditions detrimental to health and welfare.

The Treaty of Amsterdam, mentioned above, was the first document that concerns the welfare of fish. Mean while the World Organisation for Animal Health(OIE) and the European Food Safety Authority (EFSA) established work groups to work on the protection of fish welfare. The OIE in the Aquatic Manual provide under chapter 7 guidelines for animal welfare for fish.

5.Fruits and vegetables and Honey export to EU

The consultants produced an extensive document related to the EU requirements of import of fruits and vegetables and it is recommended that a separated in depth workshop should be planed related to solely this topic due to the complexity of EU legislation as directives and regulations.

The consultants proposing a strategy for Vietnam in the Way Forward with a final goal to have a Food Safety Agency.

Chapter 1-Activities

1.Bio security: focus on (Farmed) Fish and Aquaculture

1.a Background :

Biosecurity: Protecting Farmed Fish

What is Biosecurity?

Biosecurity is the process of taking precautions to minimize the risk of introduction and spread of infectious organisms into or between populations.

Why is Biosecurity so important?

Biosecurity is very important to aquaculture because it prevents or limits the introduction and spread of disease within or between aquatic animal production facilities and sites. Since very few effective treatments are available for most aquatic animal diseases, effective biosecurity is the key to preventing these diseases.

How are infectious organisms transmitted?

Disease agents that infect aquatic animals are frequently spread between aquatic organisms in the environment, or equipment used to transfer animals from one holding unit or site to another. Some diseases can also be spread directly through the water by animals releasing the infectious agent or by sick animals dying. Known sources of aquatic animal infections include contaminated feed, equipment, untreated wastewater, fish bearing source waters, and pests such as birds or rodents.

1.b What should be done:

What can I do to reduce the risk of disease introduction or spread?

- Enforce strict sanitary measures for personnel, feed suppliers, veterinarians, harvesters and visitors:
 - Provide disinfected protective clothing
 - Provide hand and footwear disinfection stations at each entrance and exit
- Routinely disinfect equipment and water with recommended disinfectants. Ensure that the disinfectant can be applied safely and poses no toxic risk to humans, aquatic animals or the environment.
- Restrict vehicle, boat and equipment contact with culture and holding units.
- Maintain a log of all visitors coming in contact with your aquatic animals.
- Plan the flow of personnel movement through the facility and require that personnel undertake disinfection procedures between holding units and/or buildings.
- Contain and/or treat effluent and organic waste at origin and prohibit it from re-entering production areas. For open water facilities, dispose of organic waste on land at a site that has measures to prohibit escape of breakdown products into surrounding waters.
- Use pest management protocols to keep out birds, vermin and/or predators.
- Use signage at the facility to inform visitors and personnel that there are biosecurity requirements in place such as controlled access, footbaths, video surveillance, etc.

How do I keep the aquatic animals in my facility healthy?

- Choose your facility/site location carefully with biosecurity in mind; considering, for example: hydrographical characteristics, accessibility for stock in - stock out movements, and health status of surrounding farmed or wild aquatic animals.
- Choose a safe water source for land-based facilities such as well water or spring water. Where such water sources are not available, use a disinfection and/or filtration system(s).
- Stock only with certified disease-free eggs and/or aquatic animals.
- Schedule routine disease monitoring with a veterinarian and implement an aquatic animal health management plan.
- Remove mortalities and moribund animals routinely. When disease is suspected, contact your veterinarian.
- Use caution prior to moving aquatic animals between holding units or farms. Aquatic animals showing signs of disease should not be sold or transferred to other facilities.
- Minimize handling wherever possible to reduce stress that can predispose aquatic animals to infectious diseases.

For the competent authority the OIE guidelines for aquatic diseases should be followed and an assessment via OIE tool PVS related to Aquaculture. By this the system can be upgraded if necessary and proof to overseas inspection agencies secured that Vietnam have a robust system in place.

2. New Labeling for foodstuffs: focus on (Farmed) Fish and Aquaculture

2.1 Background: New labelling rules in the EU became effective 13. December 2014. Regulation 1169/2011, The Food Information to Consumer Regulation (FIC) came into force on 13/12/2011 with a three years transition period and when it comes to fish the EU renewed another Regulation: The Common Organisation of the Markets Regulation (CMO) 1379/2013 getting into force on the same date. The Common Organisation of the Markets Regulation (CMO) introduced in year 2000 required Member States (MS) to provide consumers certain catch information at point of sale. This included: the commercial designation, production method and catch area and applied mainly to fresh fish and shellfish and not processed fishery products. MS were also required to establish a list of the commercial designations accepted in their country together with their scientific name. As part of the recent reform of the EU CMO the consumer information requirements were reviewed and extended under the above mentioned Regulation: 1379/2013.

2.2 What should be done: As mentioned in the introduction The Terms of Reference was discussed with beneficiaries during the first week.(Program, short summary and participation lists in Annex 1).

It was pointed out that the new labelling rules for fish should be presented on a seminar in HCM city on 4 June 2014 where the fish sector would be invited.

Beside this it was a wish from the beneficiaries site that the new tasks in the FIC Regulation 1169/2011 that cover all kind of foods (including honey and vegetables), should be described in the report. Proposals should be given to how this new rules could be implemented in Vietnam.

The labelling legislation in Viet Nam should be compared with the new EU legislation (GAP analysis).

The following legislation is in force in Vietnam for the moment:

- 1) The Government Decree on Labelling of goods 30. August 2006 no. 89/2006/ND-CP.
- 2) Joint circular 34/2014/TTLT-BYT-BNNPTNT-BCT 27. October 2014. Guidance on the Labelling of goods for foods, food additives, and packaged food processing aids.
- 3) Dispatch 1613/QLCL-CL1 Regarding labelling for fishery method as par EC.
- 4) Dispatch 2085/TCTS-KTBVNL- guideline on catching method labelling as required by EC dated 11/8/2014.
- 5) Dispatch 3027/TCTS-KTBVNL- guideline for catch statement in the Catch certificate, dated 12/11/2013.

The above mentioned Viet Nam legislation have been read and compared with the following EU legislation:

EU Regulation 1169/2011, The Food Information to Consumer Regulation (FIC) and when it comes to fish: The Common Organisation of the Markets Regulation (CMO) 1379/2013.

Also meetings with local expert about legislation has been useful in the analysis phase.

Guideline on the new labelling of fish has been prepared and presented on the seminar for the Fishery Sector on a seminar 4. June 2015. (Annex 3,8,9).

Table of correspondence of R1169 towards VN Joint circular 34/2014/TTLT-BYT-BNNPTNT-BCT 27. October 2014 has been prepared. GAP analysis. (Annex 4b).

Table prepared where the new taks in R1169/2011 are listed and short comments added. Can be used for all kind of food including honey, fruit and vegetables. (Annex 4a).

3. Animal welfare: focus on (Farmed) Fish and Aquaculture

3.a Background

General introduction to the Policy background of Aquaculture Welfare projects.

Societal and political background.

The commission has been developing animal welfare legislation for over 30 years ,and has been at the forefront of initiatives to promote this internationally by its active participation in and support for, initiatives of the council of Europe and the World Organisation for Animal health (OIE).

The European Commission's activities in this area start with the recognition that animals are sentient beings. The general aim is to ensure that animals do not endure avoidable pain or suffering ,and obliges the owner/keeper of animals to respect minimum welfare requirements.

Looking back, the first Community legislation on farm animal welfare was adopted in 1974 and concerned the stunning of animals before slaughter.

Respecting the five basics freedoms (freedom from discomfort, from hunger and thirst, from fear and distress, from pain, injury and diseases and freedom to express natural behavior) is a fundamental principle underlying measures to protect animal welfare.

In this context, the Community Action Plan on the Protection and Welfare of Animals, adopted by the European Commission on 23 January 2006, embodies the Commission commitment to EU citizens, stakeholders, the European Parliament and the council for a clear map of the commission planned animals welfare initiatives in coming years .

It also responds to the principles set out by the Protocol on Protection and Welfare of animals annexed to the EC Treaty by the Amsterdam Treaty. This protocol recognizes that animals are sentient beings and obliges the European Institutions to pay full regard to the welfare requirements of animals when formulating and implementing Community legislation

Welfare of fish.

Traditionally, the welfare of fish compared to welfare of other ,land farmed animals has not been an important topic to consumers, producers and legislators , an attitude which is reflected in past research projects and legislation directed towards welfare , which hardly ever took fish in consideration

So why were-and still are-fish, compared to other animals , not a hot topic regarding animal welfare concerns ?

Firstly, there is a lack of tradition in perceiving fish as sentient beings , as fish do not evoke compassion and concerns in humans in the same way other, warm-blooded animals do;

Secondly, there is still no concensus among scientist whether fish are able to perceive pain and suffer;

Thirdly, large scale, industrialized aquaculture is a relatively recent farming method.

Nevertheless, an increased concern for the welfare of fish in general and especially in aquaculture can be noticed in recent years, stimulated by research results suggesting the awareness of pain and suffering and reports on farming conditions detrimental to health and welfare.

The Treaty of Amsterdam, mentioned above, was the first document that concerns the welfare of fish. Mean while the World Organisation for Animal Health(OIE) and the European Food Safety Authority (EFSA) established work groups to work on the protection of fish welfare.

The new Constitution which was adopted in June 2004, contains a reworded article on the protection and welfare of animals . The word “fisheries” was added, the text being ”in formulation and implementing the Unions’ Agriculture, fisheries, transport, internal market, research and technological development and space policies, the union and the Member States shall pay full regard to the welfare requirements of animals, as sentient beings.

Documents

1. **Communication from the Commission to the Council and the European Parliament. A strategy for the sustainable development of European Aquaculture.** Brussels 19.9.2002-COM(2002)511 final .
2. The Council of Europe adopted the proposal of the “**Recommendations for farmed Fish**” made by the Standing Committee of the European Convention on the Protection of Animals kept for Farming Purposes (5 December **2005**) which entered into force on 5th June **2006**

3. “**Animal Welfare in Europe: achievements and future prospects**”. The Council of Europe (CoE), the European Union (EU) and the World Organisation for Animal Health (OIE) adopted in June **2006** a joint declaration on animal welfare in Europe. It commits the Council of Europe, the OIE and the European Union to provide mutual support and cooperation on all aspects of animal welfare, from the elaboration of legislation, to the training of veterinary professionals and para professionals, to raising public awareness of the social value of animal welfare.

The important link between animal welfare and the need for adequate scientific and veterinary expertise is stressed in the document. Furthermore, the Declaration commits to efficiently assist countries to comply with, develop or enforce animal welfare laws, standards and guidelines at a national level.

4. **International organisations** have also issued recommendations and guidelines concerning fish welfare. A number of codes of practice have also been adopted by industry that includes measures to safeguard fish welfare.
5. **EFSA role** and activities in the area of fish welfare are carried out in the wider context of animal health and welfare by the Panel on animal health and welfare (**AHAW**). The panel provides independent scientific advice to risk managers on all aspects of animal diseases and animal welfare. It work chiefly concerns food-producing animals including fish.

Through its activities on fish welfare, EFSA aims to gain an in-depth understanding of the factors affecting the welfare of farmed fish and to provide a science-based foundation for European policies and legislation. Its scientific opinions focus on helping risk managers identify methods to reduce unnecessary pain, distress and suffering for animals and to increase welfare where possible.

EFSA is **not** mandated to give advice on ethical or cultural issues related to animal welfare.

6. In **2008** the World Organisation for Animal Health (**OIE**) adopted guiding principles for fish welfare.

The following guidance as a base line for farmed fish production on a global basis are:

- Introduction to recommendations for the welfare of farmed fish
- The welfare of farmed fish during transport
- The welfare aspects of stunning and killing of farmed fish for human consumption
- The killing of farmed fish for disease control purpose.

These codes recommend that:”the use of fish carries with it an ethical responsibility to ensure the welfare of such animals to the greatest extent practicable” and that “as a general principle, farmed fish should be stunned before killing, and the stunning method should ensure immediate and irreversible loss of consciousness. If the stunning is not irreversible, fish should be killed before consciousness is recovered.”

Welfare during transport

Fish welfare can be affected during transport. In an opinion in **2004** on the welfare of several species of animals during transport, EFSA experts identified a variety of hazards that contribute to poor welfare for several animals, including fish. The opinion highlighted that fish should normally be loaded and unloaded avoiding exposure to air, they should be provided with appropriate levels of oxygen in the water and maintained at a suitable stocking density.

Husbandry systems

In **2008** EFSA was asked by the European Commission to assess welfare aspects of husbandry systems for the main farmed fish species in the EU. The AHAW Panel has adopted **five species-specific opinions** on farmed Atlantic salmon, trout species, European eel, European seabass and gilthead seabream, and Common carp.

For each species and different life stage, potential risks for welfare were identified. These include environmental conditions, feeding, husbandry practices, genetic make-up of stocks, disease and disease control measures.

In its risk assessment, the Panel produces a ranking system for potential welfare hazards in the various farming system

Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing point 11 mentioning: Fish present substantial physiological differences from terrestrial animals and farmed fish are slaughtered and killed in a very different context, in particular as regard the inspection process. Furthermore, research on the stunning of fish is far less developed than for other farmed species. Separate standards should be established on the protection of fish at killing. Therefore, provisions applicable to fish should, at present, be limited to the key principle. Further initiatives by the Community should be based on a scientific risk assessment for the slaughter and killing of fish performed by EFSA and taking in account the social, economic and administrative implications.

Article 3(1) of the general requirements for killing and related operations indicate: Animals shall be spared any avoidable pain, distress or suffering during their killing and related operations.

General approach to fish welfare

In **2009** the AHAW Panel adopted an opinion on the general approach to fish welfare. This provides an overall approach regarding the welfare, biology and physiology of fish. It addresses and satisfies all the issues outlined in the minority opinions recorded in relation to AHAW Panel opinions previously adopted on the welfare of individual fish species.

Stunning and killing methods

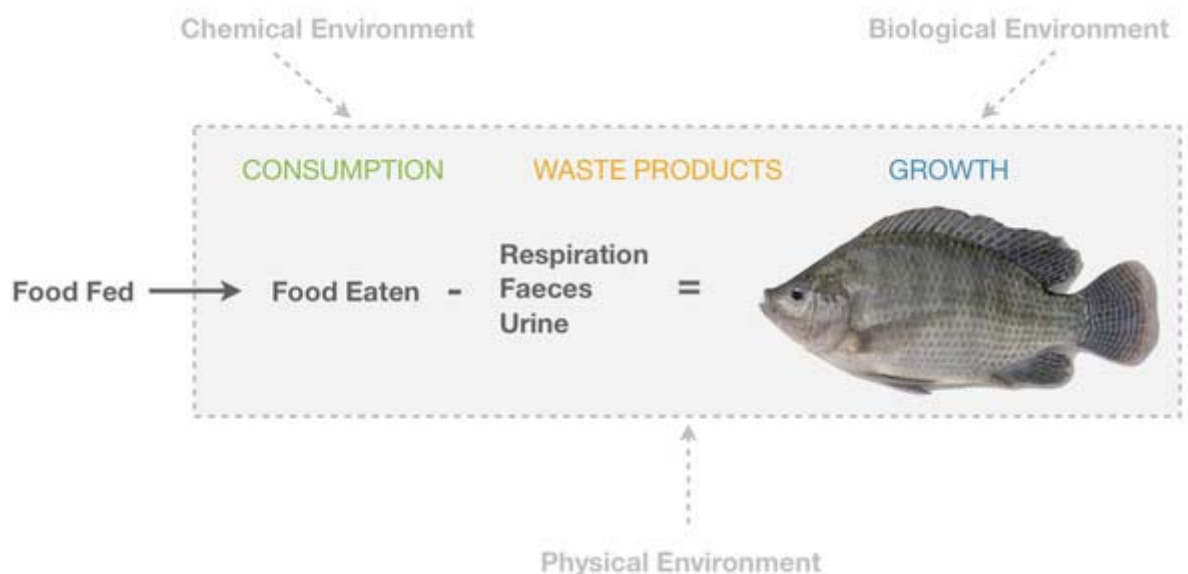
In **2009** the AHAW Panel adopted **7 species-specific opinions** on the welfare aspects of stunning and killing methods for farmed fish. The individual scientific opinions concern bluefin tuna, common carp, European eel, atlantic salmon, rainbow trout, European turbot, European seabass and gilthead seabream.

This work **updates** the previous opinion on the welfare aspects of stunning and killing for the main animal species subject to commercial and farm slaughtering practices adopted on 2004, where general conclusions and recommendations were provided

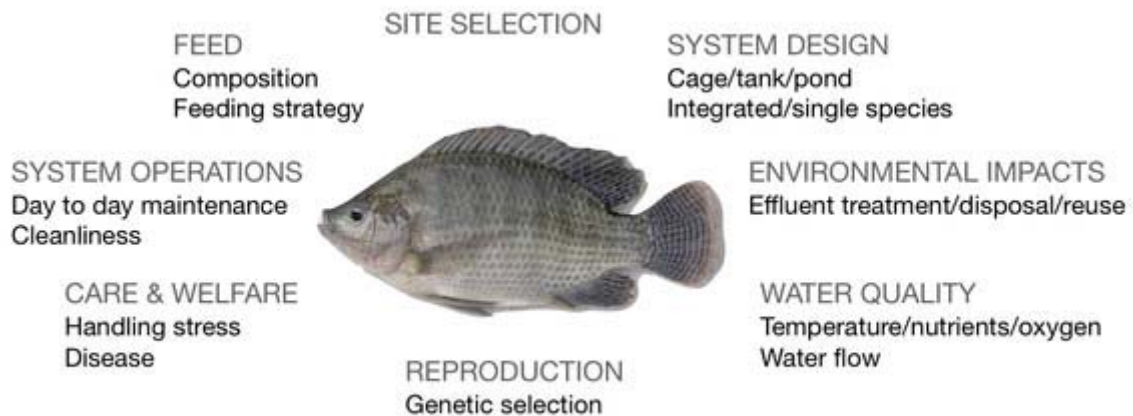
The practice of farming aquatic organisms such as fish, shellfish and aquatic plants is known as **aquaculture**. In recent years, the decline of wild fish stocks, combined with an ever increasing population has highlighted the shortfalls of capture fisheries and has resulted in massive growth of the aquaculture industry at 11% per year. In 2008, the global human consumption of fish and shellfish was 52.5 million tonnes, worth US\$98.4 billion. Such is the demand for healthy sources of protein (in particular omega 3 fatty acids) that it is now estimated aquaculture accounts for half of that fish and shellfish consumed by humans globally. In some countries such as China, this figure is much higher- with over 80% of fish for human consumption coming from farmed sources.

The concept of aquaculture is simple; to produce your chosen species with minimum input and in minimum time.

To do this one must understand the influences that affect the growth of the organism:



All of these influences can be managed in some way and it the effective management of these which leads to successful aquaculture:



HISTORY OF AQUACULTURE

Aquaculture is by no means a recent concept. Across the globe, pockets of aquatic production have been going on for literally thousands of years. Indigenous people from Australia may have grown eels in large volcanic floodplains as early as 6000BC as the main part of their diet. It has been well documented that in Far Eastern countries, growing various eels and carps in paddy fields along with rice began around 2500BC. Europe also has a long history of aquaculture, with the Romans and early Christian monasteries growing fish in ponds thousands of years ago.

During the industrial revolution, improvements in transport meant fresh fish could be supplied from the coast to inland areas relatively inexpensively, making aquaculture less popular. However, that same industrial revolution has now led to **overfishing** of wild stocks and a global population boom- which demands more fish. Over the last 50 years, this has made aquaculture a truly global industry, growing faster than any other food sector.

Growth of the aquaculture industry in such a short time has inevitably led to questions of sustainability. There is widespread acceptance that aquaculture will be relied on more as the global population continues to grow, therefore to provide in the future it must, and is, moving towards sustainability.

Examples of sustainable practices include:

- **Culturing** **‘Vegetarian’** **fish**
Fish lower in the food chain (carp, tilapia and catfish) can be fed a vegetable based diet in contrast to higher level species (salmon, tuna, cod) which must be fed a diet high in fish protein.
- **Improvements** **in** **feeding** **efficiency**
Improving the composition of feeds (by reducing the amount of fish meal), selective breeding of fish more efficient in converting food into flesh, and improvements in feeding techniques to reduce waste.
- **Closing** **the** **lifecycle** **of** **species** **in** **captivity**
So there is no need to gather new stock from the wild
- **Supporting** **local** **communities**
Protecting natural ecosystems and improving the social and economic prospects of local people

- **Reducing or eliminating waste output**
Integrated farming systems such as aquaponics, moving away from only farming one species at a site to an ecosystem based approach to production. Waste products from one species can be used to produce another. In this way various species from different levels in the food chain can be grown together. This can result in zero waste emissions, many different crops at harvest and crops that are harvestable at different times.

FISH WELFARE

The Five Freedoms have been widely used in marketing and have been the foundation of much legislation concerned with animal welfare both in and outside the UK.

- **Freedom from Hunger and Thirst – by ready access to fresh water and a diet to maintain full health and vigour.** Specially formulated diets are continually being improved or developed for each species being cultured. This tailor makes the diet to the nutritional needs of each animal.
- **Freedom from Discomfort – by providing an appropriate environment including shelter and a comfortable resting area.** This is particularly important in aquatic species as there are so many water quality parameters to be adhered to and these are different depending on the species being cultured. During transportation of live fish are particularly susceptible to stress and must be kept in secure dark containers kept at constant lower temperatures, with lots of aeration/oxygenation and a method for carbon dioxide gas removal.
- **Freedom from Pain, Injury or Disease – by prevention or rapid diagnosis and treatment. Disease spreads much faster in the aquatic environment.** It is more difficult to spot problems that individuals may have in the aquatic environment. If many fish are kept together in one tank, it is harder to spot skin lesions that may be present in some of the population and therefore treat the fish before it spreads to the rest of the tank. Treating health problems often involves treating the whole tank/water instead of the individual. During harvest on commercial salmon farms, fish are stunned with electrocution before the gills are cut, ensuring the animal is not in ‘pain’ or stressed.
- **Freedom to Express Normal Behaviour - by providing sufficient space, proper facilities and company of the animal’s own kind.** Generally, fish like sticking together. Optimal stocking densities are designed to ensure the animal has enough space/water but also is not stressed at being in low densities. Larger fish are kept in larger tanks and fish which only like to live or breed on certain substrate (gravel, sand, weed, etc) are provided with the appropriate substrate.
- **Freedom from Fear and Distress – by ensuring conditions and treatment which avoid mental suffering.** Dark tanks with smooth edges are used particularly during egg and larval production to reduce stress. Grading of the fish ensures cannibalistic species (such as barramundi will not eat and injure each other.

4. Traceability: focus on (farmed) Fish and Aquaculture

4.a. Background

Tracing **farmed fish and seafood products** as they travel through the supply chain is a means to demonstrate to consumers, retailers, and export markets that the products they

are purchasing come from **aquaculture** operations which operate in a safe and sustainable way. All aquaculture certification systems include a traceability element to ensure that the integrity of certified products is maintained from “farm to fork.”

Traceability systems can identify where a product is at any given time, where it has been prior to its current location, and what was done to it along the way. A sophisticated traceability system can track finfish from egg to juvenile to adult fish (and feed), through to the marketplace, and shellfish from larvae to seed to final sale. This maintains confidence in farmed seafood systems.

Traceability is a way to monitor, maintain, demonstrate, and verify safety, nutrition and other aquaculture product attributes. Traceability systems can identify where a product is at any given time, where it has been prior to its current location, and what was done to it along the way.

Traceability serves a third purpose for businesses along the **aquaculture supply chain** which want to track their products for internal accounting and other business reasons:

- **Feed manufacturers** can trace all feed ingredients and where feed is delivered.
- **Breeders** can trace all fish in breeding stocks and where eggs are delivered.
- **Nursery operators** can track sources of hatchery seed and where shellfish is delivered.
- **Hatchery operators** can trace the source of eggs and genetic identify of fish, records of feed, medication and other inputs, and where fish is delivered.
- **Farm operators** can trace the source of fish by hatchery, records of feed, medication and other inputs, and where fish is sent for processing.
- **Transporters of live fish** can trace the source, destination. and delivery for each unit of fish.
- **Fish processors** can trace the sources of all fish received, the tracing of all fish sent for delivery by batch and lot numbers, product labeling, and purchase order number

Food Law:

Regulation 178/2002 contains general traceability requirements and is in place to protect both consumers and traders and require that foods are traceable through all stages of production, processing, and distribution. This means that food businesses are required to keep records of businesses who have supplied them with food, and businesses which they supply food to. Every item of food must have an identifiable supplier and customer, and this information must be made available to enforcement officers if required.

A recent amendment requires additional information on the quantity of food, a reference **identifying the lot or batch**, description of food and date of dispatch. This applied from July 2012.

Regulation 854/2004 Hygiene for Products of Animal Origin - food businesses that require approval must apply a health mark to product. This includes an approval number and country the business is located in. There are also record keeping requirements.

Regulation 16/2012 Until food is subject to further processing or consumer , food business must provide food business to which product is supplied with date of production

and if different the date of freezing. CMO R 1379/2013 and FIC R1169/2011 are relevant when it comes to information to the consumer.

The EU is by far the world's biggest importer of fish, seafood and aquaculture products. Import rules for these products are harmonized, meaning that the same rules apply to all EU Member States are only authorized from approved establishments (e.g. processing plants, cold stores) that have been inspected by the Competent Authority of the exporting country and found to meet EU requirements.

Since 2004, EU government regulators, importers, processing plants and retailers have substantially increased aquaculture product **testing** for residues of veterinary medicines and other contaminants. This has led to increased detections of trace levels of antibiotic residues, particularly nitrofurans and chloramphenicol in farmed shrimp consignments imported from various countries.

Products of animal origin are subject to more stringent rules for EU imports than products of non-animal origin, as set out in Directive 2002/99/EC.

Products of animal origin can only be imported to the EU from a third country approved and listed by the European Commission (EC). Inspectors from the **Food and Veterinary Office (FVO)** evaluate the country of origin as to whether it complies with EU food safety and quality requirements and the veterinary and plant health legislation.

Requirements are governed by regulations and directives and implemented into the national law of each member state, covering not just traceability but also quality, packaging and health aspects:

1. The exporting country must be approved for export of animal products to the EU;
2. Products must originate from an approved establishment registered by a competent authority in the country of origin, approved by the European Commission;
3. All shipments must be accompanied by a health certificate issued by the responsible authority in the country of production. The health certificate states country and establishment of origin;
4. All imports must pass a health control at the border inspection post. Both documents and the physical product fall subject to inspection, depending on the risk profile of the product and results of previous checks. All shipments of foodstuff to the EU must be notified 24 hours before reaching the border inspection post.

In 2004, the EU adopted the three basic Acts forming the core of the so-called "**Food Hygiene Package**", which lays down hygiene rules for foodstuffs produced in the EU and non-EU countries exporting to the EU. In order to comply with these, the traceability of products is critical.

The WTO Sanitary and Phytosanitary (SPS) Agreement recognizes measures a government can execute in order to protect domestic animal and plant health and food safety. Introducing an SPS policy may be legitimate when it is considered necessary to protect human, animal and plant life and health.

Member countries of the WTO are allowed to set their own standards, provided that the regulations are scientifically justifiable. The measure is considered inappropriate (or illegal) if it discriminates between countries with similar conditions and standards.

Complying with SPS standards is not compulsory for producers of animal products who only trade within their home country; instead they must comply with national legislation. It is however a necessary prerequisite to fulfil EU SPS regulation in order to access the European market. The rules regarding residues of pesticides and veterinary drugs comply with those established by the Codex Alimentarius Commission.

Traceability in fish: is done using batches, linked back to the pond or cage used (aquaculture) or the catch time and date (wild catch).

Multiple mandatory traceability systems already operate in the fisheries and aquaculture sector (Codex document CAC/GL 60-2006, catch certification, country of origin, and mechanisms for combating illegal, unregulated and uncontrolled [IUU] fishing).

The EU introduced a regulation to prevent, deter and eliminate the import of **Illegal, Unreported and Unregulated (IUU) fishery products into the Community** which came into force in 2010. Regulations (EC) No. 1005/2008 and 1010/2009 create new requirements on fish and fisheries products entering the EU market from third countries (non-EU). All importers need now to take steps to ensure the goods they import have been legally caught. As a minimum, the importer needs to ascertain that his export partner is able to provide the validated catch certificate for every consignment.

In addition, **Regulation (EC) No. 1224/2009** includes requirements about labeling of **fish products**, pointing out each batch identification number, each **vessels** external marketing or name of production site, FAO-code for each species and date of catchment or production, as the minimum mandatory information to accomplish **traceability of fish products**.

Additionally, a European black list has been drawn up covering both IUU vessels and states that turn a blind eye to illegal fishing activities. EU operators who fish illegally anywhere in the world, under any flag, face substantial penalties proportionate to the economic value of their catch, which deprive them of any profit.

Voluntary Schemes

The impact of private standards is not uniform across markets, species or product types.

Nevertheless it is increasing.. Traceability aspects of private standards certification schemes are trying to meet the multiple requirements relating to food safety, catch certification, illegal, unreported and unregulated (IUU) fishing and chain-of-custody aspects, as well as public regulatory requirements. The main ones promote their added value as Ecolabels and food safety and quality standards.

Private safety and/or quality standards are typically based on mandatory regulation. Commercial designation, scientific name, catch area, production method and whether the product has previously been frozen must also be made available to the consumer. The following Regulations: COM R1379/2013 and FIC R1169/2011 and labelling is mentioned in details in this report under the section labeling.

Fish marketing

Regulations 2065/2001, R1379/2013 and FIC R 1169/2011 provide for consumer information requirements. They require the commercial designation, scientific name, catch area and production method to be available throughout the supply chain for CN03 (unprocessed) products.

4.b What should be done

Viet Nam has two regulations on Traceability have been received:

- 1 Circular no. 74/2011/TT-BNNPTNT on Traceability, Recall and Handling of unsafe ...food October 31, 2011
2. Circular no. 03/2011/TT-BNNPTNT on Tracing and Recall of Fishery Products failing to meet food quality and safety requirements, January 21, 2011. (Annex 7 number 1 and 2).

Also the following law has been received:

Law on product and goods quality no. 05/2007/QH12 (Annex 7 number 7) is interesting when it comes to traceability.

On the start-up meetings mentioned in the introduction of this report it was stated that some comments about traceability in the report would be useful. However the subject: new labelling of food should have the first priority.

This advice we have as experts followed.

5. Miscellaneous

5.1 Export of Honey to the EU-requirements

5.1.a. Background

Honey

In practical terms, traceability of honey is needed in order to demonstrate compliance with origin, quality and packaging requirements.

Quality requirements

All honey intended to be sold in the EU market needs to fulfill the requirements concerning the definition of honey, classifications of honey, labeling and composition criteria that are stipulated in Council Directive 2001/110/EC.

For honey imported into the EU, the following information, in the language of the importing country, must be included on the label:

- The name under which it is sold;
- The gross and net weight;

- The date of minimum durability – “best before”;
- Any special conditions for keeping or use;
- The name and address of the manufacturer, packager or importer established in the EU;
- Place of origin or provenance;
- Lot marking on pre-packaged foodstuffs with the marking preceded by the letter “L”;
- Drum number (if exported in bulk).

For a product to be labeled ‘honey’ when exporting to the EU, there are certain limits stipulated in Directive 2001/110/EC:

- No ingredient of honey is to be removed, unless it is unavoidable during the removal of foreign materials;
- Filtered honey, baker’s honey, comb honey and other types of honey that has been altered or which is of inferior quality can therefore not be labeled simply as “honey”;
- Council Directive **2001/110/EC** states that all honey which is blended and traded in the EU must be labeled either “blend of EC honey”, “blend of EC and non-EC honey” or “blend of non-EC honey”;
- Composition criteria includes sugar content, moisture content, water-insoluble content, electrical conductivity, free acid content, diastase (enzyme) activity and hydroxymethylfurfural (HMF) content.

Honey is often exported from ACP countries to the EU in bulk, then blending and packaging takes place in the recipient country. In most cases, this causes the honey’s loss of specific origin, making branding and differentiation difficult. Use of glass jar packaging, which gives added traceability and value to the product, is less common due to the required up-front investment and stricter requirements. Bulk honey is shipped to the EU in 205 or 210 litre steel drums, which must be of good quality and coated with food safe paint, clean and moisture proof.

Voluntary Schemes

Several voluntary participation schemes, such as organic certification (regulated by EC regulation), Fair Trade certification (regulated by the Fair Trade Labeling Organization, FLO), ISO certification, HACCP and various certification initiatives taken by the food industry in the EU are available to producers – they all entail traceability of the honey and its production process details as a basic requirement.

The Identification of the units traded

Honey shall be traded as uniquely identified and labeled units. Businesses that create trade units should identify and label each of them. Businesses that create logistic units, made up of numbers of separately identified trade units, should identify and label each logistic unit. Businesses that physically trade in honey must generate and hold the

required information, appropriate to the type of business, for each of the units traded. Businesses in the honey industry include:

1. Drum producers;
2. Bee keepers;
3. Plastic squeezers;
4. Plastic squeezer caps;
5. Glass jars;
6. Glass jars lids;
7. Honey processors;
8. Transporters and storage holders;
9. Wholesalers/retailers/supermarket

5.1.b. What should be done

The FVO visit in September 2012 clearly indicated that that Vietnam has an equivalence system in place and have put on the EU list to have the possibility to export Honey to EU. It was mentioned in MARD that awareness was needed to bee keepers and associations to prevent the use of antibiotics and selling their products. For that reason the team propose to schedule in second phase a workshops for those bees keepers after an assessment and visits to those areas were bees are kept to have the possibility to listen to local beekeepers and perhaps their constrains.

5.2 Export of fruit and vegetables to the EU-requirements

5.2.a. Background

In the Annex a document is produced to understand the requirements for export of fruits and vegetables to the EU. In the document frame work for standard setting and conformity assessment are mentioned; harmonization of EU regulatory requirements under WTO Agreement and minimal requirement for global trade. In the Annex of this report is a supplier guide written for understanding of the EU requirements for import of fruits and vegetables in EU.

5.2.b. What should be done

A committee should be addressing this requirements and a workshop specifically for this topic should be organized with also the industry. An assessment could be done by visits of those possible exporters if the requirements could be full filled including the Codex for fruit and vegetables.

Chapter 2: Findings.

1. **Biosecurity: focus on (farmed) Fish and Aquaculture**

Import risk analysis done in NZ gives a good indication how to proceed.

An **Import risk analysis**: Frozen, skinless and boneless fillet meat of *Pangasiusspp.* fish from Vietnam for human consumption by Biosecurity New Zealand Ministry of Agriculture and Forestry- Wellington in 2008:

General sanitary measures were considered necessary:

a) to ensure that the likelihood of clinically or sub clinically diseased fish being harvested for processing is minimized:

- both the farm of origin and the processing facility must be registered with the competent authority of the country in question; and
- fish processed must be derived from brood stock resident in the exporting country; and
- fish showing clinical signs of disease, septicaemia or skin ulceration must not be harvested for processing into this commodity; and
- fish harvested must not be subject to emergency slaughter for disease reasons, regardless of whether or not they display clinical signs themselves.

-to avoid contamination of the commodity with exotic food borne pathogens:

only potable water should be used during the processing of the fish into fillet meat

-to ensure compliance with freezing and transport regime included in the commodity definition:

- to ensure that the inactivation of pathogenic and parasitic organisms, caused by the freezing process, does occur it must be determined that the commodity was frozen and held at -18°C , or lower, for at least 7 days (168 hours) before a biosecurity clearance is issued.

An initial list of organisms of potential concern was developed from published literature, scientific texts, the OIE (World Organization for Animal Health) list of notifiable fish diseases and official disease reporting statistics. This list was critically examined using a number of criteria including the status of the organism in New Zealand and the exporting region, the presence of more virulent strains in the region of origin, restricted geographical range of organisms in New Zealand if applicable, different host associations in different area and the official control status in New Zealand.

Eight potential hazards were identified from the list of organisms of potential concern and subjected to further risk assessment. These were iridoviruses, atypical *A. salmonicida*, *Flavobacterium spp.*, *Edwardsiella ictaluri*, *Kabatana arthuri*, digenean metacercaria, larval nematodes, and *Aphanomyces invadans*.

Waterborne contaminants were also considered as a **ninth hazard**.

None of the eight primary potential hazards were identified as requiring specific risk management measures. The separation of the fillets from the rest of the carcass effectively removes the majority of organisms that might be present in the live animal.

Titres of pathogenic organisms in muscle are usually many times lower than those found in the viscera.

Quantities of waste in New Zealand are likely to be small and it was apparent that the likelihood of product entering the aquatic environment in sufficient quantities to represent an infectious dose is so low as to be negligible. In addition, the period of time frozen effectively reduces any parasitic burdens to levels where the likelihood of entry to New Zealand is negligible. To mitigate any residual risk to human health, water quality standards were specified to prevent entry of food borne hazards.

The Australian Centre for International Agricultural Research (ACIAR) through Project FIS 2005/114: "*Building bivalve hatchery production capacity in Vietnam and Australia*" has established hatchery-based bivalve mollusc seed production at Cat Ba Island. This has facilitated the development of small scale mollusc culture businesses in Vietnam through the selection of suitable bivalve species and provision of nursery facilities. Central to continued industry operation and expansion is optimising molluscan health - this is based on having in place appropriate biosecurity and disease diagnostic capacity. While there has been advances made in bivalve hatchery production in Vietnam, the capacity to diagnose disease and to implement biosecurity measures has until now not been clearly assessed.

This project set out to evaluate current diagnostic capacity for bivalve molluscs at the Research Institute of Aquaculture (RIA) No.1, and identify additional diagnostic requirements necessary to develop or implement practical disease diagnosis to support regional biosecurity. ; and to evaluate current biosecurity for bivalve molluscs, considering the effectiveness of current measures being taken and provide recommendations for functional and operational improvements in hatchery management and design to control or prevent of mollusc diseases. A series of recommendations for future improvement are provided.

In **September 2014** the FVO visited Vietnam to evaluate the control systems in place governing the production of Bivalve Mollusc and fishery products derived therefore intended for export to European union. In the overall conclusion it was written on page 20 onwards that despite the CA has a official control system in place to control the production of LBM and fishery products derived there from that significant deficiencies were identified and short coming for official certification.

2. New Labeling for foodstuffs.

2.1 Findings in the new EU legislation concerning labeling.

2.1.1 COM Regulation 1379/2013:

The Common Organisation of the Markets Regulation (CMO) introduced in 2000 required Member States to provide consumers with certain catch information at point of sale. This included the commercial designation, production method and catch area and applied mainly to fresh and not processed products. Member States were also required to establish a list of the commercial designations accepted in their country together with their scientific name.

As part of the recent reform of the EU Common Fisheries Policy the consumer information requirements were reviewed and extended under a new Common

Organisation of the Markets Regulation (EU) No 1379/2013. This document explains what information is required for fish and shellfish. It applies from 13 December 2014.

Key changes introduced by this regulation include:

- Information is provided both to the final consumer and to mass caterer, which is new.
- For sale to the final consumer the commercial name and scientific name must be given, before the scientific name was voluntary. The scientific name should be in accordance with the FishBase Information System or the database of the FAO, The scientific name should be in accordance with the FishBase Information System or the ASFIS database of the FAO at www.fao.org/fishery/collection/asfis/en
- The production method, i.e. saltwater fishing, freshwater fishing or farming, must be disclosed in connection with the trade name with one of the following: "... caught ...", "... caught in freshwater ... ' and "... farmed ...". Before the wording was "cultivated" instead of "farmed".
- The gear category must be reported (only a demand for wild fish). Wild fish must display one of the following fishing gear categories used to catch the fish: 'seines', 'trawls', 'gillnets and similar nets', 'surrounding nets and lift nets', 'hooks and lines', 'dredges', and 'pots and traps'.
- Also the information of the area where the product was caught or farmed is getting more detailed.

2.1.2 The Food Information to Consumer Regulation (FIC) 1169/2011:

This new regulation brings EU rules on general and nutrition labelling together into a single regulation to simplify and consolidate existing labelling legislation.

The purpose of labelling is to ensure that consumers receive the necessary information about each food and to create the basis for effective control. In addition, the rules ensure the consumer from misleading labelling and marketing.

Key changes introduced by this regulation include:

- Country of origin/Place of provenance: origin requirements have been tightened and also extended to fresh and frozen meat from pigs, sheep, goats and poultry. Seafood is excluded because an origin is required under the Fish Labelling Regulations.
- Nutrition labelling: 'back of pack' information will become mandatory on the majority of pre-packed foods, single ingredient unprocessed foods are exempt eg fish fillets.
- Date marking: depending on the type of food, consumers will continue to see 'best before' and 'use by' dates on pre-packed foods. Where appropriate i.e. for meat and fish, there will also be a date of first freezing shown on food labels.

- A minimum font size is introduced for the mandatory information on most food labels.
- The types of vegetable oil used in food, such as palm oil, must be stated.
- Allergen information will be extended to non-pre-packed foods and catering situations with flexibility in how businesses provide this to consumers.
- Added water in fishery products which have the appearance of being made from a whole fillet will need to be shown in the name of the food if it makes up more than 5% of the final product.
- More detail is given on mandatory information that must accompany the name of the food. This includes the use of the words 'formed fish' where a product gives the impression of having been made from a whole piece of fish when it is in fact made from pieces.

2.2 Findings in the comparison between the Vietnamese legislation concerning labelling and the new EU legislation (GAP analysis).

The following legislation is in force in Vietnam for the moment:

- 1 The Government Decree on Labelling of goods 30. August 2006 no. 89/2006/ND-CP.
- 2 Joint circular no 34/2014/TTLT-BYT-BNNPTNT-BCT guidance on the labelling of goods for foods, food additives, and packaged food processing aids.
- 3 Dispatch 1613/QLCL-CL1 Regarding labelling for fishery method as par EC.
- 4 Dispatch 2085/TCTS-KTBVNL- guideline on catching method labelling as required by EC dated 11/8/2014.
- 5 Dispatch 3027/TCTS-KTBVNL- guideline for catch statement in the Catch certificate, dated 12/11/2013.

2.2.1 The Government Decree on Labelling of goods 30. August 2006 no. 89/2006/ND-CP named as (1):

This Decree covers all kind of goods from food to wood furniture and musical instruments. It is not covering the same as CMO 1379/2013 and R1169/2011.

The responsibilities are described in art 12: The Ministry of Science and Technology shall assume the prime responsibility for, and coordinate with specialized management ministries in, amending and supplementing compulsory contents of goods labels and further in art 21: Responsibilities of the Ministry of Science and Technology

The Ministry of Science and Technology shall take responsibility to the Government for performing the unified state management of goods labeling nationwide with the following specific tasks:

1. Drafting and submitting to competent state agencies for promulgation or promulgating according to its competence legal documents on goods labeling;
2. Disseminating and propagating policies and laws, organizing professional guidance and training in goods labeling.
3. Supervising and inspecting the observance of legal documents on goods labeling. Assuming the prime responsibility for settling and handling violations of goods labeling.
4. Stipulating the announcement of goods labels.

5. Organizing the building and management of a database on goods labels.

The General Department of Standardization, Metrology and Quality Control under the Ministry of Science and Technology shall assist the Minister of Science and Technology in performing the state management of goods labeling.

In art 12 it tells what should be shown on the label:

Contents which must be shown on labels depending on the characteristics of goods:

1. Food:

a/ Quantity;

b/ Date of manufacture;

c/ Expiry date.

2. Foodstuffs:

a/ Quantity;

b/ Date of manufacture;

c/ Expiry date;

d/ Ingredients or ingredient quantities;

e/ Hygiene and safety information, warnings.

f/ Instructions on use and preservation.

3. Drinks (excluding alcohol):

a/ Quantity;

b/ Date of manufacture;

c/ Expiry date;.....

2.2.2 Dispatch 1613/QLCL-CL1 Regarding labelling for fishery method as par EC named as (3)

Very short: tells” Fishery producers for exporting to the EU should:

- Include catching method in the label for exported goods to the EU as per the Annex of Dispatch 2085/TCTS-KTBVNL dated 11/8/2014, specifically: include the method detail based on the Catch certificate (regulated by Annex 3 of Circular 28/2011/TT-BNNPTNT).
- Contact with importer to update and comply with EU’s labeling requirements
- Local Agriculture, Forestry and Fishery Quality Control Centers should update and disseminate EC’s Regulation No. 1379/2013 and guidelines of Directorate of Fishery to producers and exporters.

2.2.3 Dispatch 2085/TCTS-KTBVNL- guideline on catching method labelling as required by EC dated 11/8/2014 named as (4).

It tells the following (as received translated):

“Dispatch 2085/TCTS-KTBVNL – guideline on catching method labeling as required by EC dated 11/8/2014

The Dispatch requests Vietnam Association of Seafood Exporters and Producers (VASEP) to update its member firms on new labeling requirements, using new codes in the annex.

Annex

Abbreviations of catching methods to be included in the goods label”.

2.2.4 Dispatch 3027/TCTS-KTBVNL- guideline for catch statement in the Catch certificate, dated 12/11/2013 named as (5).

It tells the following (as received translated):

“Guideline for catch statement in the Catch certificate, dated 12/11/2013.

As requested by EII, member states only allow to import tuna products with safety certificate for dolphins, and not allowing tuna caught by gillnet method of VN, which is deemed unsafe for dolphins. After a meeting in 2013 in HCMC, EII agreed to let VN’s tuna manufacturers and exporters to use the Catch certificate to prove that the tuna is not caught by gillnet method/ IN which, the catching method must be stated in the column 1 of Catch certificate since Nov 2013.

Guideline as below: In column 1 (name, registration number) of the Catch certificate, add the catching method under the name and registration number of the vessel, it must be abbreviation put in the brackets, e.g. (PS), (GN)...”

2.2.5 Joint circular no 34/2014/TTLT-BYT-BNNPTNT-BCT guidance on the labelling of goods for foods, food additives, and packaged food processing aids named as (2).

This circular is the newest and the most detailed presented Vietnamese legislation on labelling of food and it is directly related to R1169/2011. Therefore it in this report’s Annex 7 has been compared article by article with R1169/2011 and comments given.

The comments are the following:

All the comments are listed art by art in the TOC in Annex 4b, beyond is listed the most important.

- Art 1 point 3 in VN “ Joint circular no 34/2014/TTLT-BYT-BNNPTNT-BCT guidance on the labelling of goods for foods, food additives, and packaged food processing aids” in the following named (2) makes the authorities on the safe site concerning export by the following text: Art 1 point 3: “ Labels of the products produced for export must ensure no deviation from true nature of the product, no violation of Vietnam law and the importers’ law”
- In general the VN circular (2) is short and not so detailed as the EU legislation. Especially the list of Allergens is incomplete compared to R1169/2011 Annex II. In VN circular (2) Mollusks and products from them are missing on the list. Also how to write it on the label in order to make it visible for the consumer is missing in the VN circular (2). Additionally the nutrition declaration is not obligatory (should be obligatory from 13 December 2016).
- Frozen non-processed fish products must following the EU R1169/2011 art 10 and Annex III point 6 be labelled with “date of freezing” or if frozen more than one time “date of first freezing” .This is not mentioned in the VN law.

- Art 15 in the VN circular (2) is accepted to omit information of “self life” on the label if the surface of the product is <10cm². This is not according to R1169/2011 art 16 point 2.
- In R1169/2011 art 17 and Annex VI is mentioned the following: “If a product is added proteins of different animal origin, then the name of the food must indicate the presence of added proteins and of their animal origin”. In the same art and Annex is mentioned the following: “Products which give the impression that they are made of a whole piece of fish but actually consist of different pieces combined using other ingredients (e.g. food additives, food enzymes) or other means, need to indicate this” The operator is bound to use the term ‘formed fish’. Additionally in the same art and Annex is mentioned the following: “In the case of foods that have been frozen before sale and which are sold defrosted, the name of the food must be accompanied by the designation ‘defrosted’. This information is not necessary for: a) ingredients present in the final product. b) foods for which freezing is a technologically necessary step of the production process. c) foods where defrosting has no negative impact on the safety or quality of the food. The above mentioned information is not mentioned in VN circular (2).
- In VN circular Addendum 1: Some advises about nutrition is given; however they are not equivalent with R1169/2011 Annex XIV, where the calculation factors are lined up.

3. Animal welfare: focus on Fish and Aquaculture

Vietnam does **not** have any specific requirements for welfare for fish and aquaculture. The proposed new veterinary law under Article 8 is not adequate to address animal welfare in general or specific to species including fish.

4. Traceability: focus on (farmed) Fish and Aquaculture

The VN legislation has been received:

- 1 Circular no. 74/2011/TT-BNNPTNT on Traceability, Recall and Handling of unsafe ...food October 31, 2011
2. Circular no. 03/2011/TT-BNNPTNT on Tracing and Recall of Fishery Products failing to meet food quality and safety requirements, January 21, 2011. (Annex 7 number 1 and 2).

Also the following has been received:

Law on product and goods quality no. 05/2007/QH12 (Annex 7 number 7) is interesting when it comes to traceability.

The above mentioned received VN legislation related to traceability has been studied and compared with the EU rules. Especially R178/2002 art 3, 18, 19 and 20 that lines up the definitions on traceability and recall, R882/20004 art. 13 about crisis Management, R852/2004 where the importance of each step of the production chain is emphasized and the details in R853 and 854/2004 about health/id marks and export rules are lined up.

The VN legislation is short, but mention the most essential subjects when it comes to traceability: Responsibility, the tracing principle: one step back-one step forward, lot information. Tracing and recall.

The Circular no. 03/2011/TT-BNNPTNT, January 21, 2011. (Annex 7 number 2) is about fish and Circular no. 74/2011/TT-BNNPTNT Circular no. 03/2011 is about all foodstuffs. (Annex 7 number 1).

When studying the above mentioned received documents we have not found anything that is not according to the EU rules. The question is however how the system function in practice.

We have during this mission not had the possibility to check how the system function in practice.

In FVO visits from 2009-2012-2014 the traceability concerns were not mentioned.

5. Miscellaneous :

5.1 Export to EU of Honey

At present Vietnam is on the EU export list for Honey

5.2 Export to EU of fruit and vegetables

Export of fruits and vegetables to EU has not been optimized. The government is looking to expand the export of leeches to EU however irradiation costs are high.

Chapter 3: Conclusions

1. Biosecurity: focus on (farmed) Fish and Aquaculture

Bio security should be addressed in general context to see if Vietnam complies with the Basic biosecurity OIE 2014 conditions means a set of conditions applying to a particular disease, and a particular zone or country, required to ensure adequate disease security, such as:

- a. the disease, including suspicion of the disease, is compulsorily notifiable to the Competent Authority; and
- b. an early detection system is in place within the zone or country; and
- c. import requirements to prevent the introduction of disease into the country or zone, as outlined in the Aquatic Code, are in place

This can be done using the new established (2013) PVS tool for Aquaculture. (Vietnam has already done 3 consecutive PVS tool for Animal Health)

Biosecurity, in its simplest term, can be defined as the set of procedures undertaken to prevent, control and eradicate infectious diseases in organisms. This is a basic definition applied to many agricultural industries. With the emergence of new technologies, however, this definition has been modified and adapted for different circumstances, for example, those related to bioterrorism, genetically modified organisms and laboratory animals.

Biosecurity, however, can be seen as a tool, as a mechanism developed to assist and protect agro-industries. Biosecurity in salmonid aquaculture has been in place for several decades. In the shrimp culture industry, however, it was not until the outbreaks of Taura syndrome virus (TSV) in the Americas and white spot syndrome virus (WSSV) in Asia in the early 1990s that the need for rigorous biosecurity practices was highlighted.

In safeguarding the health of any aquatic population, one must consider the threats from pathogens which may be well characterised or new, endemic or exotic, and the exposure

to these can either be prevented or minimised. Safeguarding the health of aquatic animals can be done through the use of an array of physical and hygiene practices at the national, aquatic system and/or farm level. There is also a parallel requirement to ensure that the disease management or intervention practices that are used are applied in an ethical, sustainable manner with no detrimental impact to the farmed population, the environment or to the end consumers of the final products. Within a robust biosecurity framework, each of these prerequisites requires strategic and integrated policies involving key stakeholders at various levels: farms, industry and governments.

Biosecurity at different levels

Biosecurity should be looked at as a whole. Even if, for example, a shrimp producer has good management practices and a biosecurity program in place, this might not be enough to avoid contamination of the production area. If there are no biosecure hatcheries supplying 'clean' post larvae, then the risks of introducing new pathogens into a system are always high. The same principles apply to a biosecurity program at the country level.

The sanitary status of neighbouring countries must be considered at the moment of establishing international trade. Taking all of these into consideration, comprehensive biosecurity programs should have different levels of regulation: international level, national level and producer level.

Biosecurity at the international level

This level of regulation centres on the competency of national governments and the rigour by which legislation, surveillance (where appropriate) and testing are upheld. The main objectives are to develop a system to protect the industry under consideration. It is also to establish rules and mechanisms of trade between countries producing similar products. Enforcement of national legislations between trading nations will help to prevent the import of contaminated shipments of aquatic products and minimise the illegal transboundary movement of stock.

The first step is for the country importing the aquatic products to establish their own sanitary status regarding the aquatic species. Part of this should involve a national screening program of wild and cultured populations for specific pathogens of concern. The World Animal Health Organisation (OIE; <http://www.oie.int/>), for example, has an Aquatic Code with a list of notifiable diseases for each aquatic species. Following surveillance, certain countries may be able to demonstrate and declare that they are free of a specific pathogen.

Zoning and compartmentalisation

If, however, a pathogen is found to be present within a country, it is critical to define where they are found and whether there are areas that are pathogen free. If these areas are delineated by geographical barriers, then these can be considered as zones and the group of animals within it constitutes a subpopulation. In other situations, the appropriate application of management practices may produce a subpopulation that is free of the pathogen. These characteristics are the basis of what is called zoning and compartmentalisation - the first being when the subpopulation is limited by a natural or artificial geographical barrier, and, the second when the subpopulation is confined to a facility with special management practices in place.

In each case, the competent authorities of Vietnam have the authority to designate zones or compartments based on health surveillance assessments of each subpopulation. Once a zone or a compartment is established, the competent authority must specify the surveillance system used to characterise the subpopulations, the method by which each subpopulation is identified and, the traceability system in place to permit each subpopulation to be tracked back to its point of origin. Once zones and compartments are defined, then trade agreements can be established between countries. Importation of any commodity, however, runs the risk of introducing a pathogen into a country. In order to minimise the risk, an importing risk analysis (IRA) can be used as a decision making tool. In general terms, an IRA is a procedure based on risk identification, risk assessment, risk management and risk communication. The IRA can be used by the importing country to impose import conditions or even to refuse importation.

An aquaculture facility, i.e. a hatchery or a farm, can be classified according to their sanitary status, their infrastructure and management level and can then either import aquatic stocks from sites with an equivalent or better score or export to sites with equivalent or lower scores. In each case the movement of aquatic stocks must be in accordance with both local and national regulations.

Sanitary map for each species

This is prerequisite to establishing the sanitary status of the country for the different diseases. It is not possible to establish a biosecurity programme if there is incomplete information on the current status of particular diseases within a country. The first step should be a monitoring programme, at the national level, to determine the precise sanitary condition of aquatic stocks (ie fish or shrimp) in the country, including both cultured and wild populations of a given species. With this information a sanitary map can be defined for each species, then zones and compartments within this can be established. If the importation of live aquatic organisms is necessary, quarantine stations must be available. These quarantine stations can be either governmental or private but they must conform to governmental regulations

National biosecurity protocol for aquatic species

Once the sanitary status is known and the zones and compartments have been delimited, then a national biosecurity protocol can be defined. This protocol must establish how a given aquatic organism will enter the country (as in the case of importations) and how the aquatic organisms may be translocated within the country. The aquaculture facilities (hatcheries and farms) can be classified according to their sanitary status, infrastructure, management level, etc, and then assigned to different, nationally defined categories based on their scores.

Assuming that three categories are defined, category A sites might be those with a high level of biosecurity; category B with a medium level of biosecurity; whilst category C sites might be those with very low or no level of biosecurity in place in their establishments. This will generate a unidirectional flow of products, where products coming from category A establishments can go to establishments in any category; products from establishments in category B can go only to establishments in category B and C; and, products emanating from establishments within category C can go only to other facilities within the same category. This can create a natural tendency for

improvement with the lower level establishments trying to reach higher categories, thereby improving production systems in general.

Requirements for training and laboratories

The implementation of a biosecurity national programme will require numerous conscientious and well trained technicians. Qualified personal should take control of the main access points into the country, inspect hatcheries and farms, maintain surveillance, run laboratory tests, and ensure proficiency, quality assurance and validation etc. The training of technicians, locally or abroad, is a very important component of the whole process. A Reference Central Laboratory (RCL) should be defined, with the capacity to issue national and international health certificates. This RCL can also certify other regional laboratories located within the host country.

Emergency plan

A clear emergency plan must be in place for each disease in the event of a disease outbreak. Official entities must have legal capacity to execute the emergency plan, without interference from other official institutions. For immediate action when required, it is critical that an organisation chart including positions and personnel requirements, responsibilities and capabilities, is already in place and clearly specified. Likewise, a system of economic compensation to the producer(s) must have been contemplated in advance of a disease episode and in the event that mandatory culling of stock is required to either eradicate the disease threat or to curb further spread.

In order to get the benefits of a biosecurity plan, biosecurity should be looked upon as part of the overall management system. This means that many aspects of the production pipeline must be taken into consideration, which will include:

1. broodstock source, quality and management;
2. larvae (post-larvae) quality;
3. stocking densities;
4. feed and feeding regimes;
5. hatchery disinfection and management;
6. pond/system preparation;
7. monitoring of water and soil parameters;
8. disease surveillance;
9. training and record keeping, etc.

Infrastructure

The infrastructure is an important component in any biosecurity plan. Ideally the land surrounding the production unit should be fenced which may be easier for hatchery units and small farms but may not be achievable for larger farm sites. Fencing is used to prevent the entry of wild animals and to deter unauthorised personnel from gaining access to the facilities. The layout of the facility must be planned in such a way so as to minimise cross contamination among different sections. In hatcheries, for example, it is helpful to have a footbath (with an appropriate disinfectant that is changed on a regular basis) and hand disinfectant containers at the entrance of each room. Each unit should have its own equipment, i.e. buckets, jars, etc, and these must be properly identified and should not be removed for use in other areas.

Both the incoming and outgoing water should be treated to minimize pathogen introduction. This should be the case for the incoming water supply, and also for the discharged water to prevent pathogen introduction via effluent water into local watercourses. The use of a recirculating water system, with an appropriate integral water treatment/management system, can be an effective means of reducing the risk of pathogen introduction into production areas. Investing in a spare set of hatchery water supply pipes, which can be changed and sterilized allows hatcheries to disinfect effectively while minimizing the idle time when a hatchery is not producing seed.

A well designed system for the culture of livestock can allow for the isolation of part of the system to be disinfected or treated (in the case of a disease event) without the need for a total shut down in production.

Biosecurity protocols

Written standard operating procedures (SOPs) must be in place before defining biosecurity procedures. A procedure similar to the Hazard Analysis and Critical Control Points (HACCP) can be used to elaborate the biosecurity protocol. The first step is to prepare a production flow diagram (i.e. the movement of animals, water, fresh food and personnel through the on-site systems) and then to identify where there are potential risks of pathogen introduction. Generally, the main source of pathogens is via aquatic animals such as larvae, post larvae, broodstock, insects, water, fresh and live food (e.g. larval feeds, polychaetes, fish etc) and the personnel managing operations. Once the critical control points where pathogen introduction may occur have been identified, it is then possible to establish acceptable limits (i.e. what are the maximum number of pathogens acceptable at each point), to establish a control system (i.e. which mechanisms will be used to detect and quantify the pathogen), to establish corrective actions (i.e. what to do once the predetermined pathogen threshold levels have been reached), and, to maintain a sufficiently detailed record of activities so that the impact of corrective management actions can be assessed and refined as necessary.

When defining a protocol, it should be as specific as possible. If, for example, a disinfectant or a medicant is being used, then it is vital that the protocol specifies the dosage, the duration of application and the regime. For each activity where a risk has been identified, there should be a log that details the name of the person responsible for the job, the date, the time of execution and any observations that were made. Once the protocol is finished and approved, this must then be communicated to the entire team, including security guards, kitchen personnel, maintenance staff, gardeners, etc. The workers must sign the document confirming their participation in the communication meeting to demonstrate that they understand the new protocol and will comply. These protocols, however, should be regarded as “flexible” documents that can be refined and updated whenever needed. It is important that whenever a procedure is revised and updated, it will be communicated to all personnel.

A critical step within a comprehensive biosecurity program revolves around a health surveillance system which regularly monitors and controls the sanitary status of all aquatic livestock on site. Likewise, the surveillance system should be clearly defined and appropriately detailed so that it can be followed without ambiguity. The surveillance system that is used can range from a simple visual observation of the stock to the assessment of aquatic livestock samples and tissues using a sophisticated battery of laboratory techniques, including histology and PCR. This will depend on the capacities of

each laboratory establishment. The frequency of monitoring and the analyses to be carried out should also be defined and all the results recorded.

Technical qualifications

Another key step is that the managers and technicians responsible for production operations should have sufficient experience, training and knowledge to be able to properly guide those working under them. Periodic meetings with site personnel should be organised by the person responsible for each section, in order to refresh procedures, to ensure effective knowledge exchange and to uphold proficiency in husbandry. Underpinning each of these recommended steps is the responsibility of the site personnel. The effectiveness of a biosecurity plan may be measured through the absence of disease and mortality events, while its success is based in effective training, communication, proficiency and compliance. Staff bonus schemes can be used to incentivize effective implementation of the hatchery and farm health plans and biosecurity protocols.

2.New Labeling for foodstuffs.

2.1 The following VN legislation is in force:

- The Government Decree on Labelling of goods 30. August 2006 no. 89/2006/ND-CP named (1).
- Joint circular 34/2014/TTLT-BYT-BNNPTNT-BCT 27. October 2014. Guidance on the Labelling of goods for foods, food additives, and packaged food processing aids 8 named (2).
- Dispatch 1613/QLCL-CL1 Regarding labelling for fishery method as par EC named (3).
- Dispatch 2085/TCTS-KTBVNL- guideline on catching method labelling as required by EC dated 11/8/2014 named (4).
- Dispatch 3027/TCTS-KTBVNL- guideline for catch statement in the Catch certificate, dated 12/11/2013 named (5).

2.2 Comments

The VN circular 34/2014 from 27/10 2014 named (2) is the most relevant document when it comes to living up to the new labelling rules for food in Vietnam.

2.2.1 The Government Decree on Labelling of goods 30. August 2006 no. 89/2006/ND-CP named (1) covers all kind of goods from food to wood furniture and musical instruments. So it is not covering the same as CMO 1379/2013 and R1169/2011. However it does not tell anything problematic related to CMO 1379/2013 and R1169/2011. So it can stay in force.

2.2.2 The 3 short Dispatch's documents about fish named (3), (4) and (5) are small guidelines giving short information to the Fishery sector. They mention short information given in CMO 1379/2013, but are not comprehensive enough and are far from meeting the things that are relevant in this document. However we only interpret them as temporary documents that will be reviewed soon.

2.2.3 So the relevant document for commenting is the above mentioned: The VN circular 34/2014 from 27/10 2014 named (2).

2.2.3a It does not cover the specific consumer information rules related to unprocessed and certain processed fishery and aquaculture products mentioned in CMO 1379/2013. It is the following:

- The commercial designation of the species and its scientific name.
- The production method.
- The area where the product was caught or farmed.
- The category of fishing gear used.
- Whether the product has been defrosted.
- The date of minimum durability, where appropriate and
- Additional voluntary information can also be given.

2.2.3b It does to a certain extent cover the consumer information rules covered by EU FIC R1169/2011, the new EU Regulation covering labelling of all kind of food. However as mentioned in part 2 of this report, the chapter lining up the findings and in the TOC in Annex 6 some essential things for the exporter to the EU to know is missing.

2.2.4 Conclusion/recommendations

We were informed during the first weeks meetings that the establishments have received a translated into VN version of the relevant EU documents and this is a good thing. However we believe that a document/guideline covering/explaining the above mentioned information in a more practical way should be useful for the Fishery sector.

A drafted/proposal guideline is added in Annex 3. Additionally practical training on work shop or like this is proposed.

When it comes to labelling in other Food Sectors than Fishery, f ex. Honey and Vegetables the table prepared in Annex 4a could be used in the further work. In this table comments are given article by article to the new EU “Regulation R1169/2011 of 25 October 2011 on the provision of food information to consumers”. This Regulation covers all kind of pre-packed food including Honey and Vegetables. General food guidelines in food labelling based on this new EU Regulation would be useful for establishments exporting food products.

3. Animal welfare: focus on (farmed) Fish and Aquaculture

It is essential that Vietnam start the dialogue of animal welfare for (farmed) fish and start to work with industry for voluntary Code of Practices

4. Traceability: focus on (farmed) Fish and Aquaculture.

When studying the above mentioned (Annex 7) received documents I have not found anything that is not according to the EU rules.

The question is however how the system function in practice.

We have during this mission not had the possibility to check how the system function in practice.

In FVO visits from 2009-2012-2014 the traceability concerns were not mentioned.

Vietnam should look if all the requirements for farmed fish and aquaculture are met including the labeling related to traceability.

The Ministry of Agriculture and Rural Development (MARD) has approved a plan on pangasius farming and processing in Mekong Delta by 2020.

Accordingly, the farms will be given codes. These codes serve as identification numbers, used for farming registration, contracts with producers of raw materials and exports. This would help improve traceability, reports *VASEP*.

By 2016, the farming area in the Mekong Delta is expected to be 5,300-5,400 hectare, with production of 1.25 to 1.3 million MT, added value products accounted for 8-10 per cent, exports reaching \$2-2.3 billion.

By 2020, farming area in the Mekong Delta is expected to be 7,600-7,800 hectare, with production of 1.8-1.9 million MT, added value products of accounted for 15-20 per cent, exports reaching \$2.6-3 billion.

A **report** released in 2014 with title: Is certification a viable option for small producer fish farmers in the global south? Insights from Vietnam Melissa Marschke n, AnnWilkins 1 University of Ottawa,120 UniversityPrivate,Ottawa,ON,CanadaK1N6N5-2014 : is a concern for the future of aquaculture in Vietnam and should be addressed as a matter of urgency.

5.Miscellaneous

5.1. .Export to EU of Honey

Vietnam is already on EU export list. Further awareness training is needed for bee associations and bee keepers to prevent any problems as in the past

5.2. Export to EU of fruit and vegetables

The manual in the annex should be assessed and a new work shop established include many visits to those facilities with has potential for export potential and hands-on the spot training of the guidelines including the codex guidelines to explain the requirements. This is a lengthy process and should be carefully developed and time given.

RECOMMENATIONS

1. Biosecurity

Proposed is an extensive training in aquatic and fish disease to strengthening the competent authority and to perform the PVS Aquatic tool kit of OIE as done in Veterinary services in Vietnam on three occasions.

2. Labeling

We were informed during the first weeks meetings that the establishments have received a translated into VN version of the relevant EU documents and this is a good thing. However we believe that a document/guideline covering/explaining the above mentioned information in a more practical way should be useful for the Fishery sector.

A drafted/proposal guideline is added in Annex 3. Additionally practical training on work shop or like this is suggested.

When it comes to labelling in other Food Sectors than Fishery, f ex Honey and Vegetables the table prepared in Annex 4a could be used in the further work. In this table comments are given article by article to the new EU “Regulation R1169/2011 of 25 October 2011 on the provision of food information to consumers”. This Regulation covers all kind of pre-packed food including Honey and Vegetables. General food guidelines in food labelling based on this new EU Regulation would be useful for establishments exporting food products.

3. Animal welfare

It is advisable that Vietnam start developing voluntary codes of practices for the aquaculture of farmed fish etc using guidelines, codes of practices from example Australia

4. Traceability

An in depth assessment is recommended for traceability in (farmed) fish and aquaculture and for a possible export of fruits and vegetables to EU