

Compliance of import regulations for India's export of fish / fishery products

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FOOD CONTROL SYSTEM IN INDIA

EXPORTS

- EXPORT INSPECTION COUNCIL OF INDIA
- MINISTRY OF COMMERCE & INDUSTRY

IMPORTS & DOMESTICS

- FOOD SAFETY STANDARDS AUTHORITY OF INDIA
- MINISTRY OF HEALTH & FAMILY WELFARE

Export Inspection Council of India

- * Established by the Act of Parliament
The Export (Quality Control & Inspection)
Act, 1963**
- * Main Objective - Sound development of
export trade through quality control &
inspection**
- * Strength : The only Official Certification
body having no conflict of interest**

Powers under the Act

- * to notify the commodities
- * To specify the type of quality control
- * To establish / adopt or recognize one or more standards.
- * To prohibit the export (if not meeting the importing country's requirements)

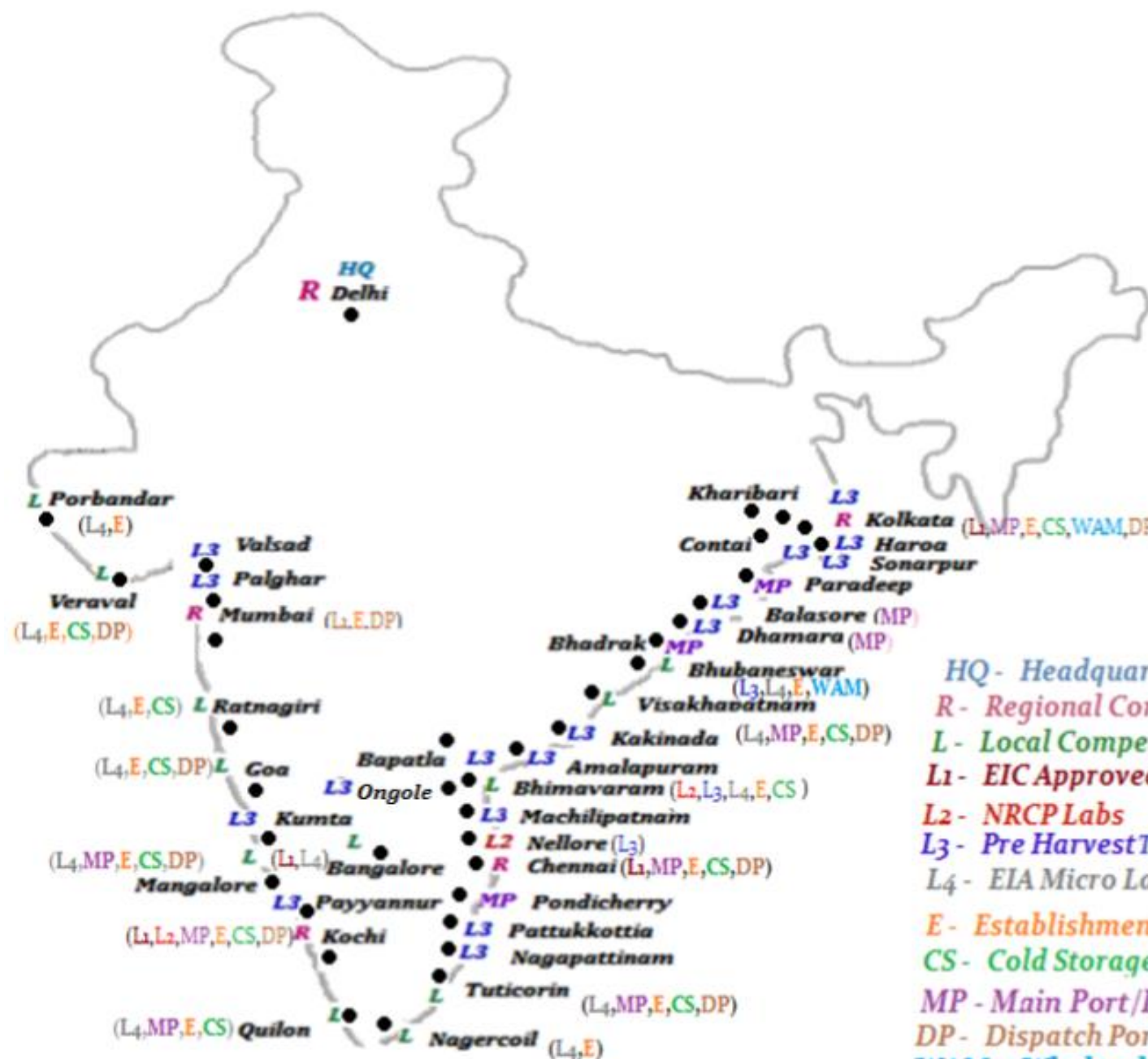


Powers under the Act

- * Powers to create infrastructure for Q.C & Insp.**
- * Powers to obtain information from exporter**
- * Powers to enter and inspect food business facilities**
- * Powers to search**
- * Powers to seize commodities / conveyances**
- * Powers to make Rules & delegation of powers**

Infrastructure for implementation

- * **5 in numbers, established under the Act, with HQs at Chennai, Delhi, Kochi, Kolkata & Mumbai, along with 29 sub offices backed by state of art laboratories accredited against ISO 17025**
- * **Operate under the technical & administrative control of EIC**



- HQ - Headquarter
- R - Regional Competent Authority
- L - Local Competent Authority
- L₁ - EIC Approved labs/EIA Labs (For F&FP)
- L₂ - NRCPLabs
- L₃ - Pre Harvest Testing Labs
- L₄ - EIA Micro Lab
- E - Establishments
- CS - Cold Storage
- MP - Main Port/Landing Sites
- DP - Dispatch Port
- WAM - Wholesale/Auction Market

Laboratory Infrastructure



LEGISLATION PERTAINING TO F & FP

Order No S.O.729 (E) dated 21st Aug 1995

covers all sea waters and fresh water animals or part thereof including their roes, in fresh and chilled, frozen or processed form but excluding frogs

LEGISLATION PERTAINING TO F & FP (cont.)

- * **Notification No S.O.730 (E) dated 21st Aug 1995 lays down systems of certification.**
- * **Rules laid down for implementation of the Order**
- * **Prescribed essential facility requirements & hygienic requirements of Fresh, Frozen and Processed Fish and Fishery Products at all stages of production, storage and transport**

LEGISLATION PERTAINING TO F & FP (cont.)

Orders	Notification
S.O. 729 (E) dated 21st August 1995	S.O. 730 (E) dated 21st August 1995
S.O. 792 (E) dated 17th August 2011	S.O. 415(E) dated 11th April 2002
S.O. 722 (E) dated 10th July 2002	S.O. 1029 (E) dated 24th Sept. 2002
S.O. 464 (E) dated 24th April 2003	S.O. 1034 (E) dated 9th Sept. 2002
S.O. 1227 (E) dated 23rd Oct 2003 &	S.O. 717 dated 25th Feb. 2005
S.O. 1227 (E) dated 31st July 2006	S.O. 612 dated 15th Feb. 2007
	S.O. 1519 (E) dated 16th June 2008
	S.O.2714 (E) dated 28th Oct 2009 &
	S.O. 497(E) dated 10th March 2011

S.O. 497 (E) dated 10th March 2011

- * Definition of Aquaculture farms, hatchery, feed mill, feed, registering authority has been introduced**
- * All links of production chain (landing sites, fishing vessels, aquaculture farms, hatcheries, feed mill) have been brought under the Official Control**

Official Control Programme and Operations by CA

■ Basis of compliance

- Primary responsibility on FBO – plan & implement in-process controls, develop own-check systems (HACCP), maintain records
- EIC to approve & ensure compliance

■ Approval/Renewal of facilities based on Food Safety Management System

Official Control Programme and Operations by CA

- **Compliance ensured through strict surveillance system**
- **National Residue Monitoring and Control**
- **Written procedure to deal with quality issues**
- **EIC lab. approval scheme**

Official Control

MONITORING by EIA Officials to verify (Official Control)

- Sanitation & Hygiene
- Process controls, organoleptic inspection
- Implementation of HACCP plan
- Records
- Observe testing by laboratories & draw samples for proficiency testing
- Draw samples of raw materials, water, ice, finished products, swabs of workers hands and food contact surfaces.
- Draw samples for testing antibiotics, heavy metals, and pesticides etc.

SURVEILLANCE SYSTEM (Cont.)

SUPERVISORY VISITS TO CHECK

- ▶ **By senior officer**
- ▶ **Compliance to norms by processors**
- ▶ **Quality and correctness of monitoring by EIA officer**

CORPORATE AUDITS

- ▶ **Independent audit by EIC to verify operation of scheme by EIAs on yearly basis**

CERTIFICATION OF FISHERY PRODUCTS

- ❖ **Residue control on farm level**
- ❖ **Pre harvest testing / In-house ELISA testing**
- ❖ **Pre export testing**
- ❖ **CFE for each consignment for Indian custom purpose (applicable for notified commodities)**
- ❖ **e health certification for fish & fishery products to be issued by EIAs based on the requirements of the importing countries and GOI Order.**

E-health certificate

Establishment applies on line

captures the primary production information

sample is drawn / tested at EIC approved lab.

Verification of the documents

If in order then the health certificate is issued

provision to issue HC in bilingual

The screenshot shows a web browser window displaying the EIC e-Health Certification portal. The browser's address bar shows the URL www.eiconline.in/EIC/UserLogin/login.aspx. The page header features the EIC logo and the text "Export Inspection Council of India" in English and Hindi, along with "Ministry of Commerce and Industry, Government of India" and "e-Health Certification". Below the header is a navigation menu with links for "Login", "About Online System", "How to apply", "Roles", "Resources / User Manual", and "Contact Us". The main content area is divided into two columns. The left column contains a "Login" form with fields for "User Name" and "Password", a "Sign in" button, and a link for "Sign Up for Merchant Exporter registration". Below the login form are two sections: "TRACK YOUR APPLICATION" with an "Enter Application No." field and a "GO" button, and "VERIFY HEALTH CERTIFICATE" with an "Enter Certificate Reference No." field and a "GO" button. The right column contains a welcome message: "Export Inspection Council of India offers a fast and efficient e-Health certification service, for their exporters. At present this facility is available only for the" followed by a numbered list of eligible categories: 1. EU approved sea food processing establishments, for the consignments of Marine Products (fish & collagen) meant for export to European Union only. 2. EU & Non-EU approved sea food processing establishments, for the consignments of Marine Products meant for export to PR, China, Russian Federation, Iran & other non EU countries. 3. EU approved processing establishments, for the consignments of Animal Casings meant for export to European Union only. 4. Exporters of peanut products to EU & Malaysia. 5. Exporters for Non GMO certification. 6. Approved processors & exporters under voluntary food certification scheme. Below the list, it states "To avail the said e-certification facility the," followed by two sub-points: a. approved establishment (if desires to have the health certificate) has to obtain one time Username and Password from their concerned EIA office. b. merchant exporter has to do the one time registration at the following link <http://www.eiconline.in/EIC/UserLogin/MERRegistration.aspx>. The footer of the page includes "Copyright © 2012 - EIC. All rights reserved.", "Compatible with IE 7.0 & above", and "Powered By Logicsoft, New Delhi". The Windows taskbar at the bottom shows the search bar, taskbar icons, and system tray with the time 9:46 AM and date 20-Sep-16.

Requirements of the importing countries

- 1) EU – PHT / PET / copy of test results / HC in their format**
- 2) Russia – HC in bilingual, testing as per Russian requirements / packing requirements**
- 3) Japan – Testing for Nitrofurantoin parents compound and metabolites.**
- 4) Australia – uncooked prawns are tested for WSSV & YHV**

Mechanism to deal with Quality Issues

- # The issue examined at EIC level / clarification from importing country
- # Facility placed "On Alert" (inc. monitoring; 5 consignments or 3-day codes)
- # Root cause analysis – information from processor / visit to the facility by APE
- # Lab. involved in pre export is assessed
- # Satisfactory – 'on alert' continues till the all the actions completed
- # Unsatisfactory – consignments contaminated/ unsatisfactory hygienic conditions/ samples fail
 - Show cause notice
 - Production & export suspended till corrective actions taken

RASFF (Cont.)

- * **Corrective actions taken and verified**
 - * **Satisfactory:**
 - * **resume production and exports**
 - * **Unsatisfactory:**
 - * **approval withdrawn; delisting from EC website**

Issues

1) Acceptance of Health Certificates by the importing countries electronically

2) Exchange of information in case of quality issues (preferably in English)



Thank You