

The Sea Fish Industry Authority Seafish Technology

Survey of Good Manufacturing Practice Standards in the UK Fish Industry

M. Archer J.W. Denton August 2002



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Seafish Report No. SR546

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Summary

The EU Fish Quality Labelling and Monitoring (FQLM) Concerted Action project brought together industry and scientists from throughout the EU and Nordic countries and sought to establish common views on what constitutes quality, the need for fish quality labelling, the methodology of fish quality measurement and the administration of fish quality labelling schemes. One of the findings of the project was that the application of good manufacturing practice (GMP) is a pre-requisite of fish quality labelling, or quality will be variable and the labels will be meaningless. Fish quality labelling schemes must be based on, or incorporate, GMP standards.

A series of surveys on these issues were carried out within the participating countries over the course of the project. The final survey investigated GMP standards in the fish industry. This report summarises the results of this survey for the UK.

It was found that there are eight independent standards operating across different sectors of the UK fish industry. Two of these are generic food standards whilst the rest are seafood specific. Currently, the ports/auctions, wholesaling and retailing sectors have no standard to which they can be accredited. The majority of the processing trade is accredited to a generic food standard in support of commercial brands.

The UK industry sectors broadly agreed on the need for further GMP standards. General views were that these standards should be nationally or internationally based, cover the entire distribution chain and be keyed to broader industry standards. They should be business certification schemes operated on a basis of independent 3rd party inspections, be devised by industry and be voluntary.

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1. Introduction and Background to the Survey

The fish industry trades in a unique commodity that can spoil very rapidly. Fish freshness quality can be difficult to measure and there is a lack of a standardised method of measurement. This can be a barrier to trade and can also lead to disputes. If quality cannot be measured, it cannot be managed and so it is important that fish quality is defined and is measured on a standardised basis, particularly for trade between countries.

The EU Fish Quality Labelling and Monitoring (FQLM) Concerted Action project originated from the scientific community and followed an earlier EU Concerted Action project which set out to investigate scientific methods of fish quality measurement. FQLM brought together industry and scientists and sought to establish common views on what constitutes quality, the need for fish quality labelling, the methodology of fish quality measurement and the administration of fish quality labelling schemes. Further information is available on the project website www.fqlm.nl

Fourteen countries participated in the project. These included the Netherlands, Denmark, Germany, United Kingdom, Iceland, Norway, Spain, Belgium, France, Portugal, Sweden, Greece, Italy and Finland. Participating industry sectors included trade associations at both national and EU level. This represented all the major sectors of the fish industry including research laboratories, the catching sector, port markets, processing, wholesalers, retailers and fish marketing groups.

A series of meetings and workshops were held over the duration of the project, which were attended by representatives from research institutes and industry. These provided the opportunity for discussion and to plan future work. Over the course of the project, a series of surveys were devised for each participating country to complete in conjunction with and on behalf of their industry. Surveys investigated commercial definitions of fish quality, quality measurement practices, the nature of the fish distribution chains and the needs for fish quality information and for quality labelling.

One of the findings of the FQLM project was that the application of good manufacturing practice (GMP) is seen as a pre-requisite of fish quality labelling, or quality will be variable and the labels will be meaningless. Fish quality labelling schemes must be based on, or incorporate, GMP standards. As such, the final survey investigated the current application and perceived needs for GMP standards in the European fish industry. This report summarises the results of this survey for the UK. The results are also being collated at an international level and are to be published in that form by the FQLM project.

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2. Description of the Survey

2.1 The FQLM Questionnaire

The FQLM survey was devised by Seafish in consultation with the FQLM project management team. The survey questionnaire, which was issued to the nominated research organisation in each participating country, is given in Appendix I. This describes the purpose and the methodology of the survey including the tables of information to be completed. The survey covered all sectors of the industry, from catchers to retailers, and considered both GMP guidance schemes and accreditation schemes. It was precise in its information requirements but the details of carrying it out were left to the research institutes who knew best how to approach their industry.

2.2 Carrying out the Survey

Seafish carried out the UK survey during Spring 2002.

To cover the existing GMP standards a list of known standards was drawn up by consulting members of Seafish's Quality Assurance section. A total of eight standards were identified. For each standard, the series of questions in the FQLM questionnaire had to be answered. This was carried out by consulting relevant websites belonging to the respective organisations or using other published data. The different organisations running the standards were contacted directly for any information that was not available by these means.

To cover the perceived needs for further GMP standards, a questionnaire based on the FQLM information requirements was devised and sent by post or e-mail to industry representatives and organisations, including the trade associations. This questionnaire is given in Appendix II. The addressees were chosen by their participation in Seafish Advisory Committee meetings, which should include representatives of all sectors, and by contacts already well established in the various sectors by Seafish staff.

A total of 85 questionnaires were sent out but some of the organisations represent more than one sector and so the total of sector specific opinions sought was 106. Table 1, overleaf, shows the numbers of opinions sought and received on a per sector basis. Of the 106 opinions sought, 58 were received (55%)



Table 1 The number of opinions sought and received by sector

Industry sector	Number of opinions sought	Number of responses
Catching sector / aquaculture	29	11
Port markets / auctions	16	8
Processing	36	23
Wholesalers	13	9
Retail / catering	12	7
Total	106	58

When all the responses were received they were collated, categorised and analysed by industry sector.



3. Results

3.1 Survey of existing GMP standards

The eight GMP standards identified are shown in Table 2 below.

Table 2 The GMP Standards Identified

GMP Standard
British Retail Consortium Technical Food Standard
European Food Safety Inspection Service Standard
Seafish Fish Friers Quality Award
Scottish Quality Salmon Tartan Quality Mark
Quality Trout UK
Seafood Scotland Vessel Quality and Hygiene Scheme
Superior Quality Shetland Salmon
Frozen at Sea Fillets Association Standard

The completed questionnaires for each of these standards are shown in Tables 3 to 10 overleaf.



Table 3 The British Retail Consortium Technical Standard

	Information on the Existing GMP Standards													
Name of GMP standard	British Re	tail Consc	ortium	Techni	cal Standa	ırd								
'Owners' or originators of the standard	British Re	tail Consc	ortium											
Is this in general a food industry standard or a specialised fish industry standard	Genera stan			/		andard section	with fish Is			Specia industry				
Geographic extent of standard	Regi	ional	[ı	Nationa	al			Interr	nationa	al	✓	
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	Currently EN45004 but in April/May 2002, it will be changing to EN45011													
Types of fish covered by the standard	demer	Captured Captured demersal fish Pelagic fish					Captured shellfish		Farr	ned fish		Farme	d shellfish	
Sectors covered by the standard	Farms / Vessels	Ports	Auctio	ons	Transporter	S	Storers	Processors		Wholes alers	Retail	ers	Caterers	
Subject matter of standard		ent Controls umentation	and	Food safety practices				n quality actices	Quantified produced quality standard				ological or manitarian issues	

Continued



Table 3 continued

Status of standard	Established in Law		Es	tablished by official standards body			ablished by industry	\/-	l l	Participation	la malada m	
					standards body		'	nuusii y	VO	luntary	/ IV	landatory
								~		/		
Role of standard	A guida	nce standa	rd	C€	A business ertification scheme			Opera	ates a re	tail pro	oduct label	
	F Farm/					Yes 🗌			No 🗸			
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farm/ Vessels	Ports	Auctio	ons	Transporters	Sto	orers	Processors	Who		Retailers	Caterers
	%	%		%	%		%	60% *		Nholes alers Retailers %		%
If a certification scheme, the auditing of the accredited businesses	Officia	al auditino	9	Inde	ependent 3 rd part auditing	у	Stand	dard 'owner' au	uditing		No external	auditing
					~							
If a certification scheme, its transparency	The details of the star			ındard are published			7	he list of accredited bus			iesses is pub	lished
	Yes ✔			No 🗌				Yes 🗌			~	

^{*} estimated



Table 4 The EFSIS standard

	Information on the Existing GMP Standards													
Name of GMP standard	European	Food Sta	ndard	s Inspe	ction Serv	ice Sta	ndard							
'Owners' or originators of the standard	Meat & Li	vestock C	ommis	ssion, C	Campden 8	& Chorle	eywood F	ood Rese	arch /	Associatio	n			
Is this in general a food industry standard or a specialised fish industry standard	Genera stan		1	/		andard sections	with fish S			Specia industry				
Geographic extent of standard	Regi	onal			1	Nationa	al			Intern	ationa	ıl	~	
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	EN45004													
Types of fish covered by the standard	Capt demer	sal fish		Captu Pelagio			Captured shellfish		Farr	med fish		Farme	d shellfish	
Sectors covered by the standard	Farms / Vessels	Ports	Auct	ions	Transport	ers	Storers	Process	ors	Whole-salers	Reta	ilers	Caterers	
Subject matter of standard		ment Contro cumentation		Food safety practices			Fish quality practices			uantified pro quality standa		hui	ological or manitarian issues	
		/			<i>'</i>								<i>'</i>	

Continued



Table 4 continued

Status of standard	Established in Law			Established by official standards body			shed by ustry	V	P oluntary	articipation Ma	indatory			
						•	/		✓					
Role of standard	A guidan	ce standard	C	A business certification scheme			Oper	ates a	s a retail product label					
		•		•			Yes 🗌			No 🗸				
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farms / Vessels Ports Auction		ons	Transporters	Storers	Processo	ors	Whole - salers	Retailers	Caterers				
	%	%	,	%	10%*	10%*	60%		%	%	<5%			
If a certification scheme, the auditing of the accredited businesses	Officia	l auditing			dependent party auditing	Standar	d 'owner' a	auditin	g I	No external a	auditing			
					•									
If a certification scheme, its transparency	The de	etails of the	standaı	rd ar	e published	Th	e list of ac	credite	ed busine	esses is publ	ished			
	Υe	es 🗌		No 🗸			Yes 🗸			No [

^{*} estimated



Table 5 The Seafish Fish Friers Quality Award

	Information on the Existing GMP Standards												
Name of GMP standard	Fish Friers	Quality A	ward										
'Owners' or originators of the standard	Sea Fish Ir	ndustry A	uthorit	.y									
Is this in general a food industry standard or a specialised fish industry standard	Gene food sta					d stand fish sec				Special industry			~
Geographic extent of standard	Regional National V International												
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	Is a mixture of known GMP and several ISO standards												
Types of fish covered by the standard	Captu demersa			Captı Pelagi	c fish		Captured shellfish		Farr	ned fish		Farme	d shellfish
	<i>'</i>												
Sectors covered by the standard	Farms / Vessels	Ports	Aucti	ions	Transporte	orters Storers		Proces	sors	Whole- salers	Reta	ilers	Caterers
													~
Subject matter of standard		ent Controlumentation		Foo	od safety prac	tices	Fish quality practices			Quantified produced quality standard		hur	ological or manitarian issues
		•			•			~		•			
													Continued



Table 5 continued

Status of standard	Establi	Established in Law			Established by officia	al		ablished by		Participation			
					standards body			industry	Voluntai	y N	/landatory		
					•			•	~				
Role of standard	A guida	A guidance standard			A business certification scheme	!		Ор	erates a retail	retail product label			
		•			~		١	∕es 🗸 (but v	oluntary)	No			
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farms / Vessels	Ports	Auctio	ons	s Transporters		rs Processors		Whole- salers	Retailers	Caterers		
	%	%		%	%		%	%	%	%	5%		
If a certification scheme, the auditing of the accredited businesses	Offici	ial auditin	g		Independent 3 rd party auditing			andard 'owne	er' auditing	No exterr	nal auditing		
					•								
If a certification scheme, its transparency	The	details o	f the st	standard are published			-	The list of ac	credited bus	sinesses is p	ublished		
	١	∕es ✔		No 🗌				Yes 🗸	No 🗌				



Table 6 The Scottish Quality Salmon Tartan Quality Mark

	Information on the Existing GMP Standards												
Name of GMP standard	Tartan Qu	uality Mark	(
'Owners' or originators of the standard	Scottish (Quality Sal	mon										
Is this in general a food industry standard or a specialised fish industry standard	Gen food st					d stand fish sec				Specia industry			~
Geographic extent of standard	Regional V National International												
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	EN45011												
Types of fish covered by the standard	Cap demer			Capti Pelagi			Captured shellfish		Farm	ned fish		Farme	d shellfish
										~			
Sectors covered by the standard (also covers feed producers, small producers, ongrowers, packing	Farms / Vessels	Ports	Auctio	ons	Transporters	s Storers		Processors		Whole- salers	Retaile	ers	Caterers
stations and co-operative sales organisations)								•					
Subject matter of standard		ement Contro ocumentation		Food safety practices			Fish quality practices		Quantified pro quality standa				ological or manitarian issues
											•		

Continued



Table 6 continued

Table o Continued												
Status of standard	Establish	Established in Law		Established by official standards body			olished by dustry		Voluntary	Participation y M	1andatory	
								~		•		
Role of standard	A guidanc	e standard		Cf	A business ertification scheme			Ореі	rates	a retail pro	oduct label	
	•	rms / Yes 🗸 Whole-						No [
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farms / Vessels	Ports	Auctio	ons	Transporters	Sto	torers	Processors		Whole- salers	Retailers	Caterers
	65%	%		%	%		%	55%		%	s Retailers	%
If a certification scheme, the auditing of the accredited businesses	Official	auditing		3'	Independent rd party auditing		Standa	ard 'owner' a	auditi	ing	No external	auditing
					~							
If a certification scheme, its transparency	The details of the standa			dard are published			Th	ne list of acc	redit	ed busin	nesses is pub	olished
	Yes 🗸			No 🗌				Yes 🗸				



Table 7 Quality Trout UK

	Information on the Existing GMP Standards													
Name of GMP standard					t UK Hatch eviously Sco				UK	Farm St	andard	d and	the Quality	
'Owners' or originators of the standard	British Tro	out Assoc	iation											
Is this in general a food industry standard or a specialised fish industry standard	Genera stand					od stanc fish sec				Specia industry			~	
Geographic extent of standard	Regi	Regional National V International												
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	EN45011	EN45011												
Types of fish covered by the standard	Capt demers			•	tured jic fish		Captured shellfish		Farn	ned fish		Farme	d shellfish	
										~				
Sectors covered by the standard	Farms / Vessels	Ports	Auctio	ons	Transporters	s S	Storers	Processors		Whole- salers	Retail	ers	Caterers	
	•							•						
Subject matter of standard		ment Controcumentatio		Fo	od safety prad	ctices		n quality actices		uantified pro uality stand			ological or manitarian issues	

Continued



Table 7 continued

Status of standard	Establi	shed in Law	I		ablished by official standards body			lished by lustry	Vol		articipation	ndotoni
					standards body		1110	iusii y	VOI	untary	IVIA	ndatory
								/		/		
Role of standard	A guida	nce standar	rd	ce	A business rtification scheme			Oper	ates a ret	ail produ	ıct label	
	POUC L AUCTIONS		✓			Yes 🗸			No 🗌]		
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farms / Vessels	rms / ssels Ports Auctions		tions Transporters		Sto	Storers Processor		:	hole- alers	Retailers	Caterers
	50%*	%		%	%		%	50%*		%	%	%
If a certification scheme, the auditing of the accredited businesses	Officia	al auditing	I		Independent party auditing		Standa	rd 'owner' a	uditing	No	o external a	uditing
					•							
If a certification scheme, its transparency	The d	letails of t	he sta	ndard	are published		Th	The list of accredited b		businesses is pub		shed
	Y	′es ✔			No 🗌			Yes 🗸			No 🗆	

*estimated



Table 8 Seafood Scotland Vessel Quality and Hygiene Scheme

	Information	n on the E	existing	GMF	Standa	ırds					
Name of GMP standard	Vessel Qua	ality & Hygi	iene Scl	heme	!						
'Owners' or originators of the standard	Seafood S	cotland									
Is this in general a food industry standard or a specialised fish industry standard											v
Geographic extent of standard	Seafood Scotland General food standard with fish sections Industry standard Regional National International Is a mixture of known GMP and several ISO standards Captured demersal fish Pelagic fish shellfish Farmed fish Pelagic fish Pelagic fish Storers Processors Whole-salers Farms / Vessels Ports Auctions Transporters Storers Processors Whole-salers Retailers										
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	Is a mixture	e of known	GMP a	nd se	veral IS0	O stand	lards				
Types of fish covered by the standard	Captured C								Farmed fish	Farm	ed shellfish
	General food standard Regional Is a mixture of known GI Captured demersal fish Farms / Ports			•		~ (/	V <i>ephrops</i> on	ly)			
Sectors covered by the standard		Ports	Auc	tions	Transp	orters	Storers	Processors		Retailers	Caterers
	•										
Subject matter of standard				Food	safety pra	ctices		quality	Quantified produ quality standard	^{JCl} h	Ecological or umanitarian issues
		•						•	•		

Continued



Table 8 continued

						_			Dealle Control			
Status of standard	Establi	shed in Lav	N		stablished by official standards body			olished by dustry	,	Voluntary	Participation	Mandatory
			ļ					,	'	v Olumai y	; IVI	iaridator y
					•		l	~		•		
Role of standard	A guida	nce standa	rd	Cf	A business ertification scheme			Opera	ates a	retail pro	oduct label	
	/		✓		,	Yes 🗌	No 🗸		(but is a long	term plan)		
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farm / Vessels	Dorte I Alletione		ons	s Transporters Sto		orers Processors			Wholes alers	Retailers	Caterers
	6%	%		%	% %		%	%		%	%	%
If a certification scheme, the auditing of the accredited businesses	Officia	al auditinç	g	31	Independent 3 rd party auditing		Standa	ard 'owner' au	uditin	ng	No external	auditing
					•		<u> </u>					
If a certification scheme, its transparency	The details of the standar		ndard	are published		The list of ac		The list of accredited b		esses is pub	olished	
	Y	Yes ✓		No 🗌		,	Yes 🗌	No 🗸				



Table 9 Superior Quality Shetland Salmon

	Informati	on on the	Exist	ting Gl	MP Standa	rds							
Name of GMP standard	Superior (Quality Sh	etland	Salmo	on								
'Owners' or originators of the standard	Shetland organisati		Quali	ty Cor	ntrol (which	h was	establish	ed by the	loc	cal autho	rity aı	nd loc	al industry
Is this in general a food industry standard or a specialised fish industry standard	Genera stan					andard section	with fish s			Specia industry			~
Geographic extent of standard	Regi	onal	(/	1	Vationa	al			Interi	nation	al	
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	Accredite	d to EN45	011 th	rough	Scottish Fo	ood Qu	ality Certif	fication					
Types of fish covered by the standard	Captured Captured Captured Farmed fish Farmed shellfish										d shellfish		
										~			
Sectors covered by the standard	Farms / Vessels	Ports	Auctio	ons	Transporters	s S	Storers	Processors		Whole salers	Retail	lers	Caterers
	•							~					
Subject matter of standard		ment Contro cumentatio		Foo	od safety prac	ctices		n quality actices		uantified pro uality stand			ological or manitarian issues

Continued



Table 9 continued

Status of standard	Establi	shed in La	ıW		ablished by officia standards body	al Es	tablished by industry	Volu	Participat ntary	on Mandatory	
							~	•	/		
Role of standard	A guidance standard			cer	A business tification scheme	;	Opera	tes a reta	ail product lab	el	
	<i>-</i>				•		Yes 🗌		N	o 🗸	
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farms / Vessels Ports Auction		tions Transporters St		Storers	Processors	Whol -sale	RATAIIARS	Caterers		
is accircuited (70)	>75%	%		% %		%	>75%	%	%	%	
If a certification scheme, the auditing of the accredited businesses	Offici	al auditing		3	Independent rd party auditing	Sta	ndard 'owner' a	uditing	No exter	nal auditing	
					•						
If a certification scheme, its transparency	The details of the sta			ndard	are published		The list of acc	redited b	usinesses is	oublished	
	Y	′es 🗌		No ✓ not outwith the participants			Yes 🗌		No ✓ but are in the process of doing so		



Table 10 Frozen at Sea Fillets Association

	Information	on on the	e Exist	ting GI	MP Standa	rds							
Name of GMP standard	Frozen at	Sea Fillet	ts Asso	ociation	า								
'Owners' or originators of the standard	Industry												
Is this in general a food industry standard or a specialised fish industry standard	Genera stand		[andard v sections	with fish S			Specia industry			•
Geographic extent of standard	Regi	onal	[1	Vational	I			Interr	nationa	ıl	~
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	Vessel specific - based on HACCP Captured Captured Captured												
Types of fish covered by the standard	Captured Captured Captured Gemersal fish Pelagic fish Shellfish Farmed shellfish									d shellfish			
	•	•											
Sectors covered by the standard	Farms / Vessels	Ports	Auctio	ons	Transporters	s S	Storers	Processors		Whole- salers	Retaile	ers	Caterers
	•												
Subject matter of standard		ment Contro cumentation		Foo	od safety prac	ctices		n quality actices	Quantified prod quality standar			hui	ological er nanitarian issues
	and documentation practices practices quality standards issues										•		

Continued



Table 10 continued

Status of standard	Establi	ished in Lav	W	Es	stablished by official standards body			olished by dustry	V	oluntar	Participation	landatory	
								~	-	~	,		
Role of standard	A guida	A guidance standard		C	A business ertification scheme			Ope	rates a i	retail pro	oduct label		
	~						Yes 🗌			No 🗸			
If a certification scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is accredited (%)	Farms / Vessels	I Ports I Auction		ns	Transporters	Sto	orers	Processors		/holes ers	Retailers	Caterers	
	10%	%		% %		%	%		%	%	%		
If a certification scheme, the auditing of the accredited businesses	Offici	al auditing	g	3	Independent rd party auditing		Standa	ard 'owner' a	nuditino	9	No external	auditing	
								•					
If a certification scheme, its transparency	The details of the star		andard are published			Tł	ne list of acc	redited	d busin	olished			
	Y	Yes 🗌		V			Yes 🗌				~		



3.2 The perceived needs for further standards

The collated responses from industry are shown in Table 11 below.

Table 11 Responses from industry

		In	•	views on the r GMP standard:		
		Farms / Vessels	Ports / Auctions	Processors	Whole- salers	Retailers / Caterers
Number of responses received		11	8	23	9	7
Do industry sector representatives consider further	Largely in favour	73%	88%	83%	67%	71%
GMP standards to be desirable or necessary	Divided					
	Largely against	27%	12%	12%	33%	29%
At what level should GMP standards be developed?	Regional	12%	12%	11%	12%	18%
	National	33%	63%	58%	44%	55%
	International	50%	25%	31%	44%	27%
Should GMP standards be	Sectoral	67%	12%	43%	50%	25%
developed on a sectoral or whole chain basis?	Whole chain	33%	88%	57%	50%	75%
Should local or sectoral	Yes	60%	88%	91%	100%	100%
standards be keyed to broader industry standards?	No	40%	12%	9%		
How should GMP standards be established?	By Legislation	17%	11%	20%	12%	25%
	By official standards bodies	17%	22%	24%	44%	25%
	By Industry agreement	66%	67%	56%	44%	50%

Continued



Table 11 continued

		Farms / Vessels	Ports / Auctions	Processors	Whole- salers	Retailers / Caterers
Should participation in GMP standards be voluntary?	Yes	64%	63%	35%	67%	29%
	No	35%	37%	65%	33%	71%
Should GMP standards be purely guidance standards or be supported by business certification schemes	Purely guidance standards	33%	12%	17%	50%	29%
	Supported by certification schemes	67%	88%	83%	50%	71%
How should business certification schemes be	By officials	8%		4%	8%	23%
controlled?	By independent 3 rd party auditing	42%	37%	80%	50%	44%
	By industry	50%	63%	16%	42%	33%



4. Discussion

4.1 Survey of existing GMP Standards

The UK distribution chain is not wholly covered by one standard, instead at least eight standards exist independently across different sectors of the industry. Two of these are generic food standards (BRC Technical Standard and EFSIS) whilst the rest are seafood specific. All of the standards cover management control, documentation and food safety practices, although only the seafood specific standards include fish quality practices. Whilst the general food standards can be applied throughout the UK and to different species or products, the fish standards apply to one species or generic type of fish i.e. demersal fish only or farmed fish only, or to a particular region of the UK i.e. Scotland or Shetland. Only the finfish aquaculture sector has vertically integrated schemes including primary production, processing and a retail label.

A significant proportion of the fish processing trade (an estimated 60% of the volume of trade) is by processors accredited to one or both of the generic food standards, however uptake by other sectors to which these standards can apply is low. With the exception of the standards that apply to the finfish aquaculture sector, the seafood specific standards currently only cover a small proportion of trade. Currently, the ports/auctions, wholesaling and retailing sectors have no specific standard to which they can be accredited.

All of the GMP standards are voluntary and were established solely by industry or, in the case of two of the standards, by industry in conjunction with an official body. The majority of the standards are based on European Committee for Standardisation (EN) standards. Most of the standards are audited by an independent third party.

Although five of the GMP standards publish the actual details of their respective standard in a technical manual format, these may only be made available to applicants or to appropriate organisations upon request. Only one of the GMP standards permits the sale of their technical manual to any interested parties. At the time of the survey, only four of the standards published a list of members, one had plans to do so but the remaining three standards showed no interest in making their list of members publicly available.

Only three of the standards have their own labels which can be displayed on retail packaging or at the point of retail sale or be used for other marketing purposes. This is not to underestimate the value of the other standards as discussion within the FQLM project has emphasised the importance of establishing standards within the distribution chain to support the 'brands' of the big processors and the multiple retailers. These brands are now the largest force in the retail market.



4.2 The perceived needs for further standards

All of the industry sectors were largely in favour of further GMP standards which should be introduced on a national or international level. The port/auction, processing and retail/catering sectors were largely in favour of GMP standards that apply to the whole fish distribution chain whereas wholesalers are divided between standards being developed on a sectoral or whole chain basis. The catching/farming sector was strongly in favour of standards being applied on a sectoral basis only (although it should be noted that finfish aquaculture already has vertically integrated schemes).

All of the industry sectors felt that local or sectoral standards should be keyed to broader industry standards and that the standards should be established by industry agreement. However, wholesalers equally felt the need for standards to be developed by official bodies.

There was significant division over whether standards should be voluntary. The catching/farming sector, ports/auctions and wholesalers supported this view, however processors and retailers/caterers were of the opinion that GMP standards should be mandatory.

Most of the responses were strongly in favour of GMP standards being supported by certification schemes, although the wholesalers were somewhat divided in their opinion and felt that they should be purely guidance standards.

Processors, wholesalers and retailers/caterers were largely in favour of certification schemes being controlled by an independent third party, although there was also strong support from the wholesalers and retailers/caterers for industry to control the standards. The catching/farming and port/auction sectors generally favoured industry control but also with strong support for independent third party control.

4.3 Views from other countries

The reports from other countries have also supported the general need for GMP standards although it is noted that in a number of countries there is a greater culture of, and desire for, official controls.



5. Conclusions

The engagement of industry, research organisations, academia and other participants in the FQLM Concerted Action project has helped to establish a common understanding of the current and future needs for fish quality labelling and monitoring. The project has identified that GMP is an essential basis for any fish quality labelling scheme. This survey set out to identify and describe existing GMP standards operated in the fish industries of the European and Nordic States and industry views on the needs for further GMP standards.

The survey identified eight GMP standards operated in the UK fish industry, with two of these standards being generic food industry standards and the remainder being specialised fish industry standards. The standards share many common features:

- they are nearly all business certification schemes
- they are generally based on an EN standard
- they were all established by industry
- they generally cover management controls, documentation and food safety standards.

The schemes are generally sector or geographic area specific although there are vertically integrated schemes operated in the finfish aquaculture sector. There is no specific standard for the ports/auctions, wholesaling and retail sectors. Only three of the schemes have their own retail identity.

The most significant schemes in respect of the volume of trade covered are the BRC and EFSIS food industry schemes applied to the processing sector in support of commercial brands.

All sectors of the UK fish industry were of the general view that there is a need for further GMP schemes although views on their required scope and nature varied. Views generally expressed were that schemes should:

- be nationally or internationally based
- be keyed to broader industry standards
- apply to the whole distribution chain
- be business accreditation schemes operated on a basis of independent third party inspections
- be devised by industry and be voluntary

Appendix I The FQLM Survey Questionnaire

SR546 - Appendices i

FAIR PL98-4174 CONCERTED ACTION

Fish Quality Labelling and Monitoring -Survey of Existing GMP Standards in the Fish Industry

W Denton December 2001

SR546 - Appendices ii

1. Introduction and Purpose

The FQLM Concerted Action has considered the needs for fish quality labelling in the various distribution chains and the technical, practical and commercial issues that are involved. The project has now to consider how fish quality labelling schemes should be established and operated.

The application of good practice throughout the distribution chains is seen to be a pre-requisite of fish quality labelling, or quality will be variable and the labels will be meaningless. Fish quality labelling schemes must be based on, or incorporate, good manufacturing practice (GMP) standards.

The purpose of this survey is to identify existing GMP standards applied in the fish industry, including the scope of those standards and how they are operated, and to determine views on the needs for further standards and how they should be established and operated.

2. Outline of the Survey

The survey covers GMP guidance standards and accreditation schemes that are above and beyond the basic requirements of food legislation. It covers standards that are applied in any or all sectors of the fish industry, from catchers to retailers. It should include generic food industry standards, as well as those specific to the fish industry, where those standards are significant to the operation of the fish industry.

The survey is to be led by the research institute in each of the participating countries. It involves listing the existing GMP standards operated in each country, together with further information on the scope and operation of those standards, and a summary of the views of the various industry sectors on the need for further standards and how they should be established and operated. Simply formatted tables are provided for the tabulation of this information in a standardised form.

It is envisaged that the research institutes will consult with representatives of the various industry sectors, for example with the trade associations, passing on the queries and then collating a consolidated national response. The means of doing this is left to the research institutes as they are knowledgeable of the workings of their own industry. It may well be necessary for them to provide some further explanation of the survey. Bodies such as trade associations may well require their management committee to consider the further needs for GMP standards. However, it may be possible to carry out much of the survey by telephone.

Time remaining for the FQLM project is limited and so the survey is kept as simple as possible. The research institutes are requested to forward their findings to the quality labelling sub-group co-ordinator, Begona Perez Villareal bperez@azti.es, by 15th February 2002 so that they can be summarised and presented to the final FQLM conference at Firenze in April 2002.

3. The Tables

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The tables are Microsoft Word documents that are intended for completion electronically or on paper. Please forward the consolidated responses electronically. Much of the content is in a check-box format and, depending on the question, it may be appropriate to check several boxes in each row.

Table 1 is a simple list of the existing GMP standards applied in the country's fish industry.

Table 2 is to be completed for each of the standards listed in Table 1. It provides further information on the origin, scope and administration of the standards.

Table 3 poses a series of questions to the representatives of the main sectors of the fish industry, on the need for further GMP standards and how they should be established and operated.

If necessary, notes providing further explanation can be attached to the consolidated response.

Any queries on the completion of the tables should be directed to Wesley Denton w_denton@seafish.co.uk or to Begona Perez Villareal.

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Table 1	Existing GMP Standards
Country:	<type country="" name="" tab="" then=""></type>
List of names of existing GMP standards	<type each="" field="" name="" tab="" text="" then="" through=""></type>
applied in the fish industry	

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Table 2	Information on the Existing GMP Standards												
Country:	<type th="" y<=""><th>our cou</th><th>untry nam</th><th>e then ta</th><th>ab></th><th></th><th></th><th></th><th></th><th></th><th></th></type>	our cou	untry nam	e then ta	ab>								
Name of GMP standard	<type nan<="" td=""><td>ne of stand</td><td>lard then tab></td><td>,</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></type>	ne of stand	lard then tab>	,									
'Owners' or originators of the standard	<type nan<="" td=""><td>ne then tab</td><td>)></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></type>	ne then tab)>										
Is this in general a food industry standard or a specialised fish industry standard (check boxes)	General food Standard with fish Specialised fish Industry standard												
Geographic extent of standard (check boxes)	Regional National International												
Names of any general standards on which the standard is based (e.g. EN45011 or CODEX)	<type nan<="" td=""><td>nes then ta</td><td>ıb></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></type>	nes then ta	ıb>										
Types of fish covered by the standard(check boxes)	Capt demer	ured sal fish	·	tured Jic fish		Captured shellfish		Farn	ned fish	Farme	d shellfish		
				<u> </u>									
Sectors covered by the standard (check boxes)	Vessels	Ports	Auctions	Transporte	ers	Storers	Proce	essors	Whole salers	Retailers	Caterers		

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Table 2 continued.....

Subject matter of standard (check boxes)		ment Cont cumentatio		Foo	od safety practices	5		quality ctices	Quantified produc quality standards			Ecological humanitaria issues	
							[
Status of standard (check boxes)	Established in Law				ablished by officia standards body	l Es	Established by industry			oluntar	Participation ntary Mand		ındatory
							[
Role of standard (check boxes)	A guidance standard				A business accreditation scheme			Opera	ates a r	product label			
							Yes 🗌				ſ	No []
If an accreditation scheme, the estimated proportion of trade (in the type of fish and sector covered by the standard) that is	Vessels	Ports	Aucti	ons Transporters St		Storers		Processors		hole Ilers	Retailer	S	Caterers
accredited (%)	%	%		%	% %			%		%	%	5	%
If an accreditation scheme, the auditing of the accredited businesses (check boxes)	Offici	al auditing		Ind	ependent 3 rd party auditing	St	anda	ard 'owner' au	uditing	No external auditir		uditing	
If an accreditation scheme, its transparency (check boxes)	The details of the sta			andard are published			T	The list of acc	credited	esses is p	sses is published		
	Yes 🗌			No 🗌			Yes 🗌				No 🗌		

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Table 3		Industry sector views on the needs for further GMP standards					
Country:		<type country="" name="" tab="" then=""></type>					
Main industry sectors		Vessels	Ports/Auctions	Processors	Wholesalers	Retailers/Caterers	
Do industry sector representatives consider further GMP standards to be desirable or necessary(check boxes)	Largely in favour						
	Divided						
	Largely against						
At what level should GMP standards be developed? (check boxes)	Regional						
	National						
	International						
Should GMP standards be developed on a sectoral or whole chain basis? (check boxes)	Sectoral						
	Whole chain						
Should local or sectoral standards be keyed to broader industry standards? (check boxes)	Yes						
	No						

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Table 3 continued

How should GMP standards be established? (check boxes)	By Legislation			
	By official standards bodies			
	By Industry agreement			
Should participation in GMP standards be voluntary? (check boxes)	Yes			
	No			
Should GMP standards be purely guidance standards or be supported by business accreditation schemes (check boxes)	Purely guidance standards			
	Supported by accreditation schemes			
How should business accreditation schemes be controlled? (check boxes)	By officials			
	By independent 3 rd party auditing			
	By industry			

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Appendix II

The UK Questionnaire on the Perceived Needs for Further GMP Standards

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Industry sector views on the needs for further good manufacturing practice (GMP) standards

Name of Company or Industry Organisation:	

Question		Tick one answer to each question
	Catching sector	
	Processing	
Which sector is your business/organisation engaged in?	Wholesaling	
1111	Ports/auctions	
	Retailing/catering	
Would you consider further GMP standards desirable	Yes	
or necessary?	No	
At what level should GMP standards be developed?	Regional	
	National	
	International	
Should GMP standards be developed on a sectoral or	Sectoral	
whole chain basis?	Whole chain	
Should local or sectoral standards be keyed to	Yes	
broader industry standards?	No	
How should GMP standards be established?	By Legislation	
	By official standards bodies	
	By Industry agreement	
Should participation in GMP standards be voluntary?	Yes	
	No	
Should GMP standards be purely guidance standards	Purely guidance standards	
or be supported by business accreditation schemes	Supported by accreditation schemes	
How should business accreditation schemes be	By officials	
controlled?	By independent 3rd party auditing	
	By industry	

Questionnaire Completed by	
Contact telephone number (in case of any queries)	

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