

STANDARD OPERATING PROCEDURE (SOP) FOR OFFICIAL CONTROLS BY LOCAL AUTHORITY INSPECTORS ON PRODUCERS AND EXPORTERS OF LIVE CRABS FOR HUMAN CONSUMPTION FOR EXPORT FROM THE UNITED KINGDOM TO THE PEOPLE'S REPUBLIC OF CHINA.

1. PURPOSE: To ensure that official controls are fully demonstrable for:

1.1.Regulatory controls on food business operators (FBOs) involved with the export of live crabs for human consumption to China.

1.2.Verification of voluntary controls implemented by FBOs.

1.3.Verification and oversight that crabs for export from the UK to China are sourced/caught from areas that are agreed by DEFRA to meet the agreed fail/tolerance limit for cadmium for the export of live crabs from the UK to China.

1.4.Export certification of consignments of crabs exported to China.

2. RESPONSIBLE PERSONS: UK Authorised Inspectors who are UK Local Authority Environmental Health Officers / Food Safety Officers carrying out official checks on producers and exporters (if different) of live crabs for export to China.

3. BACKGROUND: Crabs for export to China for human consumption must comply with EU Regulations (EC) 178/2002, 853/2004 and 854/2004. In the UK the EU Regulations are executed and enforced by The Food Safety and Hygiene (England) Regulations 2013 . Parallel Regulations are implemented in Scotland, Northern Ireland and Wales.

Chinese Regulations for crabs for human consumption are as follows:

Code of Hygienic Practice for Fish and Fishery Products Processing Establishment

http://www.seafish.org/media/Publications/Code_of_hygienic_practice_for_fish_and_fishery_products_processing_estab_.pdf

China's Food Safety Law effective 1 October 2015

http://gain.fas.usda.gov/Recent%20GAIN%20Publications/Amended%20Food%20Safety%20Law%20of%20China_Beijing_China%20-%20Peoples%20Republic%20of_5-18-2015.pdf

“National Standard of the People's Republic of China: Code on Quality and Safety Control of Fishery Products for Export”: http://www.seafish.org/media/Publications/Translation-code_of_practice_for_exports_of_fishery_products.pdf

In addition China has specific requirements regarding the maximum level of cadmium in crabs and the Chinese National Food Safety Standard for Maximum Levels of Contaminants in Food GB 2762-2012 states that maximum levels of contaminants are calculated as regards the *usually edible parts of the food unless there are specific provisions*. The Chinese standard states that the maximum (permissible) level (ML) of cadmium in crustaceans is 0.5mg/kg wet weight. This is from the same as the EU standard (Regulation 1881/2006) which states that the maximum level (ML) of cadmium in crustaceans is 0.5mg/kg wet

weight. However, the EU ML is calculated as regards the white meat (muscle) in the appendages. The following Chinese regulations apply:

“Determination of cadmium in foods GB 5009.15-2014”, effective from 28 July 2015”:
http://www.seafish.org/media/Publications/Cadmium_in_Foods_2015_Standard.pdf

“Maximum Levels of Contaminants in Food”:
http://www.seafish.org/media/Publications/China_Max_levels_of_contaminants_in_food.pdf

Procedures for post-import sampling and testing in China of live crabs exported to China are decided by AQSIQ. In the UK procedures for testing all edible parts of crabs for export to China in the UK are set out in DEFRA protocol 7432.

This SOP describes procedures for controls by UK Authorised Inspectors carrying out official checks on producers and exporters (if different) of live crabs for export to China.

4. INSTRUCTIONS/DETAIL:

4.1. ELIGIBILITY OF ESTABLISHMENTS FOR EXPORT

Establishments wishing to export live crabs to China must be listed by China as approved premises. In addition to this, specimen copies of the official stamps of Authorised Inspector (the UK Local Authority Food Safety Officer) carrying out the export certification must be provided to China before exports take place.

The details of the premises and the Authorised Inspector’s stamps to be provided must be submitted on form ET92 to APHA Carlisle or DARD (an electronic version of Form ET92 is available from APHA Carlisle or DARD):

APHA Specialist Service Centre – Exports Eden Bridge House, Lowther Street, Carlisle, Cumbria - CA3 8DX. Tel. 03000 200301. E-mail: LiveAnimalExports@APHA.gsi.gov.uk

Fisheries Division, Department of Agriculture and Rural Development, Room 410, Dundonald House, Upper Newtownards Road. BELFAST BT4 3SB. Tel: 02 890 765 323. Email: greg.griffiths@dardni.gov.uk

It is the responsibility of the exporter to ensure that the completed form has been sent to APHA/DARD. APHA and DARD will send the information on to DEFRA in London for onward transmission to be registered by the central authority (AQSIQ) in China. Defra will submit new information or revisions to existing information on a quarterly basis.

The list maintained in China is based on information provided to China by DEFRA. The exporter should ask their importer in China to check with the local CIQ office to ensure that the relevant details have been received. It is the responsibility of the exporter to ensure that this has occurred before exports take place.

Authorised Inspectors and exporters must note that exports may be at risk if exports commence before China has registered the details of the exporter and the specimen stamps.

Establishments wishing to be approved for export to China must be in full compliance with EU hygiene rules. Establishments which are not in compliance must not export. It is the

responsibility of the producer, exporter and Authorised Inspector to check on this, and it is the responsibility of the Authorised Inspector to refuse to provide export certification if necessary.

Establishments wishing to be approved for export to China must also be in full compliance with Chinese hygiene regulations. Establishments which are not in compliance with Chinese regulations must not export. It is the particular responsibility of the producer to check on this, and it is the responsibility of the Authorised Inspector to ensure that the producer is aware of this requirement. In addition in respect to the level of cadmium in the crabs, the producer and exporter must ensure that the crabs are sourced from catch areas that do not exceed the agreed fail/tolerance limit by DEFRA (see paragraph 4.2.4.).

The inspection of the products for export is at the discretion of the Authorised Inspector based on objective evidence, and where appropriate, the policies and procedures of the Local Food Authority. See the paragraphs below for detailed guidance on documentary, identity and physical checks.

An audit trail, including information providing the basis for certification, must be kept by the Authorised Inspector in case discrepancies with any consignment are subsequently identified and, also, in case audits are required. See the paragraphs below on certification procedure for further guidance.

The Authorised Inspector must exercise reasonable precautions and due diligence when relying on information provided by the exporter or other third parties to ensure that the information is correct and that certification can be carried out.

4.2. CERTIFICATION PROCEDURE BY AN AUTHORISED INSPECTOR

Checks before export certification can be considered:

Before certification is provided at all, a check must be carried out at the production premises to ensure full compliance with EU and Chinese food safety requirements. Further details of the requirements are set out in this SOP. Once exports have commenced, a visit for these purposes is not necessary if such checks have already been made recently and if the Authorised Inspector has no reason to consider that there has been a significant change since then. It is for the Authorised Inspector to decide if, depending on the timing of the last inspection, an additional inspection is required. For certification at a place other than the place of production, the Authorised Inspector may wish to obtain confirmation of compliance from the appropriate Authority in any format agreed between the two parties.

4.2.1. CERTIFICATION:

7432EHC must be signed by an Authorised Inspector. See also, paragraph 4 relating to the provision of specimen stamps to China.

Completion of export health certificate 7432EHC can be carried out at the place of production or at another place, such as at the airport/port of export from the UK.

If export certification is provided at a place remote from the production plant (such as an airport or port), it is the responsibility of the exporter to liaise, well in advance, with the certifying Authorised Inspector(s) to:

- a) inform the Authorised Inspectors of the need for such certification and the expected timings;

and

- b) ensure that all necessary documentation and supporting certification is provided for the Authorised Inspectors

Certification is based on satisfaction of the Authorised Inspector that:

- The product meets the conditions of the Health Attestation in Part IV of the Export Health Certificate (See Section 4.2.3 of this SOP)
- For exports of live crab to China, the crabs must have been caught/sourced from areas that do not exceed the agreed fail/tolerance limit for cadmium (see paragraph 4.2.4 of this SOP).
- Any supporting evidence is correct, accurate, and pertains to the product intended for export
- There are no apparent discrepancies between the consignment and the documentation accompanying it (not limited to the requirements of the Export Health Certificate)

A number of checks will be relevant to satisfy the Authorised Inspector of the points above. When exporters have demonstrated consistent compliance with the export requirements, including traceability including the catch area, product labelling and identification, and consistency between consignments and documentation, Authorised Inspectors may use their professional judgement to decide on the need for specific checks if they do not have reasons to consider that they are necessary.

Before issuing 7432EHC to a particular company for the first time, in all cases, an additional full audit must be carried on the company's traceability systems. If significant concerns are noted, 7432EHC must not be issued. Subsequent audits must be carried out based on the judgement of the Official Inspector.

When carrying out documentary checks, the documents with the consignment must be checked to ensure that the details of the premises of origin are correct, that those premises are EU approved, and that the documented nature of the product is consistent with the consignment. The documents must contain details of EU approval of the plant, species of the product, exporter and importer details, number of pieces and weights of the live crabs being exported and provide means to correlate them to the consignment. The Authorised Inspector will also need to check on the origin of the products (i.e. the area(s) of

catching/sourcing). The packaging must be new (or clean, if re-usable), in good condition, and not broken or visibly contaminated.

Broken packages are not acceptable and must trigger a thorough inspection, if observed.

When checks, specific for export purposes or otherwise, raise concerns that export requirements are not consistently met, Authorised Inspectors must refuse further certification until deficiencies are rectified, or require additional checks and/or inspections to be completed, until they are satisfied that they are no longer required. If documentary, identity or physical checks suggest inconsistencies between the information provided and the products for export, the Authorised Inspector must inform the APHA Specialist Service Centre for Exports at Carlisle or DARD.

CERTIFICATION AT THE PLACE OF PRODUCTION OR ELSEWHERE

If certification is provided at the place of production, this paragraph can be certified from personal knowledge or by reference to certified information provided by another Authorised Inspector for the premises of origin.

If certification is to be provided at a place (such as an airport) remote from the place of production, the exporter will need to liaise, well in advance, with the local Environmental Health Office for the place of production and the certifying Authorised Inspector at the place of certification, to inform the certifying Authorised Inspector of the need for such certification, the expected timings, and to ensure that all necessary contact information and required documentation is provided by the exporter (and, if required by the certifying Official Inspector, any documentation from the local Environmental Health Office for the plant).

It is the exporter's responsibility to ensure that communication with the certifying Authorised Inspector occurs. If this does not take place, it is likely that the export may be delayed and the consignment may then not be exported.

PRODUCTION MODE AND CATCH AREA

Table II of 7432EHC refers: For each consignment of crabs, the exporter must declare that the product were wild caught and the area of catch must be given. **Note that in the UK all crabs are wild caught and are NOT aquacultured or farmed.**

The Food and Agriculture Organisation (FAO) area, the International Council for the Exploration of the Sea (ICES) catch area and the rectangle / sub-area code must be inserted using the format of the following example:

FAO27, ICES area VIIe, Rectangle 28E6

For the export of live crabs, only areas that meet the agreed fail/tolerance limit for cadmium can be used - see also paragraph 4.2.4.

'Not applicable' boxes must be left blank.

4.2.2. LABELLING

The packaging / containers must be marked with the EC approval number for the production plant. The packaging / containers must be marked with the country of origin, if not already included in the establishment stamp.

Labelling must be present in line with China's requirements: *The following notes are adapted from the Chinese Regulations on Inspection and Quarantine of Entry and Exit Aquatic Products* but note: DEFRA does not guarantee the accuracy of this translation – see:

http://jckspaqj.aqsiq.gov.cn/dwyxspjy/jblggjglbf/200903/t20090312_108517.htm)

The products shall have on their internal and external packaging, clear and distinguishable Chinese and English marks, which shall indicate the following matters:

- Commodity name and formal (Latin) name, specification (i.e. quantities), date of production, batch number and preservation conditions of the aquatic products;

(DEFRA comment regarding 'preservation': If the products are at ambient temperature and without any other means of preservation, there is no need to record this. If the products are chilled, record this as such - the FBO should provide a statement or record of using ice – eg XX crabs packed with ice in YY insulated boxes.)

- Production method, including: sea fishing, freshwater fishing and farming;

(DEFRA comment regarding 'production method': If the products are

- wild caught use the words 'sea fishing' or 'freshwater fishing'.
- If the products are farmed or aquacultured use the word 'farming' but note that in the UK crabs are all wild caught and are not farmed).

- Producing area, including: fishing sea areas of the live aquatic animals or country or region where the freshwater live aquatic animals are caught or produced, and the country or region where the last breeding phase of bred products is located;

(DEFRA comment regarding 'producing area' - see above.).

- Names and registration numbers of the production farms/establishment

(DEFRA comment regarding 'production farms/ establishments': Include only details of the actual production / exporting plant. Note again that in the UK crabs are all wild caught and are not farmed).

- People's Republic of China must be indicated as the destination.

Regarding Chinese text/characters on labels/packaging: The Authorised Inspector must note that it is the responsibility of the producer/exporter to ensure that the Chinese

text/characters on the label/packaging are a correct translation of the English text/characters, even if the Authorised Inspector is able to read and understand the meaning of the Chinese text/characters.

4.2.3. HEALTH INFORMATION

IN SUMMARY paragraph IV of 7432EHC can be signed on the basis of compliance with EU Regulations (EC) 853/2004 and 854/2004 and the following Chinese Regulations:

Code of Hygienic Practice for Fish and Fishery Products Processing Establishment

http://www.seafish.org/media/Publications/Code_of_hygienic_practice_for_fish_and_fishery_products_processing_estab_.pdf

China's Food Safety Law effective 1 October 2015

http://gain.fas.usda.gov/Recent%20GAIN%20Publications/Amended%20Food%20Safety%20Law%20of%20China_Beijing_China%20-%20Peoples%20Republic%20of_5-18-2015.pdf

“Determination of cadmium in foods GB 5009.15-2014”, effective from 28 July 2015”:
http://www.seafish.org/media/Publications/Cadmium_in_Foods_2015_Standard.pdf

“Maximum Levels of Contaminants in Food”:
http://www.seafish.org/media/Publications/China_Max_levels_of_contaminants_in_food.pdf

“National Standard of the People's Republic of China: Code on Quality and Safety Control of Fishery Products for Export”:
http://www.seafish.org/media/Publications/Translation-code_of_practice_for_exports_of_fishery_products.pdf

In the UK, the EU Regulations are implemented by the The Food Safety and Hygiene (England) Regulations 2013 and parallel Regulations in Scotland, Northern Ireland and Wales. Compliance with the EU and Food Hygiene Regulations can be accepted, provided the EC identification mark is present on the packaging of the products. Accordingly, the Authorised Inspector can certify this on the basis that the premises have approved status, combined with personal knowledge of the plant, and/or by reference to records provided by the plant operator and on the basis of the presence of the EC Identification Mark.

Compliance with the Chinese Regulations can be based on the fact that the producer and exporter are aware of the Chinese regulations and that they have an SOP which clearly identifies the specific regulations that have been complied with.

Specifically as regards the export of live crabs for export to China, the Authorised Inspector must check that there is no possible risk of cadmium contamination from the exporters' place of storage and the packaging used for export.

Authorised Inspectors must carry out inspections and checks as necessary of procedures and records based on a risk-assessment of the FBO involved . This should be based on the relevant legislation, the Framework Agreement and in accordance with the Food Law Codes

of Practice and any centrally issued guidance. However a detailed inspection of procedures and records must be carried out at least once every year for the export of live crabs to China. The FBO must make arrangements to facilitate this.

Local Authority checks must include inspection of all procedures and records relating to the collecting, storing, processing, selecting, transport, hygiene, residue and microbiological testing and certification of crabs for export to China.

Non-compliance with procedures for export to China must be reported by the Authorised Inspector to the Local Authority if different and to FSA/FSS and DEFRA and the relevant Devolved Administration.

If the export certification is carried out at a place which is remote from the production plant, the certifying Authorised Inspector can certify paragraph IV on the basis of the presence of the EC identification mark and on the basis of a signed declaration by the UK Food Safety Officer for the premises of origin.

USE OF PROHIBITED DRUGS:

The first sentence of paragraph IV(1) refers: As the crabs are wild caught, this can be certified on the basis that there is no possibility of the use of any drugs.

RESIDUES OF HEAVY METALS:

The second sentence of Paragraph IV(1) refers: In respect of certifying that no residues of heavy metals exceeding the limits in Chinese and European Regulations have been detected, firstly the Authorised Inspector should note that for these purposes the Chinese and European standards have been accepted as equivalent except that the maximum levels of certain metals are different. In this respect producers and Authorised Inspectors should note that with regards to sampling for chemical contaminants in live fishery products, the overriding position of the FSA is that the food business operator has the responsibility for ensuring that checks are made to ensure contamination does not exceed the levels laid out in Regulation (EC) 1881/2006, **and** as necessary, with additional sampling requirements for products being exported to Third Countries such as China.

Producers and Authorised Inspectors should note that with regards to levels of heavy metals, it is the responsibility of the producer to carry out routine surveillance and for the Authorised Inspector to check that this is done.

If food business operators do their own end product testing they should inform local authorities when permitted levels are exceeded. If monitoring is carried out by local authorities and the 1881/2006 levels are exceeded, the local authority should inform the FSA and appropriate follow up action taken. Regulation (EC) 1881/2006 (setting maximum levels for certain contaminants in foodstuffs), sets limits for heavy metals (and other substances such as dioxins and PCBs, polycyclic aromatic hydrocarbons (PAH)) in animals including crustaceans. The heavy metals listed are lead, mercury, cadmium and tin. The products must also comply with Council Directive 96/23/EC, which is implemented in the UK by the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 1997, and a programme referred to as the National Surveillance Scheme (NSS).

If testing under the NSS carried out by the FSA in E/W/S/NI detects residues of heavy metals (including arsenic) in products supplied for human consumption, this would be traced back and further investigations would then be done. This would include residues detected as the result of monitoring programmes carried out in live fishery products. Such surveys by FSA may be targeted following data from the monitoring of shellfish waters by the Environment Agencies under Directive 2006/113/EC of the European Parliament and of the Council of 12 December 2006 on the quality required of shellfish waters.

4.2.4. SPECIFIC CONTROLS FOR CADMIUM IN CRABS – TESTING FOR CADMIUM AND AREAS THAT DO NOT EXCEED THE AGREED FAIL/TOLERANCE LIMIT FOR SOURCING/CATCHING CRABS WITH RESPECT TO LEVELS OF CADMIUM

As from January 2016, until agreed otherwise with China, the following controls on testing and source/catch areas will be implemented on live crabs to comply with China's requirements regarding the level of cadmium in live crabs exported from the UK to China for human consumption.

TESTING FOR CADMIUM AND OFFICIAL CONTROL OF THAT TESTING AND AREA SURVEILLANCE

FBOs are responsible for collecting crabs for sampling and testing and sending them to the laboratory as described in DEFRA Protocol number 7432 on the export of live brown crabs (*Cancer pagarus*) from the UK to China. Costs of sampling and testing must be paid for by FBOs.

FBOs that are members of the Shellfish Association of Great Britain (SAGB) should provide access to historical sampling data demonstrating that the crabs are from the approved fishery areas. If not, FBOs must ensure that crabs are taken for sampling and testing regularly and on average once every month from all the fishery areas used. The frequency of sampling and testing will be reviewed by DEFRA.

FBOs must collect and maintain records of all sampling and testing for cadmium that they do whether this is official or unofficial and whether routine or otherwise. Records must be readily available for inspection at any reasonable time by the Local Authority, FSA/FSS/DEFRA or the relevant Devolved Administration. Records can be paper-based or electronic but a backup must be kept. Records must be kept for at least 6 (six) years.

SAGB will monitor and control sampling and testing of crabs by individual FBOs and make results of sampling and testing available to the FBOs and LAs involved and to DEFRA, the Devolved Administrations and FSA and FSS.

CEFAS is responsible for carrying out sampling of tissues and testing for cadmium and sending reports to the submitting FBO and SAGB.

SAGB will monitor and control sampling and testing of crabs by individual FBOs and inform relevant DEFRA, FSA/FSS Devolved Administrations as needed and the relevant Local Authorities of all monitoring.

CEFAS is responsible for carrying out sampling of tissues and testing for cadmium and sending reports to the relevant FBO and DEFRA.

Authorised Inspectors must check records of area testing for cadmium before consignments of crabs are certified for export to China. These checks can be carried out on a rolling basis providing the Inspector has full awareness of the testing carried out and of any changes but the Inspector must record that checks are done and are current.

If DEFRA confirms that testing has shown that cadmium results in crabs from the catch area do not meet the Chinese requirement and which exceed the agreed fail/tolerance limit for cadmium, then APHA/DARD will inform exporters and LAs involved that these catch areas cannot be used. **In this event LA Authorised Inspectors must not issue export health certificates for these areas until DEFRA has confirmed that the required level of compliance has been achieved and APHA/DARD has informed exporters and LAs that these areas can be used again.**

DEFRA is responsible for informing AQSIQ of surveillance testing for cadmium and of non-compliances from areas which exceed the agreed fail/tolerance limit for cadmium and actions taken. DEFRA is responsible for informing AQSIQ if exports from a certain area are being resumed.

It is important to note that all results of routine monitoring and surveillance and exceedance relate to a fishery area and not just to one exporter.

FBOs and Authorised Inspectors should note that the private testing described above is in addition to surveillance carried out under the National Surveillance Scheme (NSS) which implements the requirements of Council Directive 96/23/EC, which is implemented in the UK by the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 1997. Under the NSS, risk-based surveillance is carried out for cadmium in crabs but in accordance with EC Regulation (EC) 1881/2006, only white meat from the appendages is tested. FSA/FSS decide on routine official testing for substances such as cadmium in crabs and other food products as required under EU rules. The testing that is carried out is decided on the basis of a risk assessment.

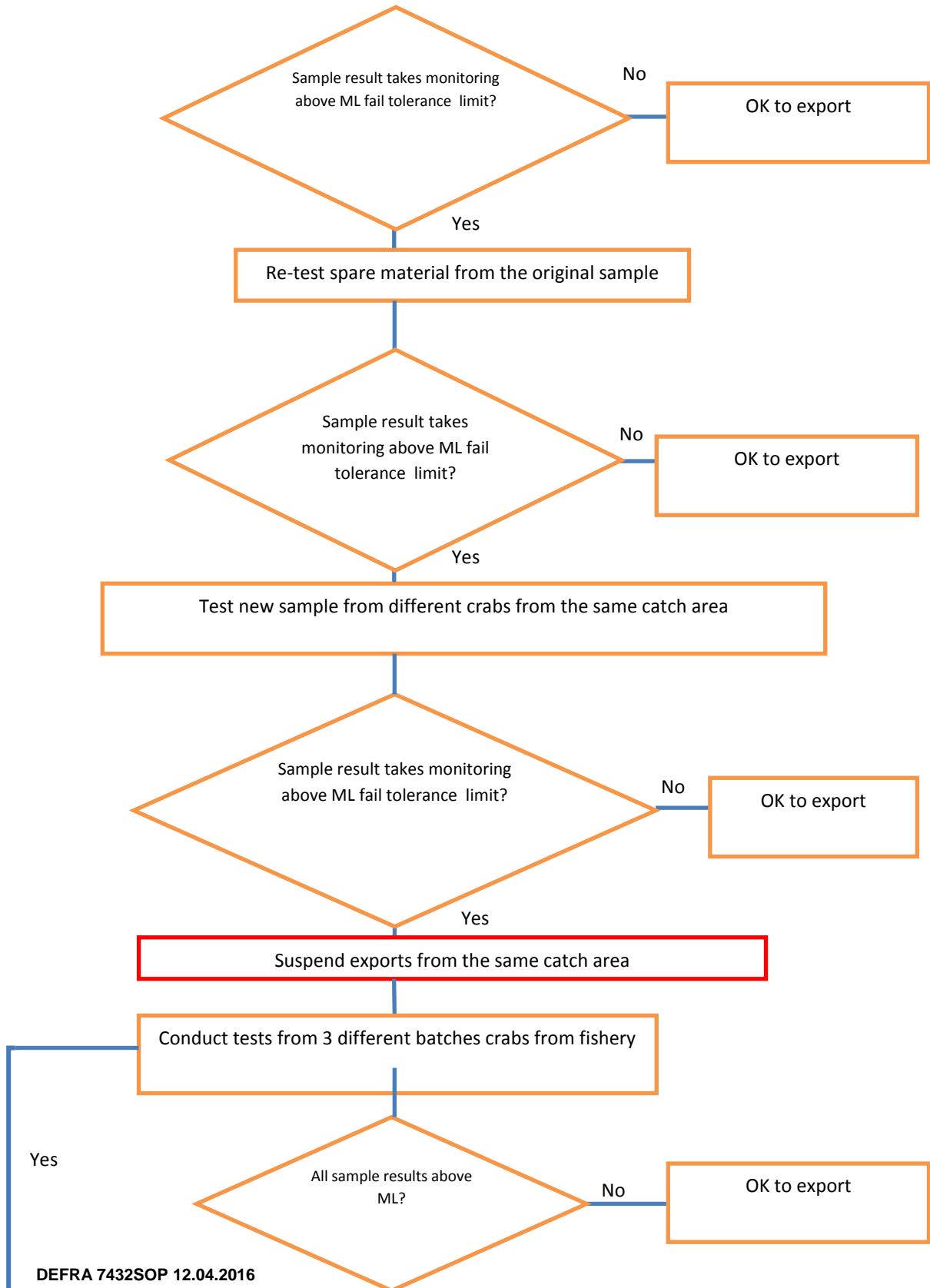
ACTION WHEN TEST RESULTS EXCEED THE MAXIMUM LEVEL OF 0.5MG/KG WET WEIGHT

Results of routine monitoring and surveillance and exceedance relate to a fishery area and not just to one exporter.

CEFAS is responsible for carrying out official sampling of tissues and testing for cadmium and sending reports to the relevant FBO and the DEFRA.

If cadmium results above the maximum level of 0.5mg/kg occur, the procedure set out in the flow chart below will be followed:

PROCEDURES FOR DEALING WITH CADMIUM TEST RESULTS ABOVE THE MAXIMUM LEVEL OF 0.5MG/KG WET WEIGHT FROM CRABS FROM A SPECIFIC CATCH AREA



See above for procedures to be adopted if cadmium results exceeding the fail/tolerance limit are confirmed by DEFRA.

DEFRA is responsible for informing AQSIQ of surveillance testing and non-compliances in respect of the failure tolerance limit and actions taken and if exports are being resumed.

ACTIONS TO ENSURE THAT THE BACKGROUND LEVEL OF CADMIUM IN CRABS FROM THE CATCH AREAS USED FOR EXPORT OF CRABS TO CHINA DO NOT EXCEED THE FAIL/TOLERANCE LIMIT

DEFRA decides which catch areas do not exceed the fail/tolerance limit for cadmium and can be used for export of crabs to CHINA

The decision for each area is based on for example information on environmental monitoring in fishery areas provided in OSPAR¹ reports and results of testing carried out in the UK and in China. This decision making process will be reviewed as further information becomes available.

FBOs must ensure that crabs for export to China are not caught from areas that exceed the fail/tolerance limit and must provide information to their Authorised Inspector when checks are made and when consignments are certified for export to China.

DEFRA will keep records of these areas and catches and provide reports every three months to FSA/FSS and the Devolved Administrations and the Local Authorities involved.

If Authorised Inspectors identify that crabs are sourced from areas that exceed the fail/tolerance limit those crabs must not be certified for export to China. In addition the Authorised Inspector must inform FSA/FSS, DEFRA, and the Devolved Administration(s) involved.

If crabs from areas that exceed the agreed fail/tolerance limit for cadmium are exported to China, DEFRA will inform AQSIQ.

ABSENCE OF PATHOGENIC BACTERIA:

Paragraph IV(2) refers: The EU has specific microbiological criteria for food products – Regulation (EC) No 2073/2005 on the microbiological criteria for foodstuffs refers. This Regulation is implemented in the UK by The Food Safety and Hygiene (England) Regulations 2013 . Parallel Regulations are implemented in Scotland, Northern Ireland and Wales. In respect of certifying the absence of pathogenic bacteria, the Authorised Inspector can certify this on the basis that the premises have approved status, combined with personal knowledge of the plant, and/or by reference to records provided by the plant operator and on the basis of the presence of the EC Identification Mark.

In addition, the presence of an established HACCP plan with evidence of implementation of that plan will provide appropriate evidence of a microbiological testing programme appropriate for the product concerned and as required under the EU Hygiene regulations. A

¹ OSPAR: <http://www.ospar.org/>

HACCP plan must be present at the processing premises and satisfactory results must have been maintained. If satisfactory results have not been maintained, it is the responsibility of the producer/exporter to cease exporting, until satisfactory results have again been achieved. The Authorised Inspector must not issue certification until satisfactory results have been achieved again.

4.2.5. MONITORING AND SUPERVISION OF THE AQUACULTURE AREA AND FREEDOM FROM OIE LISTED DISEASES:

Paragraph IV (3)(i) refers:

The Authorised Inspector should note that in the UK crabs are all wild caught and are not farmed and the wording in paragraph IV (3)(i) regarding a relevant aquaculture area is relevant to other products.

However, for the export of crabs and completion of this certificate, the Authorised Inspector may certify the first sentence of paragraph IV.3(i) regarding supervision and monitoring of the relevant catch area on the basis that the aquatic environment in the UK is supervised and monitored according to OIE standards by CEFAS in England and Wales, Scottish Government in Scotland and AFBI/DARD in Northern Ireland.

The Authorised Inspector may certify the second sentence of paragraph IV.3(i) regarding the absence of an outbreak report of OIE listed diseases (ie OIE listed diseases of aquatic animals, excluding bivalve molluscs) listed below (this list is from: <http://www.oie.int/international-standard-setting/aquatic-manual/access-online/>) by checking the appropriate website of CEFAS, SG or AFBI/DARD for the absence of current records of the relevant diseases in the relevant catch area(s).

Authorised Inspectors should note that country clearance for absence of disease is not required and that freedom from relevant diseases can be certified providing that the OIE listed diseases relevant to the types of animals for export are not recorded as present in the area in which the crabs were caught.

The Authorised Inspector should record the date and time that the relevant web-site(s) was accessed in case this needs to be checked in the event of an audit or if problems occur.

Diseases of crustaceans	
Disease	OIE chapter
Infectious hypodermal and haematopoietic necrosis	Chapter 2.2.2
Infectious myonecrosis	Chapter 2.2.3
Taura syndrome	Chapter 2.2.4
White spot disease	Chapter 2.2.5
White tail disease	Chapter 2.2.6
Yellowhead disease	Chapter 2.2.7

See the following web sites for reports of disease (these are updated if an outbreak of disease occurs):

CEFAS in England and Wales: <http://www.DEFRA.gov.uk/aahm/disease/>

Scottish Government in Scotland:

<http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/FHI/monitoring/designatedareas>

DARD in Northern Ireland: http://www.dardni.gov.uk/index/fisheries-farming-and-food/marine_fisheries/aquaculture/fish-health/n.i._disease_status

FREEDOM FROM ANIMAL DISEASES AND PARASITES:

Paragraph IV(3)(ii) refers. This paragraph referring to animal diseases or parasitic diseases can be signed on the basis of the absence of clinical signs and compliance with the applicable requirements in EU law relating to aquatic animal health. If the producer or Authorised Inspector are aware that an outbreak of disease which is caused by a zoonotic pathogen has occurred in the aquatic animals for export, exports to China must not be allowed until the outbreak has been resolved and clearance has been given by the Food Standards Agency.

Veterinary and sanitary requirements under EU 853/2004 regulations and fitness for human consumption:

Paragraph IV(4) refers: This paragraph can be certified on the basis of the presence of the EU identification mark and evidence of compliance with Chinese Regulations as set out above.

5. MONITORING & VERIFICATION, RECORD KEEPING:

The Local Authority Authorised Inspector must keep records of checks and controls applied to FBOs and provide these for inspection by FSA/FSS, DEFRA, APHA and DAs as necessary. Records must be kept for at least 6 (six) years.

6. CORRECTIVE ACTION:

Non-compliance with this SOP must be reported to FSA/FSS, DEFRA, APHA and DAs as appropriate who will consider further action as appropriate. Further export health certificates for export to China must not be completed until the necessary corrective action has been completed.

7. FOR COMPLETION BY THE LEAD FOOD SAFETY OFFICER FOR THE LOCAL AUTHORITY

DATE SOP IMPLEMENTED:		
DATE	NAME	SIGNED

DATE SOP REVIEWED:		
DATE	NAME	SIGNED

DATE SOP REVISED:		
DATE	NAME	SIGNED