

ANNEX

Response of the Competent Authorities of Ghana to the recommendations of Report ref. DG(SANCO)/2013-6707-MR of an audit carried out from 26 February to 05 March 2013 in order to evaluate the control systems in place governing the production of fishery products intended for export to the European Union

N°.	Recommendation	Action Proposed by the Competent Authority
1	The CA should ensure that all facilities placed on the EU list have a valid approval which provides the guarantees required by point 2(a) of Article 12 of Regulation (EC) No 854/2004.	<p>From 2013, approval/ renewal inspections for all EU listed establishments and vessels would be conducted before the end of the year, Renewal letters would be issued to all the Food Business Operators by 31st December 2013 to ensure that each establishment and vessel will have a valid approval providing guarantees required by point 2(a) of Article 12 of Regulation (EC) No 854/2004.</p> <p>Letters would be issued to all food business operators by 30th September 2013 to make their facilities especially vessels available for the renewal inspections to facilitate the process.</p> <p>This information was communicated to the FBOs at a meeting held on 2013-03-14 to discuss the outcome of the FVO audit.</p>
2	The CA should ensure that official controls on the primary production vessels consisting of inspections at regular intervals, as defined in point 1 of Chapter I of Annex III to Regulation (EC) No 854/2004, are carried out in order to provide the guarantees required by point II.1 of the export Health Certificate defined in Regulation (EC) No 2074/2005.	<p>All establishments receiving fresh fish from artisanal vessel have been informed to make these vessels available to the CA for inspection. A list of these vessels has been drawn up to enable the CA monitor and inspect the vessels according a schedule.</p>
3	The CA should ensure that official controls on the landing of fishery products consisting of regular checks on the hygiene conditions of landing, as defined in point 1 of Chapter I of Annex III to Regulation (EC) No 854/2004, are carried out in order to	<p>Communication between the CA and the Ghana Ports and Harbours Authority has been established to ensure that both agencies are involved in the monitoring and verification of compliance of the landing sites. Efforts are being made to involve other governmental agencies such as</p>

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	provide the guarantees required in point II.1 of the export Health Certificate defined in Regulation (EC) No 2074/2005.	the Fisheries Commission in the inspection of the landing sites. SEE ANNEX 1
4	The CA should ensure that all facilities placed on the EU list have been approved only if they comply with requirements at least equivalent to the applicable ones referred to in Section VIII of Annex III to Regulation (EC) No 853/2004, in Article 5 and Annex II to Regulation (EC) No 852/2004 and maintain compliance with those requirements, in order to be able to provide the guarantees required in point II.1 of the export Health Certificate defined in Regulation (EC) No 2074/2005.	<p>The Fishery Products Regulation is in the process of being amended to include the following requirements;</p> <ul style="list-style-type: none"> • Requirements for procedures based on HACCP principles for freezer vessels to be equivalent to Article 5 Regulation (EC) No 852/2004 • Update of the relevant families of fish susceptible to histamine formation to be equivalent to those mentioned in Regulation (EC) No 2073/2005 <p>SEE ANNEX 2</p> <p>All establishments and vessels are to be re-assessed using a revised checklist to include all the requirements of the relevant Regulations SEE ANNEX 3</p> <p>All HACCP and Best Practices manuals of listed facilities and their implementation are also to be re-assessed</p>
5	The CA should ensure that imported raw material for producing fishery products for EU export are EU eligible in order to be in a position to provide the guarantees required in point II.1 of the export Health Certificate defined in Regulation (EC) No 2074/2005.	All fishery products, imported as raw material from either a third country or vessel will be accepted s raw material for export to the EU if the facility from which they were exported comply with the requirements of the EU and are also on that country's approved list.

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		Communication with the competent Authority of the country of origin of the fish will be established to ensure that fish imported from vessels meet relevant requirements.
6	The CA should ensure the reliability of the health certification of fishery products for EU export (considering the requirements of Directive 96/93/EC, Regulation (EC) No 854/2004, and Regulation (EC) No 2074/2005).	Checks and control measures have been put in place to ensure that all information provided on health certificates issued have been duly verified by the certifying officer. To achieve this the following have been done: <ul style="list-style-type: none"> • The consignment inspection forms have been re-designed to include the following <ul style="list-style-type: none"> a. Traceability information including batch numbers • Catch certificates (to authenticate the source of the fish) and bill of lading must be provided by the FBO and verified by the CA. • A data base has been installed to help monitor own checks conducted by Food Business Operators to ensure that they are being conducted according to schedule.
7	The CA should ensure that only the model of certificate defined in Regulation (EC) No 2074/2005 is used for EU export certification.	Due diligence has been done to ensure that all health certificates issued are those defined in Regulation (EC) No 2074/2005. Contact has been made with TRACES team of the EU to enable GSA to start using TRACES in the issuance of health certificates SEE ANNEX 4
8	The CA should ensure that laboratories performing official control analyses use EU reference methods (or alternative	The Microbiology and the Metallic contaminants (Heavy Metals) Laboratories are accredited to the requirements of ISO 17025.

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	<p>methods validated to the EU reference ones), have performance criteria for the methods used in line with EU rules, are assessed and that adequate quality controls are in place to provide for the reliability of test results (Codex Alimentarius, CAC/GL 26-1997), in particular for water testing for microbiology and fishery products testing for histamine and heavy metals.</p>	<p>Microbiology Laboratory uses ISO methods (SEE ATTACHED ANNEX 5) for testing of water whilst the Metallic Contaminants Laboratory uses EU Methods (BS EN 14084: 2003 and BS EN 13806: 2002).</p> <p>In addition these laboratories have participated in Proficiency Testing Schemes with FAPAS. Methods used by both laboratories for certified reference material from FAPAS also compare favourably with the stated values.</p> <p>We have also participated in Proficiency Testing Scheme for the analysis of histamine in fish and our results compare favourably with other results from FAPAS. Presently our histamine Laboratory is preparing for accreditation to ISO 17025. Documentation and trial audits have taken place. EU methods for histamine analysis would undergo the necessary verification for our Histamine Laboratory accreditation.</p>
9	<p>The CA should ensure that they, and the food business operators, have timely access to laboratory results of official control analyses in order to take timely and appropriate measures in order to be able to provide the guarantees required in point II.1 of the export Health Certificate defined in Regulation (EC) No 2074/2005.</p>	<p>Samples from the CA and other Food Business Operators would be highly prioritized for analysis. Business operating hours would also be extended to ensure timely delivery of service. In the event of unforeseen and genuine operational challenges where deadlines cannot be met, samples would be sub-contracted to accredited laboratories which have been certified by the CA for the timely delivery of services.</p>