# Assessment report for Dominican Republic

Dates of visit; 24 - 28 June 2015

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# Official agencies

To gather information regarding official control related to SPS measures in Dominican Republic (DR) one consultation was arranged with staff from official agencies working in this area and another consultation with staff working in academia on aquaculture research.

## Consultation held June 25th 2015 at Ministry of Agriculture in the Dominican Republic

In addition to the experts from the mission team this consultation was attended by representatives from Consejo Dominicano de Pesca y Acuicultura (CODOPESCA), Office of Agricultural Trade Agreements (OTCA is the Spanish acronym) and Committee on Sanitary and Phytosanitary Measures; please refer to Appendix for the complete lists of attendants. The consultation focused on developing an understanding of the roles and responsibilities of the various agencies/departments in the area of health and food safety in the fisheries and aquaculture sectors in Dominican Republic (DR).

The Team was advised that the present legislation on fisheries products concerns the protection of the resources along the fisheries products production chain and it does not include requirements concerning public health issues as is required by EC. New legislation related to food safety issues is in progress in the DR and this will also deal with SPS requirements in fisheries products.

It was clarified that the CA in charge for official controls on fisheries products (wild and aquaculture) in the DR is the Consejo Dominicano de Pesca y Acuicultura (CODOPESCA) under the Ministry of Agriculture (MoA). The main task of this CODOPESCA is to deal with the protection of marine resources and a sustainable development of fishing activities. However, the legal act that created CODOPESCA does not include tasks related to SPS measures e.g. concerning hygiene and food safety of fisheries products. Hence, the staff from the CA does not have the legal power to carry out inspections at processing establishments, vessels, landing sites and commercial aquaculture sites in order to control and enforce SPS requirements. Therefore, CODOPESCA has to collaborate with different governmental agencies regarding SPS requirements in the entire production chain for fisheries products and there is a lot of overlap between agencies in DR. For example CODOPESCA collaborates with the Animal Health Department and the Food Safety department under the Ministry of Agriculture as well as Secreteria de Estado de Salud Publica y Asistencia Social (SESPAS) under the Ministry of Health regarding SPS requirements and public health issues in the production chain for fisheries products. Presently no written Memoranda of Understanding (MoU’s) are in place regarding these collaborations, although there are some existing MoU’s between these agencies for Agriculture products and there is interest in preparing similar documents regarding fisheries products in the future. The Team learned that SESPAS has competence in the hygiene of food in general in DR.

Written procedures concerning official controls on fisheries products are presently not in place. Furthermore, have inspection reports and forms regarding SPS requirements and public health aspects of official control not yet been adopted.

The Team learned that very complicated procedures exists e.g. regarding issuing export and health certificates for fisheries products and who is responsible for what tasks. The procedures applied depend for example on the requirement of the different export countries. Consequently, the current procedures are even difficult to comprehend for the staff within the relevant agencies in DR and no explanation outlines, such as simple schematic diagrams, seem to be available. Further, the Team was informed that bureaucracy is very complicated in DR, because people tend to try to misuse the system. Consequently, there is considerable mistrust towards fisheries products from DR which also makes it difficult to export them.

The Team was informed that the Central Veterinary Laboratory (CVL) which is part Livestock Directorate General of the Secretariat of State for Agriculture (Secretaria de Estado de Agricultura, Direccion General de Ganaderia) is the main laboratory for analysis of food and water in Santo Domingo. The CVL carries out some official analysis on microbiology and heavy metals in the framework of the official controls of fisheries products. However, official monitoring of chemical risks (histamine, Polycyclic Aromatic Hydrocarbons (PAHs), dioxins and Polychlorinated Biphenyls (PCBs)) are not carried out. Likewise, a National Program for monitoring of residues of environmental contaminants in products from wild fisheries is currently not in place. Furthermore, no water monitoring analysis on toxin producing dinoflagellates is currently carried out and limited scientific data is available concerning the safety of marine reef associated fish species.

The CVL has some analytical test ISO 17025 accredited e.g. microbiological and heavy metals analysis. However, not all these analysis are currently accredited for fisheries products, but have been accredited for other matrixes and thus there is a potential for getting them accredited for fisheries products as well.

## Consultation held June 25th 2015 at Visita al Instituto Superior de Agricultura (ISA),

This consultation was held at ISA aquaculture facilities in Santiago in DR and the aim of the consultation was to receive information from representatives of ISA regarding their role and responsibilities related to health and food safety in the aquaculture sector; please refer to Appendix for the complete lists of attendants.

The Team learned the ISA aquaculture facility in Santiago was solely an aquaculture research station under the University of Santiago and not a commercial aquaculture site. ISA collaborates closely with Instituto Dominicano de Investigaciones Agropecuarias y Forestales (IDIAF). The main emphasis of ISA activities in Santiago is on transfer of knowledge to e.g. people that want to build Aqua-ponds e.g. framers, fishermen, technicians in aquaculture. The ISA staff is also involved in education of BSc students as well as research & development related to aquaculture and food science. Consequently, the ISA staff has no official role and responsibilities related to health and food safety in the aquaculture sector.

The Team was informed there is no system in place for the registration of aquaculture farms, but an Environmental impact assessment (EIA) is carried out before aquaculture license (issued by CODOPESCA) is given to aquaculture farms.

The team was advised that a National Program for monitoring of residues of veterinary medicines and environmental contaminants in products from aquaculture has not been implemented in DR.

# Sites visited in the Dominican Republic

To assess enforcement procedures site visits were carried out according to the table below.

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| --- | --- |
| **Type** | **Number**  **of visits** |
| Landing sites | 2 |
| Fishing/freezer vessels | 0 |
| Processing establishment | 0 |
| Laboratory | 0 |
| Retail/Supermarket | 1 |

The Team made direct observations regarding the infrastructure, vessels, tool/equipment and made further enquiries to stakeholders at the sites visited about harvest and post-harvest procedures.

## Landing sites and vessels

Please refer to the section *SPS requirements for fish and aquaculture* in the general background report regarding the minimum SPS requirements for landing sites, vessels and ice production.

Main observations noted:

* Artisanal vessels seem to be the main type of fishing vessels used in DR
* Some fishing vessels were made of material (wood) that is difficult to clean, while other vessels were made from fibre glass that is easy to clean
* Fishing vessels have insulated ice boxes and the fish is normally iced at sea, but in some cases fish is stored in the front of the boat with no ice
* Fish is normally gutted at sea and landed gutted
* Limited hygienic facilities on-board the vessels, but the boats stay out for 4-5 h
* Landing sites were not fenced off and there was inadequate overall management of the sites
* No ice production facilities at the site, but said to be close by (the mission Team was not able to verify this)
* Numerous unauthorised persons were observed at the site
* Some fish was processed and sold on the site i.e. not a clear separation between processing and landing of fish
* Poor hygiene conditions and cleaning procedures were used for the processing of the fish at the landing site e.g. the fish was sliced on uncleaned wooden/plastic cutting boards

## Processing establishment

The mission Team did not visit any processing establishments in the DR and could therefore not make any direct observations regarding the status of these type of processing facilities in regards to SPS requirements.

## Laboratories

The mission Team did not visit any laboratory facilities in the DR and could therefore not make any direct observations regarding the infrastructure, equipment or laboratory capabilities in the DR. Some information regarding the laboratory capacity was provided by CODOPESCA staff at the consultation held June 25th 2015 at Ministry of Agriculture (see section above), but this information could not be verified by the mission Team.

# Consultation with stakeholders

On June 26th 2015 a National Consultation with stakeholders was held. For the benefit of the local stakeholders this consultation was carried out in Spanish. However, neither of the consultants was good in Spanish and thus had to rely on an interpreter to understand what took place. This made it difficult to take notes during the consultation and may also have caused misinterpretation.

The key challenges highlighted were the following:

* The proposed changes in legislation related to food safety issues and its relevance for fishery and aquaculture products were presented and discussed
* The proposed Sanitary Regulation and the suggested standard SPS requirements for fishery and aquaculture products were presented and discussed
* Problems related to attitude and mind set of fishers and workers in primary production were discussed. Generally these workers have very limited education and therefore it is very difficult to transfer knowledge to them e.g. regarding maintenance of facilities, personal hygiene, hygienic handling of fish and the importance of ice for cooling of fish.

# Conclusion

The current legislation concerning potable water and fisheries products does not include requirements concerning public health issues equivalent to EC requirements.

The role and responsibilities of the CA does not include tasks related to the hygiene or public health aspects of fisheries products and the CA has no legal power to stop the production of the establishment in case of hygiene deficiencies, this is not in line with EC requirements.

The key to harmonization of regulatory enforcement is to have documented work procedures in place that explain in details how inspection should be conducted according to the regulatory requirements. Linked to such work procedures (usually called Inspection Manual) is a check list that can be used by the official inspectors during the inspection. In the DR no written procedures concerning official controls on fisheries products are in place. Moreover, have inspection reports and forms regarding SPS requirements and public health aspects of official control not yet been adopted.

The roles and responsibilities of the different agencies are not completely clear regarding SPS-related monitoringwhich results in confusion regarding the tasks of the different agencies. This is not unusual when no written documented procedures and/or agreements are in place between different agencies.

Limited accredited laboratories capacities are available in the country. The designated laboratory has the capabilities to carry out some official analysis on microbiology and heavy metals in the framework of the official controls of fisheries products. However, official monitoring of chemical risks (histamine, PAHs, dioxins and PCBs) are not carried out. Furthermore, neither a National Program for monitoring of environmental contaminants in products from wild fisheries nor a National Residue Control Plan for monitoring of residues of veterinary medicines and environmental contaminants in products from aquaculture are in place, this is not in line with EU requirements. In addition, no environmental monitoring regarding ciguatera toxin in fishery products nor the relevant dinoflagellates in seawater are carried out, despite the relevance for this type of monitoring in this area.

According to EU regulations the CA is required to carry out various official monitoring and surveillance of fishery products and water/ice. In order to fulfil these requirements the CA should take official control samples for analyses to verify compliance with the legislation and to assess consumer exposure in terms of food safety. The Team was informed that a limited number of official control samples are taken for analyses of water and fishery products in the DR, however this could not be verified as the team neither visited a processing establishment nor the designated laboratory.

Site visits indicated that SPS requirements related to health and food safety issues in the fisheries sectors are generally not enforced for fisheries products in the DR. Considerable effort is needed to change the mind-set of the fishermen, local fish vendors, processors and consumers e.g. regarding personal hygiene, hygienic handling of fish and the importance of ice for cooling of fishery products.

# Recommendations

The necessary legal framework should be implemented so that an official inspection service is responsible for carrying out official controls throughout the production chain of fisheries products i.e. from the fishing vessels or aquaculture farm to the exporting establishment. These official controls should cover all relevant requirements regarding SPS requirements and public health issues for fisheries and aquaculture products.

Inspection manuals are important to enforce regulations and to harmonize the inspection system. It is also important that the Food Business Operators are well informed regarding which requirements they must fulfil and how their operation are evaluated as that will assist them in fulfilling their obligation. Therefore it is recommended that written procedures (inspection manual) that explain in details how inspection should be conducted according to the regulatory requirements will be developed and implemented. Additionally, inspection reports and forms on official control should be adopted.

It is important to make sure that the CA is enforcing one harmonised standard for all fisheries products so that there are not two standards applied i.e. one for domestic market and another for the export market. Therefore, it is recommended to look for suitable training of control staff so that it will be able to carry out the official inspection service throughout the production chain of fisheries products according to the revised legislation that is currently in progress.

As the food processors are responsible for ensuring the safety of their production they are expected to exercise due diligence and self-controls (own checks), hence the testing for the microbiological status of food should be carried out by them. The CA should also take official control samples for microbiological analyses to verify that the food processors quality system is working. As this is an essential part of having license to operate it is not unfair that the industry covers the cost related to the analysis of these official control samples. This could, for example, be part of their annual license fee and if the results obtained are unsatisfactory extra payment from the FBOs in question should be required by the CA. This type of user fee would enable the CA to guarantee financial independence and sustainability of the official laboratories and that official control samples are tested on regular bases to verify the safety of water, ice and fisheries products.

The CA should ensure that official control samples for fishery products intended for export to the EU include official controls on the products, water and ice in line with the relevant Community requirements i.e. Regulation (EC) No 852/2004 and Directive 98/83/EC. The CA should also ensure that laboratories performing official analyses are assessed and accredited in accordance with standards providing guarantees at least equivalent to the requirements Regulation (EC) No 882/2004. The CA should also ensure that these laboratories take into account criteria for the different testing methods laid down in EC legislation. It is recommended that an assessment (including a cost-benefit analysis) is carried out to evaluate which laboratory analyses is feasible to accredit and conduct nationally and which would be more beneficial to outsource.

Testing for contaminants/undesirable substances that unintentionally come in contact with food/feed and primary products, e.g. PCB's and dioxins, are also the responsibility of the producer as he must secure the safety of his product. However, testing for these undesirable substances in each assignment sold is far too expensive. Therefore it is better to establish a national wide/regional wide monitoring plan that is carried out on regular basis to be able to assess consumer exposure to these undesirable substances. This type of monitoring plan for contaminants/undesirable substances in fishery products and water is currently not in place in the DR. Similarly, a National Residue Control Plan for monitoring of residues of veterinary medicines and environmental contaminants in products from aquaculture has not been implemented. As neither of these plans are currently in place in the DR a suitable solution needs to be initiated and implemented.

It is important to place in motion a plan to improve maintenance and hygiene on board fishing vessels as well as improve SPS requirements at landing sites in the DR. This could, for example, be done through wide ranged training of persons working in the primary processing and local fishery products processing facilities e.g. regarding general SPS requirements in fisheries and aquaculture sectors as well as the specific requirements of the EC and USA markets. Training and education of local consumers is also required to improve their understanding and perception regarding food safety of fisheries products. Sharing of experience and best practise as well as success stories from other countries in the Caribbean region could also be a suitable way to create an incentive for persons working in primary processing.

Improve the coordination of the different agencies e.g. different organizations are collecting various types of data and should cooperate in the development of a comprehensive data and information exchange system that could be used to monitor, share information and knowledge and report on SPS practices.

In order to be able to plan for anticipated future developments of the fish industry it is necessary to start to predict and plan for likely future demands of current export markets as well as look out additional markets and identify new fishery and aquaculture products for these markets. This requires increased research & development related to the fisheries sector, e.g. regarding development of new products, as this will assist the fisheries sector to move further up the value chain and create a business environment for entrepreneurs in the fisheries industry. This could be achieved through long term (5-10 years) strategic planning with the participation of key stakeholders in the fishery and aquaculture sectors as well as academia.

Caribbean countries should increase their research collaborations regarding ciguatera toxin in fisheries products and the type of dinoflagellates that may pose a risk to public health in Caribbean waters.

# Appendix

Consultation held in conjunction with National Consultation regarding; National programmes related to health and food safety in the fisheries and aquaculture sectors.

Attendants at SPS consultation held June 25th 2015 at Consejo Dominicano de Pesca y Acuicultura (CODOPESCA) in Dominican Republic

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Attendants at SPS consultation held June 25th 2015 at Instituto Dominicano de Investigaciones Agropecuarias y Forestales (IDIAF) in Dominican Republic

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