# Assessment report for Grenada

Dates of visit; 7 - 11 June 2015

Mission team: Mr. Margeir Gissurarson, Dr. Helga Gunnlaugsdottir and Dr. Susan Singh-Renton (experts from another consulting team on legislation related to health and food safety issues in the fisheries and aquaculture sectors also participated all consultations and site visits carried out in Grenada)

# Official agencies

To gather information regarding official control related to SPS measures in Grenada two consultations were arranged with staff from official agencies working in this area.

## Consultation held June 8th 2015 at Fisheries Division in Grenada

In addition to the experts from the two mission teams this consultation was attended by representatives from Fisheries Division (FD) and some members of the Technical National Implementation Network Team (TNINT) in Grenada that participated in part of the consultation: please refer to Appendix for the complete lists of attendance. 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.

It was clarified that Grenada has developed, enacted and implemented at national level the relevant fish and fishery product regulations according to EU requirements and has been exporting fishery products to EU since 2006. Nevertheless, USA is currently the main market for pelagic species, especially yellowfin tuna. The Team was also informed that there are currently no commercial aquaculture site operating in Grenada. The Competent authority (CA) in charge for official controls of fishery products is the Chief Environmental Health Officer (CEHO) under the Ministry of Health and CEHO is defined in the regulatory framework. In addition, four fisheries officers (FO) from the Fisheries Division (FD) under the Ministry of Agriculture, Lands, Forestry, Fisheries & Environment (MALFFE) are officially designated as fish inspectors to assist the CA regarding the supervision of the fisheries products processing facilities and fishing vessels. In this case the Ministry of Health is responsible for the work carried out by the FO. Certain requirement are set out by the CA regarding the training and qualification of the FO that are designated to carry out inspections and the four FO that are working in this area have a certification regarding their qualifications. Normally and audit/inspection of a fisheries products establishment is carried out simultaneously by health and fisheries officers. The team was informed that usually it is the same FO that carries out the inspection of facilities in a certain area in Grenada, but the system also allows for independent checks by other officers. The CA certifies the processing facilities and based on this certificate the FO give license to export fisheries products.

The Team was advised that there was no formal manual on inspections, but that the procedures followed are based on the existing regulations. FD staff confirmed that there was a checklist used for inspections and agreed to provide the Team with the set of forms used.

The Team was informed that Grenada is striving for a single, acceptable standard related to health and food safety issues in the fisheries sector, since the allowance of different standards could create weaknesses and loopholes for stakeholder operations.

## Consultation held June 9th 2015 with the Competent Authority

This meeting took place at the Ministry of Health and the aim of the meeting was to receive information from a representative of the CA in Grenada on the roles and responsibilities of the CA related to health and food safety in the fisheries sectors. The experts from both consultation teams and Mr. St. Louis from FD met with the Chief Environmental Health Officer (CEHO), Mr. André Worme, and one of the fisheries officer responsible for SPS matters, Mr. Jude Andrews.

The CEHO confirmed the information regarding roles and responsibilities related to health and food safety in the fisheries sectors provided at the consultation held the day before at the FD. The Team learnt that the CA conducts inspections of facilities 1-3 times per year. If corrective actions are required, the food business operators (FBOs) are given a deadline and time for remedial action. The CA collaborates with the FBOs regarding getting them up to standards, therefore the most serious deficiencies are prioritised and the FBOs work on improving them first. If the FBOs do not realise the corrective actions by the given deadline their licence to operate can be revoked.

The Team was informed that the only designated laboratory for official analysis in Grenada is the Produce Chemist Laboratory (PCL). The team also learnt that due to financial restrictions the CA does not currently carry out official sampling and check of water, ice and fishery products. An official monitoring plan for contaminants/residues in fishery products and water is also not in place. The Team was advised that waster testing was usually done by the National Water and Sewerage Authority and the results from these tests are sent to the CA. In addition, the operating facilities do their own tests, e.g. checks of heavy metals in water in USA, and the results from these tests are send to the CA. The Team was informed that the cost of analysis of official control samples taken by the CA are paid by the government i.e. the FBO do not pay user fees for the analysis of official control samples.

# Sites visited in Grenada

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

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

The Team made direct observations regarding the infrastructure, vessels, equipment, production environment, and made further enquiries to stakeholders at the sites visited about harvest and post-harvest procedures, fish transport, processing, laboratory analysis etc.

## 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 Grenada
* The internal surface of the fishing vessels was normally made of material (plastic/fibre-glass) that is easy to clean, however wood was also used on some surfaces that came in direct contact with the fish caught
* Fishing vessels have insulated ice boxes and the fish is iced at sea
* Fish is beheaded and gutted by the fishermen at sea and these parts of the fish are not utilised and are thrown back into the sea, after harvest the gutted fish is stored on ice in the boat storage area
* During landing of the fish, e.g. yellowfin tuna (YFT), it is transported from the boat storage area using hooks, but eventually the fishermen have to climb into the storage area to reach the fish, this poses a sanitary risk as they might forget to sanitise their boots and step on the fish.
* Some litter was observed at the site
* Ice production facility was available at a processing establishment close by the landing site
* No hygienic facilities were observed

## Processing establishment

The mission Team visited in total two processing establishments, both of these establishments processed mainly fish and their main emphasis was on export of raw tuna on ice. At one of the establishments, there was also limited production of smoked fishery products exclusively for the domestic market. The status of these establishments in regards to SPS requirements were adequate for fisheries product intended to be heated but insufficient for ready to eat products (e.g. tuna for sushi), please refer to the section *SPS requirements for fish and aquaculture* in the general background report regarding the minimum SPS requirements for processing establishments.

Main observations noted by the mission team:

Generally the structure, layout, maintenance and hygiene conditions for the processing and handling of raw material was satisfactory in terms of SPS requirements in both processing establishment visited as the fish processing only involved, cleaning, chilling and packaging of the fish . The Team however noted that at one of the establishments there was no separation between storage area and walking area in the ice processing facility, which could result in contamination of the ice as workers walk directly into this area. This establishment was currently in the process of installing a new ice processing facility to improve this deficiency. A HACCP system was in place in both establishments and the mission Team was informed that workers receive basic training. The team noted that the critical limits in the HACCP plan implemented in one establishment were not correctly defined.

The parts of the operations of these two processing establishments that were intended for fishery products for export were generally satisfactory in terms of SPS requirements, while a lower standard was applied for the part of their operation that was producing fishery products for the domestic market.

The Team was informed that both establishment place emphasis on cooling the fish caught down fast with ice as soon as possible after it has been caught and keeping it cold through the entire processing chain. In addition, the traceability of the tuna is of importance and therefore each fish is tagged at sea and data records kept for each individual landed and processed.

## Laboratories

The mission Team visited the Produce Chemist Laboratory (PCL), which has been designated by the CA in Grenada to carry out analyses on fishery products as well as water and ice in the context of official controls. The team was informed that this laboratory is not accredited to ISO standard 17025. The Team was also informed that the laboratory had not received any official control samples for microbiological analysis for two years. Furthermore, no official chemical analysis (heavy metals, environmental contaminants and histamine) on fishery products and water have been carried out for one year. The team observed that the environmental conditions in the official PCL were currently not adequate to be able to carry out accredited analysis e.g. not very clean, untidy and some equipment was not properly maintained.

The mission Team also visited Bureau of standards laboratory (BSL), which carries out microbiological analysis of food and water for various clients (including FBO). They aim to set up heavy metal analysis in food products in the near future and have already procured the necessary analytical equipment. BSL is independently financed i.e. raise 70% of their funds on their own. The team was informed that this laboratory is not accredited to ISO standard 17025, but BSL is working towards this goal and their aim is that the first analysis (pH and moisture) will be accredited by the end of this year.

# Consultation with stakeholders

Two consultations with stakeholders were held in Grenada i.e. a consultation with key stakeholders on June 9th 2015 and a National Consultation with stakeholders on June 10th 2015, please refer to Appendix for the complete list of attendance.

The key challenges highlighted were the following:

* The current processing of fishery products in Grenada is not very complicated i.e. it involves only weighing, cleaning and storing/holding the fish. If Grenada desires to export a ready to eat product, a higher SPS standard would need to be maintained. Further, if any “value added” activities were being considered, the present facilities would be faced with new challenges.
* Need to be able to guarantee financial independence and sustainability of the official laboratories so that official control samples are tested on regular bases. This could for example be done through user fees to cover the cost of the analysis of these samples. Nevertheless, it also necessary to make sure that this user fees is paid directly to the official laboratories and not into consolidated governmental funds.
* SPS requirements of various markets are basically the same, but are applied differently. Hence, the national system has to be flexible to manage these differences simultaneously. However, it is challenging to set up different quality control systems for different markets and such a multi-standard system would require strong official controls. At the moment there is for example limited fish trading among Caribbean countries due to limited harmonisation of standards across the Caribbean countries.
* FBOs need to have all documentation available at all times e.g. regarding own check according to HACCP, documentation is vital for transparency and legal purposes as well as for all audit visits by different authorities
* Needs of individual artisanal fishermen have to be addressed as they are lacking behind in terms of meeting SPS requirements e.g. regarding infrastructure, maintenance and hygiene facilities on-board the vessel and therefore they cannot participate according to standards. One solution to this problem has been the establishment of co-ops i.e. an association of Artisanal fishermen that collaborate together in terms of infrastructure, management etc. Nevertheless, the FO attending the consultations informed that the attitude and mind set of fishermen has improved considerably in the last 10 years due to considerable training at all levels in the fisheries production
* There is currently insufficient technical expertise and relevant university programs related to food science, environmental science and engineering in the country and this hampers research & development related to the fisheries sector e.g. regarding development of new products and value addition
* Responsibilities regarding monitoring and collection of data on contaminants detected in fishery products from wild fisheries could be shared within the region as this type of monitoring covers all marine species caught in Caribbean waters, hence this type of activity would benefit from a regionally coordinated approach
* Important to establishing a contingency plan for fishery products. Such a plan is necessary to react to serious health related risks through food consumption and sets the stage for institutional cooperation to be able to react quickly to outbreaks and minimize possible damages to human health.

# Conclusion

The Chief Environmental Health Officer (CEHO) within the Ministry of Health is clearly defined in the national regulatory framework as the competent authority (CA) of Grenada. They are responsible for official control of all food business operators and issue certificates and licenses. In addition, four fisheries officers (FO) from the Fisheries Division (FD) under the Ministry of Agriculture, Lands, Forestry, Fisheries & Environment are officially designated as fish inspectors to assist the CA regarding the supervision of the fisheries products processing facilities and fishing vessels. In this case the Ministry of Health is responsible for the work carried out by the FO.

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. This type of inspection manual that describes the implementation of inspections is not available in Grenada, a check list is however used but not supported by detailed work procedure, leaving the interpretation regarding inspection procedures, deadlines and enforcements of corrective action up to individual inspectors. This could cause problem in harmonizing the inspection system.

According to EU and national 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. However, due to lack of financial resources the CA in Grenada has no not been able carry out analysis of official food control samples for 1-2 years. Sometimes, these official analysis may be a prerequisite for issuing export licences. Furthermore, a National Program for monitoring of environmental contaminants in products from wild fisheries is not in place.

Currently there is no commercial aquaculture carried out in Grenada and therefore it is not necessary for the CA to implement a National Residue Control Plan (NRCP) for monitoring of residues of veterinary medicines and environmental contaminants in products from aquaculture. However, in case commercial aquaculture will be developed in Grenada in the future it will be necessary to implement the NRCP.

Accredited laboratories capacities are not available in the country, although this is a requirement for official analyses according to EU and national regulations.

Site visits indicated that the regulatory requirements related to health and food safety issues in the fisheries sectors of Grenada are generally enforced by the CA. Nevertheless, it was noted that the enforcement is different between production for export and production for the domestic market despite the fact that the same SPS regulatory requirements apply for all fish and fisheries production.

Normally it is the same FO that carries out the inspection of the facilities in a certain area in Grenada, this arrangement could create close relationships (friendship) between inspector and owner of FBO, which may lead to deviations from procedures for the inspection.

The current lack of technical expertise and relevant university programs related to food science, environmental science and engineering in the country is hampering research & development related to the fisheries sector e.g. regarding development of new products and value addition

# Recommendations

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 in official control in the fisheries sector. Further, it is advised that this inspection manual will be accessible to all stakeholders, for example on the Internet, free of charge.

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 FBO 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 Grenada, hence a suitable solution needs to be initiated and implemented.

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. Such double moral will not only lead to bad attitude towards food safety and public health but will also delay the development of the fishery sector and the fisheries communities and have a negative effect on the sustainable utilisation of the fishery resources.

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 for additional export 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.

# Appendix

Consultations 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 8th 2015 at Fisheries Division in Grenada

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