# Assessment report for Jamaica

Dates of visit; 17 - 20 June 2015

Mission team: Mr. Margeir Gissurarson and Dr. Helga Gunnlaugsdottir.

# Official agencies

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

## Consultation held June 19th 2015 at the Veterinary Service Division in Jamaica

In addition to the mission Team this meeting was attended by representatives from the Veterinary Service Division (VSD) and the Fisheries Division (FD) under the Ministry of Agriculture & Fisheries: please refer to Appendix for the complete list of attendants. The meeting 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 the VSD is the Competent Authority (CA) for fisheries products for export, but for other food items processed and sold on the local market the CA is the Ministry of Health.

The laws related to food safety and SPS measures of fishery products has recently been revised and now the same regulations apply for export and the domestic market.

There is a defined structure for the implementation of inspections and VSD has established an inspection manual based on the current regulation and a check list has been developed based on the inspection manual. Inspection of the Food Business Operators (FBOs) producing for export and vessels providing raw material for the export production are carried out based on the check list. At the end of the inspection all deviations are recorded on the check list, a date set for corrective actions and a copy left with the FBOs.

Financing of the CA is based on annual license fees for export. In addition, the FBOs pay for health certificates that are issued for export shipment. Furthermore, the FBOs are charged a fee for the analysis of all official samples taken at their establishment, this fee partially covers the cost related to these analysis.

The CA regularly takes official control samples of the fisheries products, as well as of the water used in the processing establishments producing for export. However, official control of fisheries products intended for the domestic market and potable water is not part of their responsibilities/task. The mission Team was informed that the CA had established a National Program for monitoring of residues of environmental contaminants and toxins in products from wild fisheries for export. This program includes monitoring the levels of marine biotoxins (PSP, DSP, ciguatera), pesticides, heavy metals (cadmium, lead and mercury) and microbiological testing in fishery products. Microbiological testing of water use in processing is carried out. Seawater monitoring analysis on toxin producing algae/dinoflagellates are also performed.

## Consultation held June 19th 2015 at the Ministry of Health (MoH)

In addition to the mission Team this consultation was attended by representatives from the MoH: please refer to Appendix for the complete list of attendants.

The mission Team was informed that MoH is responsible for SPS measures of all food produced and imported for the domestic market and therefore the CA of all domestic food. They conduct inspection of establishments, fish markets, retail stores, hotels and restaurants. Additionally all imported food is inspected routinely and protocols are in place regarding sampling of consignments. Fish inspection is carried out by trained public health inspectors and in regards to export they coordinate their effort with the VSD. A Memoranda of Understanding (MoU) is available between MoH and VSD.

The Team was informed that fish for the domestic market comes from three sources; wild fisheries, aquaculture and imported fish. Currently all aquaculture fish is sold on the domestic market. The fishery products for the domestic market originates from artisanal fisheries and are distributed through fish markets that are located at the landing sites. All fish handlers/vendors must obtain a permit prior to being able to handle/trade fish.

The Team was informed that in regards to aquaculture the MoH monitors water quality, feed and selling and processing (which mainly consist of gutting and descaling).

The Team learned that there is a concern regarding food safety for the many tourists entering the country as around 30% of the country GDP comes from the tourist industry. Fortunately, food-borne illnesses have not been common although the hygiene at the domestic landing sites and fish markets is not up to standard. MoU acknowledged that SPS measures of the domestic fishery products needs to improve but they are mainly due to social issues and therefore difficult to control.

The Team inquired about incidents on ciguatera poisoning from fishery products and the MoH informed that ciguatera outbreak have occurred in the past and in connection to consumption of barracuda and lion fish. They informed that there are ongoing consumer educational programs to increase the public awareness regarding the food safety of certain types of fish.

## Consultation held June 18th 2015 at National Environment and Planning (NEPA)

In addition to the mission Team this consultation was attended by representatives from the NEPA and FD: please refer to Appendix for the complete list of attendants.

The Team was informed that NEPA issues environmental permits for aquaculture. They use screening procedures to decide whether an Environmental Impact Assessment (EIA) is needed. They evaluate the quality of the water of the aquaculture site by looking at impacts from agricultural activities e.g. test for pesticides, heavy metals and test the discharge generated as a result of aquaculture activities. Furthermore, some basic microbiological tests for E coli and Faecal coliforms are performed. Currently they monitor around 300 sites.

The Team learned that the scope of NEPA is wide and they are involved in monitoring of all industrial activities that can cause environmental pollution. They are also called upon to investigate incidences that may be caused due to environmental pollution. NEPA has limited authority to enforce incidences connected to environmental contamination and therefore communicate their findings to the MoH and VSD relating to fisheries.

The mission Team was informed that NEPA does some sampling of marine waters and especially in evaluating water quality of beaches by taking samples for analysing of E coli and faecal coliforms.

In regard to processing facilities NEPA monitors the discharge water from the facilities. A regulation on waste water and sludge is in place that aims at reducing their impact on the environment.

# Sites visited in Jamaica

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 | 2 |
| Processing establishments | 0 |
| Aquaculture sites | 2 |
| Laboratory | 1 |

The Team made direct observations regarding the infrastructure, vessels, equipment, environment, and made further enquiries about harvest and post-harvest procedures, aquaculture feed storage, fish transport, etc. The mission Team did neither have the opportunity to make site visits to processing facilities nor to observe fishing vessels for export.

## 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.

Two landing sites were visited where artisanal fishermen that are members of established fishing co-operatives landed their fish and sold it at a fish market close to the landing sites.

Main observations noted:

* Artisanal vessels were made of material (wood) that is difficult to clean
* Fishing vessels have insulated ice boxes and the fish is iced at sea
* No ice production facility was available at the landing site. The Team was however informed that fishermen normally purchase ice block from vendors to bring with them to sea in ice boxes. This ice is broken up at sea and to chill down the fish. This procedure is generally the case when fishermen go far out and stay out for some days.
* Waste management was not in place at the landing sites and considerable amount of garbage was observed around the landing site, especially on the beach where the fish was landed.
* Retail and processing of the fisheries product intended for the domestic market was not carried out directly at the landing sites, but was executed at fish markets close by
* Poor hygiene conditions and cleaning procedures were used at the fish market to process fish intended for the domestic market e.g. unclean wooden cutting boards, seawater used for cleaning, limited use of potable water in the processing
* Poor maintenance of facilities at the fish market and animals (dogs) were observed at the site
* One of the landing site was a combination of fish landing site and a recreational beach. At this site the Team observed that discards from the processing was thrown back into the sea where people were bathing.
* Limited hygienic facilities were observed at the fish market and the recreational beach

## Aquaculture sites.

The Team visited two aquaculture sites. One was an aquaculture research facility operated by the Fisheries Department and the other was a Tilapia farm.

Main observations:

The research facilities were mainly focusing on possibilities for development and extension of aquaculture. Presently the main focus is on red hybrid Tilapia also some work on silver fish Tilapia and Pangasius.

The Team also visited one of the bigger Tilapia farms in Jamaica. Currently all product is sold to the local market. Fish from aquaculture is generally sold alive in Jamaica and therefore no processing takes place at the site. The water in the ponds was irrigation water and the Team was informed by the owner that environmental contaminants were not a problem, however a monitoring program for testing of contaminants was not in place. The Team was furthermore informed that no drugs were used in the production. A National Residue Control Plan for aquaculture products is not in place in Jamaica and analysis of residues of veterinary medicines and environmental contaminants in products from aquaculture are currently not carried out.

## Processing establishment

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

## Laboratories

The CA official laboratories is the VSD laboratory. They carry out microbiological analysis, testing of organochlorides (pesticides), heavy metals (mercury, lead and cadmium) and marine biotoxins (PSP, ASP and lipophilic toxins). For areas were VSD laboratory does not have the analytical capability, they collaborate with three laboratories all belonging to the University of West Indies and those laboratories have been designed by the CA to carry out official controls.

The Team was informed that the VSD laboratory is working towards accreditation according to the standard ISO 17025. All relevant quality control (QC) documents are in place and a Quality Manager has been recruited to work on the Quality Management System.

The VSD laboratory carries out analysis of official samples as well as samples from FBO. Testing of the FBOs samples mainly involve microbiological testing (Salmonella, E coli and Listeria).

The VSD laboratory has the laboratory capacities to carry out analysis of lipophilic marine biotoxins and ASP according to the method approved ty the European Union .

# Meeting with stakeholders

The mission team was informed that a stakeholder consultation could not be arranged as stakeholders participated in such a dialog very recently on similar issues.

# Conclusion

There are two CA for fisheries in Jamaica. For fish handling and processing for export VSD is clearly defined as the Competent Authority. For all food for the domestic market the MoH is the CA. Although the same regulatory framework applies for export and the local market, there is clearly a big difference in how the regulations are enforced. It is known that enforcement of regulations for local markets are more difficult to manage but in order to secure the safety and health of the population it needs to be addressed forcefully but gradually.

The VSD has a clear working procedures or an Inspection Manual that is based on the current SPS regulation and although it could not been confirmed it seem they are enforcing the regulation. The VSD monitoring is financed through annual license fees for export and fees for issuing export certificates. In addition VSD do charge fees for analysis of all official samples tested. This financial independence does allow for better planning and enforcement.

VSD has established a laboratory with necessary equipment to carry out most official testing and have trained staff to carry out the work. The laboratory is not accredited but VSD is working towards accreditation, which they will most probably receive based on their observed competence. As accreditation of tests require a minimum amount of samples some tests may need to be outsourced, as is the case of the VSD laboratory.

The CA takes official control samples for analyses of the fisheries products as well as of the water/ice used in the processing establishments producing for export, this is in line with EU requirements regarding official monitoring and surveillance of fishery products and water.

The enforcement of the SPS regulation for fisheries product intended for local consumption needs improvement. The condition of landing sites and handling of fish by vendors is not acceptable for food meant for human consumption. If stricter enforcement were applied fishermen and fish handlers would soon understand that if they want income form fisheries they need to follow the regulations in force. Food security is not about quantity of food but rather about delivering safe food that will provide better health and nutrition to the consumer and consequently a better standard of living.

Tourism provides around 30% of the country GDP and the tourists are fed by local fish. It was stated during the mission that not many food-borne illnesses from fish consumption has been reported by tourist but it is well known that in developed countries only about 15 to 20 per-cent of food-borne illnesses are reported and this number is even much less for tourists entering an area were food is expected to be unsafe. Although the food-borne illness may not be from fish consumption the fish may be a carrier of a pathogen entering other food causing the illness.

A National Residue Control Plan for aquaculture products is not in place in Jamaica and analysis of residues of veterinary medicines and environmental contaminants in products from aquaculture are currently not carried out.

Environmental permits are issued for aquaculture sites and Environmental Impact Assessment (EIA) is conducted depending on outcome of screening for new aquaculture site.

# Recommendations

There are two CA enforcing the SPS regulation in Jamaica, VSD is the CA for exported fish products and the MoH for all food items for the local market, including fish and fish products. Such a setup is known in many countries This double standard has caused confusion as regulatory requirements are only required sometimes and is dependent on the inspector carrying out audits at different places in the fish value chain and in the worst cases is when the authorities have accepted that the country regulations do not apply to certain stakeholders, without making changes to the legal framwork. Furthermore, bad handling of fish products does not only devaluate the fishery resources but will affect development of the industry. Therefore it is recommended that the SPS measures for the local market will be enforced, but based on the current situation a roadmap should be drawn up showing actions to be taken within a specified timeframe. It is also recommended that it should be considered to place all official control of food in one CA.

Landing sites need upgrading and proper management. SPS measures need to be applied and the official authorities need to set up a strategy to move things in the right direction. It needs to be understood by all fisherman and fish handlers that unsafe foo is not an option. It is recommended that the authorities set up a working plan in cooperation with stakeholders that will bring the boats and the landing sites in conformity to the minimum SPS measures within a reasonable time. It should also be kept in mind that tourism is about 30% of the country GDP and serious outbreak may affect that income.

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. In Jamaica there is currently a gap in the monitoring plan of environmental contaminants in fisheries products from wild fisheries as the present plan does not include analysis of fisheries products that are only for sale on the domestic market. It is recommended that this gap will be filled so this monitoring plan covers all major fisheries products that are consumed and traded in Belize. Monitoring and collection of data on contaminants detected in fishery products from wild fisheries could also 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.

A National Residue Control Plan should be established for the aquaculture farming. Although the products from aquaculture is only sold on the local market, residues if present could be harmful for the domestic consumer and number of tourists entering the country.

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.

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 18th 2015 at VSD in Kingston, Jamaica

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| --- | --- | --- | --- |
| **Name**  | **Designation** | **Name & Adress of Employer** | **email** |
| Margeir Gissurason | SPS expert and team leader | Matís | margeir@matis.is |
| Helga Gunnlaugsdóttir | SPS expert | Matís | helgag@matis.is |
| Stacy-Ann Gray | Regional Fisheries Extension Officer | Fisheries Division -Aquculture | sagray@moa.gov.jm |
| Wintorph Marsden | Senior Veterinary Officer | Veterinary Service Division (VSD) | wfmarsden@moa.gov.jm |
| Kerriel Green |  Veterinary Officer | Veterinary Service Division (VSD), Laboratory  | ktgreen@moa.gov.jm |
| Gavin Bellamy |  Veterinary Specialist  | Veterinary Service Division (VSD) | ggbellamy@moa.gov.jm |

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

Attendants at SPS meeting held June 18th 2015 at National Environment Planning Agency in Jamaica

|  |  |  |  |
| --- | --- | --- | --- |
| **Name**  | **Designation** | **Name of Employer & Country** | **Email address** |
| Margeir Gissurarson | SPS expert and team leader | Matís, Iceland | margeir@matis.is |
| Helga Gunnlaugsdóttir | SPS expert | Matís, Iceland | helgag@matis.is |
| Peta-Gaye Rookword | Legal Officer, Legal services NEPA | National Environment Planning Agency (NEPA), Jamaica | peta-gaye.rookword@nepa.gov.jm |
| Yvette Strong  | Senior Manager, Conservation & protection subdivision | National Environment Planning Agency (NEPA), Jamaica | ystrong @nepa.gov.jm |
| Prauletta Kolbush | Senior Manager | National Environment Planning Agency (NEPA), Jamaica | pkolbush@nepa.gov.jm |
| G.A. Kong | Director of Fisheries | Fisheries Division, Ministry of Agriculture & Fisheries, Jamaica | gakong@moa.gov.jm |
| Stacy-Ann Gray | Regional Fisheries Extension Officer | Fisheries Division, Ministry of Agriculture & Fisheries, Jamaica | sagray@moa.gov.jm |
| Tachala Joevanka | Fisheries Officer | Fisheries Division, Ministry of Agriculture & Fisheries, Jamaica | tjjoevanka@mov.gov.jm |

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

Attendants at SPS meeting held June 19th 2015 at Ministry of Health in Jamaica

|  |  |  |  |
| --- | --- | --- | --- |
| **Name**  | **Designation** | **Name & Adress of Employer** | **email** |
| Margeir Gissurarson | SPS expert and team leader | Matís, Iceland | margeir@matis.is |
| Helga Gunnlaugsdóttir | SPS expert | Matís, Iceland | helgag@matis.is |
| Stacy-Ann Gray | Regional Fisheries Extension Officer | Fisheries Division, Ministry of Agriculture & Fisheries, Jamaica | sagray@moa.gov.jm |
| Wintorph Marsden | Senior Veterinary Officer | Veterinary Service Division (VSD), Jamaica | wfmarsden@moa.gov.jm |
| Kerriel Green |  Veterinary Officer | Veterinary Service Division (VSD) laboratory, Jamaica | ktgreen@moa.gov.jm |
| Gavin Bellamy |  Veterinary Specialist  | Veterinary Service Division (VSD), Jamaica | ggbellamy@moa.gov.jm |