# Assessment report for Suriname

Dates of visit; 11 - 16 June 2015

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# Official agencies

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

## Consultation held June 12th 2015 at Fisheries Department in Suriname

In addition to the experts from the mission team this consultation was attended by representatives from Fisheries Department (FD) under the Ministry of Agriculture, Animal Husbandry and Fisheries; 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 Suriname.

It was clarified that the Fisheries Department (FD) is responsible for fisheries management and development of aquaculture. The FD is in charge of issuing fishing licenses to fishing vessels and catch certificate. Vessel monitoring system is mandatory for all trawlers and legislation present for protected areas. Observers from FD go on board fishing vessels and catches are registered on the basis of these observations, however the FD staff does not deal with SPS measures on board the vessels.

The Team was informed that Suriname 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 ????. The Competent authority (CA) in charge for official controls of fishery products is the Vis Keurings Instituut (VKI is the Dutch abbreviation) under the Ministry of Agriculture, Animal Husbandry and Fisheries and VKI is defined in the regulatory framework. However, there seemed to be some uncertainty about which agency functioned as the overall CA for food in general in Surname, but it appeared that several agencies were involved for example the Ministry of Health was involved in market inspections.

The Team was advised that the aquaculture legislation is currently under revision and when the new legislation has been passed and implemented aquaculture operations would need a licence as well as an Environmental Impact Assessment (EIA). At present, compliance was voluntary.

## Consultation held June 12th 2015 with the Competent Authority

This consultation took place at VKI and the aim of the consultation was to receive information from representatives of the CA in Suriname on the roles and responsibilities of the CA related to health and food safety in the fisheries and aquaculture sectors, please refer to Appendix for the complete lists of attendants.

The Team was informed that the CA inspects and licenses all fisheries production establishment for export i.e. fishing vessels, landing sites, processing plants and commercial aquaculture farms and issues health certificates for export & import of fisheries products. There is a defined structure for the implementation of inspections and written procedures (inspection manual & check list) are available and used to carry out the inspections of the facilities. An annual inspection plan is prepared that is based on risk assessment, history and complaints related to the respective facilities. There are four inspector trained as quality managers that perform the inspections and two assistant inspectors (samplers) help out. The inspectors are required to take a one year course in “Fish Inspection and Quality Management in the Fisheries Sector”, which is organised by the FD and the University of Suriname and recognised by the Ministry of Education. The CA currently inspects 60 industry fishing vessels (not artisanal boats), 7 landing sites, 16 processing plants and 3 commercial aquaculture farms. Only products coming from certain registered processing establishments can be exported to EU. The human resources of the CA are currently limited and therefore it places less focus on inspection of domestic fisheries production and facilities. In case the inspection reveals that 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 the CA can prevent the export of consignments to EU and if continued problems occur their licence to operate can be revoked. The Team also learned that HACCP plans are submitted by FBOs to the CA and it provides suggestions for improving the plans. Registering and approving of new fisheries establishments is also the responsibility of the CA and these procedures are documented. The Team was informed that the Bureau of Public Health (BPH) was responsible for other food control and that the CA collaborated with BPH on policy issues as well as laboratory services.

The Team leader enquired whether the SPS requirements were different for fisheries products destined for local consumption as the CA seemed to place less emphasis on inspection of domestic fisheries production, and it was clarified that the SPS requirements were supposed to be the same.

The Team learnt that while inspection procedures were documented the FBOs have to access these procedures at VKI, they were not currently available in electronic format as the website for VKI is still under development.

The Team was informed that the CA is a financially independent organization and their financing is based on import/export fees per kg of product. Health certificates are issued for each export shipment and paid for by the FBOs and the consumables for the laboratory tests are paid for by them as well, while the Ministry provides for the building, furniture and some laboratory equipment. This implies that the CA is not a completely financially independent organization as it is partly dependent on support from the FBOs regarding purchase of consumables for the official analysis.

The Team was advised that the only designated laboratory for official analysis in Suriname is the VKI laboratory (for details see section on Laboratories below).

Regarding challenges and capacity building needs the VKI staff acknowledged that there were difficulties to access suitable training opportunities, and that they were interested in doing internships with another experienced Competent Authority within EU. There is also a need for additional laboratory equipment.

## Consultation held June 12th 2015 with the National Institute for Environment and Development (NIMOS)

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

The Team was advised that there was not yet any specific environmental legislation in place in Suriname and the principal role of NIMOS is to provide environmental advice. NIMOS has prepared voluntary environmental guidelines for impact assessment of aquaculture and these are usually attached to operating permits, however, at the moment no license for aquaculture operation is needed.

The Team learned that a National Program for monitoring of residues of environmental contaminants in products from wild fisheries is currently not in place.

The Team was informed that the national water company had responsibility for testing the general drinking water and VKI deals with potable water used in fisheries and aquaculture sector.

# Sites visited in Suriname

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

|  |  |
| --- | --- |
| **Type** | **Number**  **of visits** |
| Landing sites | 5 |
| Fishing/freezer vessels | 2 |
| Processing establishment | 6 |
| Laboratory | 1 |

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:

* Industrial fishing and freezer vessels as well as artisanal vessels are used in Surinamese waters
* Poor state of maintenance of the vessels, which were not made of corrosion-resistant material which was not smooth and easy to clean
* Absence of temperature recording devices on-board the vessels
* Fish is not bled and some fish species are gutted at sea while others are not
* Industrial fishing vessels use plastic boxes for storing the fish caught on ice on-board the vessels, these boxes are also used to transport the fish on ice from the vessels to refrigerated trucks or directly to processing facilities
* Limited hygienic facilities on-board the vessels
* Poor hygiene conditions and cleaning procedures on-board the vessels
* Some artisanal vessel landing sites were not fenced off
* Animals (dogs and rats) were observed at the artisanal landing sites
* Ice production facilities were generally available at the landing site and tubes used to transport ice to the holding area on-board the vessels
* In some cases the unloading of artisanal vessels was carried out by throwing the fish onto the dock using bare hands, after this the fish was transferred to plastic boxes with no ice
* In a truck used to transport fish from an artisanal landing site the fish was stored on the floor of the truck and in plastic boxes. Some ice used to cool fish, but also fish without ice was observed because the truck was used to sell fish directly to customers at the site. The Team noted that workers stood on the fish & ice in the storage area of the truck and sorted the fish using their bare hands

## Processing establishment

The mission Team visited in total six processing establishments, three of these establishments processed fish, one establishments processed fish and shrimp, one establishments processed surimi and one only shrimp. The status of the facilities in regards to SPS requirements ranged from being very good to poor; please refer to the section *SPS requirements for fish and aquaculture* in the general background report regarding the minimum SPS requirements for processing establishments. The mission team noted that the processing establishments that were producing fishery products for export were satisfactory in terms of SPS requirements, while the establishment producing fishery products for the domestic market was not.

Main observation noted by the mission team:

In four out of the six establishments visited the structure, layout, maintenance and hygiene conditions for the processing and handling of raw material was satisfactory, these four were all producing fisheries products for export. In one establishment producing fisheries products for export some problems related to maintenance were observed e.g. poor floors with cracks and pooling of water; unsuitable walls, which were rough and not easy to clean; poor state of maintenance and cleanliness of changing rooms. In another establishment producing fisheries products exclusively for the domestic market many problems were observed related to structure, layout, maintenance and the processing environment of the facility e.g. inadequate lay-out, with insufficient separation between clean and unclean areas which could lead to cross-contamination; poor maintenance of walls, floors, equipment, tools, and doors; windows, doors and openings not pest proof, but a rodent was observed at the landing site next door; poor hygiene conditions and cleaning procedures were applied.

A HACCP system was in place in five out of the six establishments visited, while in one no food safety system was available. All five establishments that had a HACCP system were exporting fisheries products, while the one with no food safety system was producing fisheries products for the domestic market. The team noted that the critical limits in the HACCP plan implemented in one establishments were not correctly defined.

The managers of the five establishments that were exporting fisheries products confirmed that the CA (VKI) inspects their facilities on regular bases and provides them with formal inspection reports and results of analysis of official control samples taken at their facilities, the Team was also shown an example of these documents for verification. They also confirmed that in case the inspection reveals that corrective actions are required, they are given a deadline and time for remedial action. The establishment producing fisheries products for the domestic market was not inspected by the CA (VKI), but Team was informed that the Bureau of Public Health was responsible for the inspection of their facilities.

## Laboratories

The VKI laboratory is the designated laboratory for official analysis in Suriname. The VKI suffered a fire in 2010 after which their operation was carried out in a building next to FD. A new facility for their operation had been provided only recently and the laboratory in this facility was still under construction and therefore currently not fully functional for official analysis. The VKI laboratory is not accredited, but is working towards ISO17025 accreditation of the laboratory. As the VKI laboratory facility was not yet fully operational the team was advised that some of the laboratory analyses were currently done by the Central Laboratory under the BPH, but this laboratory is also not accredited.

The VKI laboratory carries out microbiological analysis, histamine analysis (with the ELISA rapid kit test), organoleptic and freshness test (TVB-N). Several analytical test are currently outsourced e.g. the microbiological analysis of fisheries products and analysis of heavy metals (Mercury, Lead, Cadmium, Zinc) are preformed by Central Laboratory, while PAHs in smoked products and residue tests for aquaculture products are carried out abroad. The team was informed that a National Program for monitoring of residues of veterinary medicines and environmental contaminants in products from aquaculture is in place. The team was informed that a National Program for monitoring of residues of veterinary medicines and environmental contaminants in products from aquaculture is in place.

The VKI laboratory aims to implement heavy metal analysis with Atomic Adsorption and histamine analysis with HPLC in the near future.

Regarding user fees and payments to the VKI laboratory, it was clarified that the law made a specific provision concerning monthly official control samples. However, based on results of these samples, the CA (VKI) would then identify a need to resample. The Team leader highlighted that sampling should be based on risk assessment, and so he expressed some concern that the inspection process was not separate from the laboratory service (both under the charge of VKI). In response VKI staff explained that samples for regular checks and official control were paid by the VKI, according to the law. The user fee was paid only based on the amount exported.

# Consultation with stakeholders

On June 15th 2015 a National Consultation with stakeholders was held.

The key challenges highlighted were the following:

* The current processing of fishery products in Suriname is in some cases not very complicated i.e. it involves mainly weighing, descaling, cleaning, and storing/holding the fish. If these establishments would like to export a ready to eat product, a higher SPS standard would need to be maintained. If any “value added” activities were being considered, these processing facilities would also be faced with new challenges.
* The issue regarding the transparency in inspection procedures was discussed and the consultants explained that it is 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.
* The problems related to maintenance, poor hygiene conditions and cleaning procedures on-board the vessels were discussed. It was explained that was mainly due to attitude and mind set of fishers and workers in primary production. 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. It was also pointed out that such training could not be delivered by the usual conventional methods and suggested that this training could begin with the captains and their first assistants.
* Management environment for owners of fisheries facilities, i.e. processing establishments & vessels, is very instable in Suriname, which in turn reduces the willingness to invest in the maintenance of boats. Furthermore, catches are decreasing which also reduces their willingness to maintain boats, because of the unpredictability of the future.
* There is currently insufficient research and development in the fisheries industry in Suriname and this hampers progress in the fisheries sector e.g. regarding development of new products and maximum use of all raw material that could lead to value addition and built up of a more science/knowledge based industry

# Conclusion

The Competent authority (CA) in charge for official controls of fishery products is the Vis Keurings Instituut (VKI is the Dutch abbreviation) under the Ministry of Agriculture, Animal Husbandry and Fisheries and VKI is defined in the regulatory framework. The CA inspects and licenses all fisheries production establishment for export i.e. fishing vessels, landing sites, processing plants and commercial aquaculture farms and issues health certificates for export & import of fisheries products. An annual inspection plan is prepared that is based on risk assessment, history and complaints related to the respective facilities.

There is a defined structure for the implementation of inspections and written procedures (inspection manual & check list) are available and used to carry out the inspections by the CA of the facilities. This type of documented written procedures are the key to harmonization of regulatory enforcement and they should be easily accessible to stakeholders, this is not the case in Suriname as FBOs have to access these procedures at VKI facilities.

The CA is to a large degree a financially independent organization and their financing is based on import/export fees per kg of product. Health certificates are issued for each export shipment and paid for by the FBOs and the consumables for the laboratory tests are paid for by them. Therefore, the CA is not a completely financially independent organization as it is partly dependent on support from the FBOs regarding purchase of consumables for the official analysis.

Accredited laboratories capacities are not available in the country, even though this is a requirement for official analyses according to EU and national regulations. The designated official laboratory has the capabilities to carry out some essential official analysis, however some of the more complex chemical analysis (e.g. veterinary residue testing) are outsourced to laboratories abroad. Further, the analysis of histamine in official samples is not carried out according to EC regulation No 2073/2005.

The inspection process of the CA is not clearly separated from the laboratory service as they are both under the charge of VKI.

Suitable training opportunities related to EU requirements and working procedures in official control are not available for the staff of the CA within the country.

A National Program for monitoring of environmental contaminants in products from wild fisheries is not in place in Suriname, this is not in line with EC regulations e.g. Reg. (EC) No 882/2004 & Reg. (EC) No 1883/2006.

Site visits indicated that the regulatory requirements related to health and food safety issues in the fisheries sectors of Suriname are generally enforced by the CA for fisheries products intended for export, but not for the domestic market. Many problems e.g. related to maintenance, hygiene conditions and cleaning procedures were observed in the entire production chain for fisheries products intended for the domestic market. Therefore, there is difference between the enforcement of regulations for fisheries products for export and production for the domestic market despite the fact that the same SPS regulatory requirements apply for all fish and fisheries production.

The problems observed in the entire production chain for fisheries products intended for the domestic market are due to attitude, mind set and limited education of fishermen and workers in the primary production.

The management environment for owners of fisheries facilities, i.e. processing establishments & vessels, is very instable, which in turn reduces the willingness to invest in the maintenance of boats.

There is currently a lack of research and development in the fisheries industry in Suriname and this hampers progress in the fisheries sector e.g. regarding development of new products and maximum use of all raw material that could lead to value addition and built up a more science/knowledge based industry

# 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 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 type of user fee system has already been implemented in Suriname as the FBOs pay export fee that is used to finance the CA. however, this export fee does not cover the entire cost of the operation of the CA and it is recommended that this will be amended to guarantee financial independence and sustainability of the official laboratories. Further, the export fee payed by the FBOs is only determined by Kg catch not value of fish, thus if value of fish caught is low it may be difficult for FBOs to pay the export fee, this problem should to be address by the relevant stakeholders to safeguard the economic stability of all parties.

It is recommended that a complete financial separation between the inspection process for fisheries products of the CA in Suriname and the designated laboratory for official analysis will be ensured. This is important for good governance and in order to be able to cope with all the emerging needs in a transparent and conflict-free manner.

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 Suriname, 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.

It is advised to look for suitable training opportunities for the inspectors/staff of VKI e.g. regarding methods of sampling and laboratory analysis of official food/feed samples. This could for example be done through internships of the VKI control staff at an experienced CA in EU, there may also be possibilities through 3rd country twinning support by EU e.g. "Better and Safer Food Training" which is carry out by the EU Directorates Enlargement and DG SANCO.

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.

# 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 12th 2015 at Fisheries Department in Suriname

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Attendants at SPS consultation held June 12th 2015 at Vis Keurings Instituut (VIK) i.e. Fish Inspection Institute in Suriname

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Attendants at SPS consultation held June 12th 2015 at National Environmental Institute (NIMOS) in Suriname

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