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**Proposed Framework for Regional Cooperation on CARIFORUM Standards for Fish and Fishery Product Hygiene**

**Caribbean Fisheries Regional SPS Framework**

**August 2015**

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## About this Document

This document introduces the proposal for the development of a Caribbean Regional Fisheries SPS Framework. It is the first of four documents, setting out the framework in detail and comprising:

1. **Caribbean Regional Fisheries SPS Framework**
2. **CARIFORUM Protocols on Good Fish and Fishery Product Hygiene Practices**
3. **CARIFORUM Model Fisheries Export Legislation**
4. **Additional Guidance on Good Fish and Fishery Product Hygiene Practices**

The document is produced under the Sanitary and Phytosanitary Measures programme, one component of the 10th EDF Programme titled “*Support to the Caribbean Forum of ACP States in the Implementation of Commitments Undertaken Under the Economic Partnership Agreement (EPA): Sanitary and Phytosanitary Measures (SPS)*”, implemented by the Inter-American Institute for Cooperation on Agriculture (IICA), with the fisheries sub-component being executed by the CRFM Secretariat. The project aims to facilitate CARIFORUM States to gain and improve market access by complying with Europe’s Sanitary and Phytosanitary (SPS) measures and to help CARIFORUM states to better develop their own regionally harmonized SPS measures and institutional capability to meet the requirements necessary to maintain and expand on the trade of fish and fish products locally, regionally and internationally.

## Acronyms and Abbreviations

|  |  |
| --- | --- |
| **APHIS** | Animal and Plant Health Service of the USA |
| **CA** | Competent Authority |
| **CABI** | Commonwealth Agricultural Bireaux International |
| **CAC** | CODEX Alimentarius Commission |
| **CAHFSA** | CARICOM Agricultural Health and Food Safety Agency |
| **CARDI** | Caribbean Agricultural Development Institute |
| **Carib-Vet** | Caribbean Animal Health Surveillance Network |
| **CARICOM** | Caribbean Community |
| **CBD** | Convention of Biological Diversity |
| **CCAP** | CARICOM Community Agricultural Policy |
| **CDC** | Centres for Disease Control |
| **COTED** | Council for Trade and Economic Development |
| **CROSQ** | CARICOM Regional Organization for Standards and Quality |
| **CSME** | Caribbean Single Market and Economy |
| **EMA** | Environmental Management Authority |
| **EPA** | Environment Protection Agency |
| **EPA** | Economic Partnership Agreement |
| **FAO** | Food and Agricultural Organization of the United Nations |
| **FDA** | Food and Drug Administration |
| **GAP** | Good Agricultural Practice |
| **GMOs** | Genetically Modified Organism |
| **HACCP** | Hazard Critical Control Point |
| **ICPM** | International Commission on Phyto-sanitary Measures |
| **IICA** | Inter-American Institute for Co-operation in Agriculture |
| **IPPC** | International Plant Protection Convention |
| **ISO** | International Organization for Standards |
| **MS** | Member State |
| **MRL** | Maximum Residue Limits |
| **NAHFSA** | National Agricultural Health and Food Safety Committee |
| **NARI** | National Agricultural Research Institute |
| **NEPA** | National Environmental and Planning Agency |
| **NGO** | Non-Government Organization |
| **OECD** | Organization for Economic Cooperation and Development |
| **OECS** | Organization of Eastern Caribbean States |
| **OIE** | Office of International des Epizootics |
| **PAHO** | Pan American Health Organization |
| **PVS** | Performance Valuation Strategy Tool |
| **RIMSA** | Inter-American Meeting of the Ministers of Health and Agriculture |
| **SIRVETA** | Regional Inspection System for FBD Surveillance |
| **SPS** | Sanitary and Phyto-sanitary Measures |
| **SRC** | Scientific Research Council |
| **STDF** | Standard and Trade Development Facility |
| **SWOT** | Strength Weaknesses Opportunity and Threats |
| **UNEP** | United Nations Environmental Programme |
| **USAID** | United States Agency for International Development |
| **USDA** | United States Department of Agriculture |
| **UWIC** | University of the West Indies Consulting Unit |
| **VPH** | Veterinary Public Health |
| **WHO** | World Health Organization |
| **WTO** | World Trade Organization |

# Part 1 Introduction

## Background

The fisheries sector is important for CARIFORUM States as it provides employment, contributes to food security and to export earnings. Direct employment in marine fisheries and aquaculture is over 120,000, with suppliers of goods and services and other indirect service contributing over 350,000 jobs. Total marine fish production is estimated to be over 180,000mt (2012), with the fish being sold mainly on the domestic market. A proportion – mainly but not only industrial catches – are exported, usually after some primary level processing (freezing and packaging). The total earnings from marine capture fisheries and aquaculture export was over USD 191 million in 2012. The main export markets are in the United States, the European Union (at least for some countries) and intra-regional, although small levels of exports also take place to other countries, including increasingly in Latin America and Asia.

The development, and even maintenance, of international fisheries markets raises significant challenges. These include: increasing food safety awareness amongst consumers; continually developing regulatory demands from importing countries; increasing technological advances which require capacity-building, training and funding; etc. Similar to other developing and in-transition regions, Caribbean countries are faced with severe challenges due to financial, legal, technological and human resource constraints. In most CARICOM countries, effective agricultural health and food safety control measures, including those for fisheries, are undermined by the existence of out-dated and/or fragmented legislation, multiple jurisdictions, weaknesses in food-borne related diseases (FBDs) surveillance, inadequate monitoring and enforcement of regulations, inadequate budgetary allocations and a lack of facilities and trained personnel.

The implementation of SPS measures offers the potential to expand exports of food and agricultural products in MS. With agricultural production being the focal point of the economies of most developing countries, such food protection measures are essential. Creating and sustaining international trade in food products **rely** on building the trust and confidence of importers and consumers in the integrity of the region’s food systems. A sound animal health strategy ensures a high level of public health and food safety by minimizing the incidence of biological and chemical risks to humans, promotes good farming practices, minimizes negative environmental impacts and supports sustainable development.

On the other hand, it is recognized as imperative that they maintain and develop export markets for their fisheries products which means ensuring that the very stringent internationally acceptable food safety standards are met routinely within the region. In some MS these constraints mean that the export requirements of the EU are not able to be met, even though there are private sector operators that have fully operational systems such as HACCP and meet relevant international standards. Even in those countries that do export to the EU, it is recognized that vigilance needs to be maintained to ensure long-term access.

Currently, various regional initiatives are taking place with a view to strengthening regional SPS. Most significantly, the CARICOM Agricultural Health and Food Safety Agency (CAHFSA) has started to operationalize, and to implement its Strategic Plan (Road Map) and Medium Term Work Plan. The Inter-American Institute for Cooperation on Agriculture (IICA) has been involved in a number of initiatives through its Agricultural Health and Food Safety programme, some in conjunction with other regional organizations, such as the Caribbean Regional Fisheries Mechanism (CRFM), or global organizations, such as the OIE. Within this context, the current document is produced under the EU-funded, 10th EDF Programme *Support to the Caribbean Forum of ACP States in the Implementation of Commitments Undertaken Under the Economic Partnership Agreement (EPA): Sanitary and Phytosanitary Measures (SPS)*, implemented by IICA, with the fisheries sub-component being executed by the CRFM Secretariat. The project aims to facilitate CARIFORUM States to gain and improve market access by complying with Europe’s Sanitary and Phytosanitary (SPS) measures and to help CARIFORUM states to better develop their own regionally harmonized SPS measures and institutional capability to meet the requirements necessary to maintain and expand on the trade of fish and fish products locally, regionally and internationally.

## Regional Legal and Institutional Framework

It is recognised that ensuring the long-term development of fish and fishery product hygiene and food safety will require action both at the regional and national levels. Regionally,

### CARICOM

The Revised Treaty of Chaguaramas impacts on a regional SPS framework in a number of ways. Most directly, Article 57 of the Revised Treaty, speaks of the implementation of the Community Agriculture Policy for achieving the goals as set out in Article 56, in order to support among other objectives: the establishment of an effective regime of sanitary and phytosanitary measures. However, many other parts of the Revised Treaty also elaborate the framework for regional SPS; particularly relevant are provisions in Chapter 5 on ‘Community Trade Policy’, Chapter 7 on ‘disadvantaged countries, regions and sectors’, Chapter 8 on ‘competition policy and consumer protection’ and Chapter 9 on ‘dispute settlement’.

Fisheries exports are an integral part of Community Trade Policy, the goal of which under Chapter 5 includes “the sustained growth of intra-Community and international trade”. Among the objectives of Community Trade Policy under the Treaty are the active promotion of export of internationally competitive goods and services originating within the Community; the establishment of common instruments, common services and the joint regulation, operation and efficient administration of the internal and external commerce of the CSME; and participation and joint representation in international and regional organizations governing international and regional trade.

Trade in fisheries products is also a component of the Caribbean Single Market and Economy (CSME), and the harmonization of SPS measures across CARICOM countries is one area where significant implementation deficits exist. The core CARICOM institutions, including the Secretariat and COTED, have a role to play in guiding and developing policy, and assisting agencies such as CAHFSA and CRFM in the development and implementation of proposals and programmes for the achievement of the objectives of the Community.

### Caribbean Agricultural Health and Food Safety Agency (CAHFSA)

The Caribbean Agricultural Health and Food Safety Agency (CAHFSA) to provide regional and national support to the countries of the Caribbean in establishment, management and operations of their agricultural health and food safety programmes and more specifically to execute on behalf of those countries such actions and activities that can be more effectively and efficiently executed through a regional mechanism. It aims to compliment and build upon existing Caribbean programmes in animal and plant health and food safety in support of National Agricultural Health and Food Safety Services for Member States, and will specifically plan, organize and implement activities that will assist regional and national authorities to more effectively and efficiently fulfill their food control programmes from “farm to fork” and facilitate increased trade and improved human health.

Its specific objectives include:

* To provide a framework for the continuous monitoring and evaluation of national and regional agricultural health and food safety programmes and the provision of technical support directed at strengthening the respective programmes.
* To provide an effective mechanism for partnership in the efficient use of scarce human and financial resources and infrastructure in protecting human, plant and animal health.
* To provide a mechanism for the coordination and integration of technical support to stakeholders by the Regional and International Organizations.
* To facilitate the development of regional SPS standards and the use of such standards as well as international SPS standards.
* To strengthen the legal framework for SPS issues.
* To facilitate the harmonization of technical procedures in relation to matters such as Good Agricultural Practices (GAPs), Good Manufacturing Practices (GMPs), HACCP, quarantine systems, surveillance and laboratory analysis.
* To provide a framework for the identification and definition of the human and financial resource requirements or national health and food safety programmes, and the determination and execution of strategies to address deficiencies, including the training of personnel and the mobilization of external funds.
* To provide a mechanism for regional consensus building on SPS issues that can be represented in international fora such as SPS Committee of WTO, FTAA, Codex Alimentarius Commission and IPPC.

Promotion of the development and use of regional and international SPS standards; support for the development and strengthening of legislative framework; and harmonization of technical procedures are among the key functional areas of focus for CAHFSA.

### Caribbean Regional Fisheries Mechanism (CRFM)

CARICOM established the Caribbean Regional Fisheries Mechanism (CRFM) in 2002 to promote and facilitate the responsible utilization of the Region’s fisheries and other aquatic resources for the economic and social benefits of the current and future population of the region. All CARIFORUM States are members of the CRFM, with the exception of the Dominican Republic (which cooperates closely through a Memorandum of Understanding).

The objectives of the CRFM are: (a) the efficient management and sustainable development of marine and other aquatic resources within the jurisdiction of Member States; (b) the promotion and establishment of cooperative arrangements among interested States for the efficient management of shared, straddling or highly migratory marine and other aquatic resources; and (c) the provision of technical advisory and consultative services to fisheries divisions of Member States in the development, management and conservation of their marine and other aquatic resources.

In order to address SPS issues in marine fisheries and aquaculture, a plan is outlined in the CRFM’s Strategic Plan and Biennial work plan, which represents a consensus of Member States priorities, under Strategic Objective C: Sustainable Management and Use of Fisheries Resources. The overall aim of the SPS plan is to reduce post-harvest loss, improve the quality of fish and fisheries products, and improve infrastructure for marketing and trade of fish and fisheries products to meet domestic needs and international standards.

### Caribbean Standards Organizations (CROSQ)

The CARICOM Regional Organisation for Standards and Quality (CROSQ) is the regional centre for promoting efficiency and competitive production in goods and services, through the process of standardization and the verification of quality. In this regard, CROSQ aims to support international competitiveness for the enhancement of social and economic development of the region.

It has adopted at the regional level two of the major Standards relating to fisheries SPS – *Code of Practice for Fish and Fishery Products* (CRCP 4: 2010) and *Code of Practice for Food Hygiene - General Principles* (CRCP 5: 2010). In terms of a role within a regional framework for fisheries SPS, CROSQ would have a general and a specific role. Specifically, it would maintain its role as the regional standard setting body and – where appropriate Standards relating to fisheries hygiene, production and trade are identified, CROSQ’s normal procedures would continue to apply, with the support of the other institutions involved in the regional framework. On the other had, in the development of implementation of SPS measures more widely, and in particular the development of Protocols and Guidelines, CROSQ has considerable experience and expertise to being to other participants and can be expected to undertake an advisory role.

### Caribbean Community Common Fisheries Policy

Finally, the recently approved Caribbean Community Common Fisheries Policy includes several provisions addressing Sanitary and Phytosanitary (SPS) issues in fisheries, including 3 of the 9 objectives (Art 4.3(b) (g) and (i)), and Article 18 which calls for cooperation in the development of: harmonised food quality assurance legislation; harmonised intra-regional SPS measures; common marketing standards for fisheries and aquaculture products; and (d) national or common policies, measures and standards to (among other things): develop new and existing markets in fishery products including external markets for the Caribbean region’s fisheries products and facilitate trade between the Participating Parties.

# Part 2 Need for a Fisheries Regional SPS Framework

[note – this chapter is under consideration; the document is already quite long, and I don’t want to detract from the main discussion in Ch 3; I will await feedback before adding this].

## Introduction

## Harmonization

## Strengthening national legislation

## Removing intra-regional trade barriers

## International representation

# Part 3 Caribbean Fisheries Regional SPS Framework

## Overview

The overall objective of increasing production and trade in agriculture and fisheries that meets international standards while protecting plant, animal and human health and the environment can only be achieved through a combination of regional and national cooperation and implementation. The vision needs to reflect both the long-term needs of the region and the short-term constraints.

The current Action is directed towards creating and/or strengthening the Regional and National SPS systems through systematic focus on:

a) the establishment of a sound and comprehensive national and regional legislative framework for food safety, plant and animal health in the fisheries sector;

b) the development and organization of an efficient responsive institutional framework and mechanism for coordination of SPS issues at both the national and regional levels.

In developing a comprehensive institutional and legislative framework, consideration is given in particular to identifying those actions which can most efficiently and effectively be achieved at the regional level, and those which should remain at the national level (with regional support). Significant in this context is that there is considerable standardisation of many SPS requirements: Caribbean MS are in general striving to meet the same international standards and requirements. At the same time, one of the identified key constraints is the challenge – *in each MS* – of applying the requirements in national legislation and staying up to date with the continuing development of these requirements.

**A key objective in the Regional SPS Framework therefore is to facilitate and streamline the transposition of SPS standards into national legal systems**.

At the same time, the Regional SPS framework aims to support harmonization of standards, procedures and systems within the region, to develop common approaches and cooperative approaches in areas such as laboratory accreditation, conformity assessment, representation in international meetings, project development and funding, exchange of information, etc.

In order to achieve these objectives, the following components are foreseen within the Caribbean Fisheries Regional SPS Framework:

1. A **regional governance mechanism**, established by means of a trilateral **Memorandum of Understanding** between CAHFSA, CRFM and CROSQ.
2. A regionally-agreed set of **Standards, Protocols and Guidelines** adopted through a **mechanism** for development and approval.
3. **Model legislation** which permits for the incorporation of the regionally-agreed Standards, Protocols and Guidelines into national law, whilst respecting the national regulatory and control requirements needed to ensure national food safety and export regulation compliance.

## Governance

An effective governance mechanism requires: (1) full involvement and proper coordination amongst the regional institutions directly concerned (CAHFSA, CRFM and CROSQ); (2) clearly defined objectives for cooperation; (3) clearly defined roles, responsibilities and procedures for the implementation of specific areas of cooperation; and (4) mechanisms for coordination with national authorities concerned with SPS.

It is proposed that a quasi-formal mechanism is established by means of a trilateral **Memorandum of Understanding**. (A draft MOU is presented in **Annex 1**). The MOU would have specific and general objectives for the Parties as follows:

* developing and implementing the Regional Framework for SPS in the Fisheries Sector;
* cooperating in the development and implementation of other regional approaches and actions in support of SPS measures in the fisheries sector;
* enhancing the action and operation of each party in the fisheries sector; and
* avoiding unnecessary duplication of efforts by any party in the fisheries sector.

A specific role for the Parties would be to review and adopt proposed Standards, Protocols and Guidelines through a specifically developed mechanism (see section 3.3). In addition there are agreements to cooperate generally in areas such as technical cooperation, capacity building, information exchange and international representation.

## Standards, Protocols and Guidelines

A key feature of the Caribbean Fisheries Regional SPS Framework is the establishment of mechanism to adopt regionally-agreed **Standards, Protocols and Guidelines**: see **Annex 2**. These documents vary in nature and legal effect:

**Standard:** means a guideline approved by a recognized body that provides for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods, with which compliance is not mandatory (Agreement establishing the CARICOM Regional Organization for Standards and Quality, Art. 1)

**Protocol:** means a set of rules, conditions or guidelines, which may incorporate in whole or in part any Standard, approved by a recognized body and with which compliance is intended to be mandatory in national legal systems (Model Export Control Act, draft section 1).

**Guidelines:** means any document or set of documents, other than a Standard or Protocol, which describes best practices characteristics for products or related processes and production methods, and which is included in the **catalogue of best practices** (see **Annex 2**).

**Draft Protocols (Pre-requisite programme)**

* Biosecurity Control
* Chemical Use Control
* Environmental Sanitation Control
* Equipment Use and Maintenance
* Facility Sanitation and Maintenance
* Fishery Facility Food Safety System
* Fishery Product Recall Response
* Fishery Product Storage
* Fishery Product Traceability
* Harvesting and Production
* Labelling
* Packaging
* Personnel Hygiene
* Pest Control
* Product Transport
* Raw Material – Ingredients
* Waste Disposal Control
* Water and Ice Quality Control
* Worker Welfare and Safety

**Draft Guidelines**

* Guidelines on Developing and Implementing HACCP Plans for Fish and Fishery Products

The Regional SPS Framework provides a detailed, but efficient and cost-effective, mechanism for reviewing and recommending Standards, Protocols and Guidelines, without displacing the role of CROSQ as the primary body responsible for the development of Standards.

Moreover, by integrating the adoption of **Protocols** into the model legislation, the process enables regionally adopted **Protocols** (which may incorporate in whole or in part any Standard) to be incorporated on a fast-track basis into national regulatory systems. The precise mechanism at the national level to achieve this is determined in the discretion of each national government (and is not mandatory – without action at the national level, the Protocols do not create legal effects). However, by integrating these documents the facility exists to incorporate regionally adopted Protocols simply and quickly, thereby alleviating the need at the national level to monitor the movement in international standards and to revise national legislation. This addresses one of the key constraints for CARIFORUM countries, that is the challenge of keeping legislation up to date with international requirements.

19 draft Protocols have been prepared, along with Guidelines on Developing and Implementing HACCP Plans for Fish and Fishery Products. The draft Protocols are designed to provide a complete system for an EU-equivalent pre-requisite and control programme. These would need to be subjected to the review process in Annex 2, before formal adoption.

## Model Legislation

Strengthening national legislation is a key requirement to improving fisheries SPS standards in the region. Model legislation has been developed, and designed to integrate directly with the mechanism for adopting regional Protocols. In short, the approach is to distil the technical requirements for fisheries SPS (specific procedures, steps, monitoring, etc.) into the Regional Protocols to be adopted once at the regional level, and then implemented many times through incorporation at the national level.

***Schematic for the model legislation***

## 

The model regulations therefore address 3 main issues:

1. **A mechanism to incorporate the Protocols into national legislation.** This can be done in one of three ways –
   1. by direct and automatic incorporation of the Regional Protocols into national legislation;
   2. by manual incorporation into a national Protocol (with or without modification);
   3. by formal transposition into national regulations (with or without modification).

The first method has the advantage of simplicity, but perhaps offers less discretion at the national level concerning implementation. A “safety net” is provided, however, which enables alternative or additional national rules to be adopted which complement or displace any regionally agreed Protocol.

1. **Licensing.** The second component concerns licensing, which is the key mechanism to implement, monitor and control the technical requirements in the Regional Protocol. Thus, compliance with the technical requirements in the Regional Protocol (or, if implemented, the National Protocol or national regulations) becomes a pre-condition for obtaining a licence and conditions for maintaining the licence.
2. **Control.** The national authorities need to be equipped with the full range of tools and powers to be able to monitor activities in processing facilities and to take action in cases of suspected non-compliance.

## National governance

Implementing and maintaining new approaches in fields such as fisheries SPS is a complex, long-term and challenging process. It presents a government with many choices and options, but also raises many challenges, such as prioritising and selecting the right options to achieve policy aims, and identifying and procuring the necessary financial, technical and human resources to implement those options.

Deciding how and when to use the functions and powers is a complicated matter – and one which can only be determined effectively with a clear strategy of what needs to be achieved, what resources are available, what mechanisms can be utilised, etc. An **implementation strategy**, as part of the overall policy framework, therefore needs to be developed to build roadmap for implementation.

A common vision, shared by all major stakeholders, at the national level is a pre-requisite to the development of a fisheries export policy, and to provide a foundation for decisions concerning implementation of regional measures and national legislation. There are several reasons why the development of a national vision and the elaboration of explicit objectives are essential:

* It is **indispensible support** to the political decision to develop (and provide government finance for) such a policy.
* A shared vision entails a process which **promotes understanding** of the importance of a country’s fisheries industry, amongst all stakeholders.
* It **highlights national issues** related to fisheries export and **brings together** all government administrations and all major stakeholders into a common process.
* It builds a common understanding on the **priorities for national fisheries policy** and on the **objectives** of integrating fisheries export policies with other sectors.

At the same time as developing a national vision, there needs to be a high-level coordination across government involving the key governmental, and preferably non-governmental, actors in order to strengthen national governance.

In this regard, the speedy implementation of a National Agricultural Health and Food Safety Agency (NAHFSA) with the consolidation of all responsibility for protecting animal health and public health, with clearly defined terms of reference, has considerable merit. It acknowledges the high priority that Governments place on food safety initiatives. The benefits that result from a single agency approach to food control include uniform application of protection measures, ability to act quickly to protect animals and consumers, cost efficiency, more effective use of resources and expertise, the harmonization of standards, the capacity to quickly respond to emerging challenges/demands of the domestic and international marketplace and the provision of more streamlined and efficient services.

The NAHFSA should be considered as a major component of the governance structure, since it is the only institution which connects all of the stakeholder groups (being the Fisheries Department, other central government departments, the local administration units of central government departments, industry stakeholders, NGOs and external stakeholders, such as regional fisheries organisations).

# Annex 1 | Memorandum of Understanding on a Regional Framework for Fisheries Trade Standards

**DRAFT Memorandum of Understanding on a Regional Framework for SPS in the Fisheries Sector**

**between**

**the CARICOM Regional Organisation for Standards and Quality (CROSQ), the Caribbean Agricultural Health and Food Safety Agency (CAHFSA) and the Caribbean Regional Fisheries Mechanism (CRFM)**

This Memorandum of Understanding is made on ......... 2015 between the CARICOM Regional Organisation for Standards and Quality (CROSQ), the Caribbean Agricultural Health and Food Safety Agency (CAHFSA) and the Caribbean Regional Fisheries Mechanism (CRFM).

**Whereas:** The CARICOM Regional Organisation for Standards and Quality (CROSQ) has been established by an Inter-Governmental Agreement amongst the Member States of the Caribbean Community (CARICOM) with an objective to develop and promote the use of standards and standards related activities to facilitate international competitiveness and the sustainable production of goods and services within the CARICOM Single Market and Economy (CSME) as well as support the expansion of intra-regional and extra-regional trade in goods and services, and

**Whereas**: The Caribbean Agricultural Health and Food Safety Agency (CAHFSA) has been established by an Inter-Governmental Agreement amongst the Member States of the Caribbean Community (CARICOM) with an objective to develop and promote the use of regional and international sanitary and phytosanitary standards, measures and guidelines as well as to facilitate the harmonization of technical procedures in relation to matters such as Good Agricultural Practices (GAPs), Good Manufacturing Practices (GMPs), Hazard Analysis Critical Control Point (HACCP), quarantine systems and surveillance and good laboratory practices and services which are internationally acceptable to conduct international trade and to eliminate the use of SPS and other non-tariff measures as deterrents to agricultural trade, and

**Whereas**: The Caribbean Regional Fisheries Mechanism (CRFM) has been established by an Inter-Governmental Agreement amongst the Member States of the Caribbean Community (CARICOM) with an objective of the provision of technical advisory and consultative services to fisheries divisions of Member States in the development, management and conservation of their marine and other aquatic resources and with functions including by developing and maintaining relations with national, sub-regional and regional institutions and bodies and international institutions and organisations involved in the regional fisheries sector, supporting efforts aimed at ensuring safe, healthy and fair working and living conditions for fishers and fish workers; encouraging the use of post-harvest practices in the fisheries sub-sector that maintain the nutritional value and quality of products; and promoting the conduct of trade in fish and fish products according to applicable agreements; and

**Whereas:** the Caribbean Community Common Fisheries Policy has among its objectives transforming the fisheries sector towards being market-oriented, internationally-competitive and environmentally-sustainable, based on the highest international standards of quality assurance and sanitary and phytosanitary systems; and

**Whereas:** the Caribbean Community Common Fisheries Policy requires CARICOM members, acting consistently with their obligations under relevant international agreements and taking into account relevant international standards on trade, marketing and SPS, to develop harmonised food quality assurance legislation, harmonised intra-regional SPS measures, common marketing standards for fisheries and aquaculture products; and

**Whereas** the Parties have agreed to enter into this Memorandum of Understanding (MOU) to reflect their mutual intention to cooperate, coordinate and combine their resources, experience and expertise to ensure proper networking between the Parties;

Now therefore the Parties hereby agree on the terms of understanding as follows:

**1 OBJECTIVES**

The objective of this MOU is to facilitate cooperation and mutual assistance between CROSQ, CAHFSA and CRFM in the discharge of their respective constitutive obligations in order to:

1. develop and implement the Regional Framework for SPS in the Fisheries Sector;
2. cooperate in the development and implementation of other regional approaches and actions in support of SPS measures in the fisheries sector;
3. enhance the action and operation of each party in the fisheries sector; and
4. avoid unnecessary duplication of efforts by any party in the fisheries sector.

**2 LEGAL INTENTION**

The purpose of this MOU is to clearly identify roles and responsibilities of CROSQ, CAHFSA and CRFM as they may relate to each other and set out the areas where both will cooperate and coordinate their activities.

Nothing in this MOU legally binds either of both Parties but is rather an expression of the individual and collective commitment to work together in order to realize the shared objectives expressed herein.

**3 GENERAL AREAS OF COOPERATION**

The areas of cooperation include the following:

**Development of regional measures**: The Parties will facilitate the development of regional approaches and measures, including the adoption of Standards, Protocols and Best Practice Guidelines.

**Regional capacity building:** The Parties agree to participate together in projects involving laboratory accreditation, conformity assessment and food safety where it is recognized that such cooperation is necessary and to the benefit of the wider business community in general and fish exporters in particular.

**Projects**: The Parties will seek to identify activities that could be jointly undertaken and if appropriate jointly financed, and agree to share widely information on projects that are not undertaken jointly.

**Dissemination of information:** The Parties will cooperate in good faith in the dissemination of information pertaining to fisheries health and food safety to stakeholders in the CARICOM Member States and extra regionally.

**International Representation:** The Parties agree to work together to strengthen the Regional Coordinating Working Groups, where they exist, and develop other such working groups aimed at coordinating Member States positions on food safety and health issues in the fisheries sector, so that can be presented in international fora such as the SPS and TBT Committees, the CAC, IPPC, OIE and ISO.

**4 DESIGNATION OF CONTACT POINT**

The Parties agree to designate a contact person to which the information necessary for the good implementation of the MOU will be communicated. Parties will notify each other promptly in case there are any changes.

The Contact Points from each organization shall for a Steering Group, responsible for overseeing the administration of this MOU.

**5 MEETINGS**

The Parties agree to meet periodically and as necessary to discuss current issues, experiences and new developments of mutual interest with respect to food safety and fish health.

The Steering Group agrees to meet ordinarily at least once in every six months, and extraordinarily at the request of any member of the Steering Group, at the times and places that they may agree.

The Steering Group will determine and regulate its own rules of procedure at meetings.

A draft summary record of each meeting of the Steering Group shall be drafted and made available online and to interested persons.

**6 ADOPTION OF STANDARDS, PROTOCOLS AND BEST PRACTICE GUIDELINES**

Without prejudice to procedures in this regards that may be specified in any legal agreement, the Parties shall cooperate in the development, adoption and implementation of Standards, Protocols and Best Practice Guidelines.

The Parties agree to adopt joint procedures for the review, consideration and potential adoption of Standards, Protocols and Best Practice Guidelines.

**7 TECHNICAL COOPERATION**

The Parties will consult and agree on how activities to be jointly undertaken should be financed while respecting their particular resource mobilisation modalities, including their own rules, regulations and procedures.

The Parties agree to share information on their respective work programs so as to determine strategic areas of cooperation as it relates to the objectives and implementation of this MOU.

Where appropriate and subject to the necessary requirements, information and documentation relating to specific projects or programmes may also be exchanged between the Parties with a view to attaining better complementary action and effective coordination between them.

The Parties may, through special arrangements, decide to act jointly in the formulation, implementation and resource mobilisation of projects that are of common interest. The special arrangements shall define the modalities for the participation of each Party in such projects and shall determine the contributions to be made by each of the Parties. Each special arrangement, undertaken under this MOU, shall make reference to it and shall include each Party’s responsibilities; duration of the special arrangements; financing; and reporting and evaluation.

**8 FINANCING**

Where there is a need for financing activities in pursuance of the objectives of this MOU, either party may offer to meet the cost or both the parties may agree to jointly meet the cost of such activities. A party retains the right to decline to provide any funds under this MOU.

**9 COOPERATION WITH NATIONAL AUTHORITIES**

The Parties will take such measures, as may be expedient, to promote the objectives of this MOU through, respectively, the national Ministries or other national administrative counterparts with which they routinely work.

**10 CONFIDENTIALITY**

Each Party shall undertake to observe the confidentiality and secrecy of documents, information and other data received or supplied on such basis to any other Party. This provision shall continue to apply to all Parties notwithstanding a withdrawal from this Memorandum of Understanding by any Party or the termination of this Memorandum of Understanding.

**11 NON LIABILITY**

Each Party shall ensure that it will not make any demand of or any claim against any other Party for any matter arising or resulting from the implementation of this Memorandum of Understanding.

**12** **EXCHANGE OF INFORMATION AND DOCUMENTATION**

The Parties agree to exchange information to the fullest extent possible on matters of common interest.

**13 DURATION**

This MOU shall be deemed to commence on the day and date of signing by the parties hereto and shall remain in effect until such time as one of the parties requests its termination.

**14 REVIEW AND AMENDMENT**

This MOU may be subject to review, modification or amendment by agreement of the Parties in writing at any time.

Either party may propose a review of this MOU at any time where need arises.

Any revision, modification or amendment agreed to by the parties shall form part of this MOU. Such revision, modification or amendment shall come into force on such date as may be determined by the Parties.

**15 TERMINATION AND WITHDRAWAL**

This MOU may be terminated by any party upon giving the other Parties one month’s notice of its intention to terminate this MOU.

IN WITNESS HEREOF, the undersigned, being duly authorized thereto, have on behalf of the Parties hereto signed two originals of this MOU in English at the place and on the day below written…

# Annex 2 | Regional Standards Review Process

**[A] Introduction**

This document has been developed in the context of the Caribbean Regional Framework for Fisheries SPS. It sets out a region-wide Review Process for submitting and recommending proposed Standards, Protocols and best practice Guidelines (hereafter SPBPG) for fish and fishery product hygiene practices. The process is without prejudice to any other systems for adopting SPBPG that may be operated by any regional organization or national government.

This Review Process applies both to the development of specific (bespoke) regional SPBPG – in particular those that may acquire legal effects within the regional framework – and to the adoption at the regional level of SPBPG adopted by international or national standard setting bodies or other international, governmental or non-governmental organizations.

The SPBPG that are recommended by this Review Process are intended primarily for use within the Caribbean, as implementation of the Caribbean Regional Framework for Fisheries SPS. However, the Process can also be applied to the validation and recommendation, at the regional level, of SPBPG adopted by other international bodies that can be adopted region-wide by Cariforum Members. Alternatively, if SPBPG that are proposed or developed that have wider applicability than within the OECS, they may be submitted to CROSQ for recommendation at the Caribbean level through its official procedures, or to appropriate international standards bodies, such as ISO.

**[C] Process Overview**

The overall process is presented in figure 1 (left) and is overseen by a **Steering Group (SG)**. There are a number of steps in the process and a number of individuals and groups that have roles to play. These individuals and groups, and their roles and responsibilities are described below.

**[B] Review Stages**

**Stage 1: Submission of Proposal**

A proposal for presentation to the SPBPG Review Process can be prepared by any Member State, Member Organization or, upon the invitation of the Steering Group, any other public or private organization with an interest in the fisheries and fisheries trade sector.

The scope of proposals should be related to fisheries and marine resources sanitary and phytosanitary procedures and/or good fisheries production hygiene or trade practices. As such, this would include SPBPG covering:

* pre-requisite programmes;
* HACCP;
* GMP, GAP;
* validation and assessment procedures.

In order for a proposal to be considered, it must be sent to the **Secretariat** and be prepared using the template provided in the Appendix. If a proposal is not compliant with the template then it will be returned to the proposer(s).

Once submitted, the **Secretariat** will notify the members of the **Steering Group** and initiate a review process, if appropriate.

The **Steering Group** will agree a timetable for conducting the internal review and will inform the proposer(s).

**Stage 2: Internal Review**

The internal review will be initiated by the **Steering Group**. Members will read the proposal and respond with comments (it is recommended that this is done within **15 calendar days** of the review starting, but alternative timetables can be established). Responses will be collated and reviewed by the **Steering Group**.

The purposes of this stage are:

1. **To ensure that the proposal is complete and fully informative of what is being proposed**. If information is lacking or the proposal is unclear, the proposer(s) will be contacted and provided with comments about what changes are deemed necessary.
2. **To determine**, taking into account the document type, **whether the document should be reviewed within this mechanism**.

*Part a)*

This first part of the review will examine the proposal and consider such questions as:

(i) Is the purpose of the standard well defined and clear?

(ii) Is their sufficient detail in the proposal to allow for an expert review?

(iii) Is the proposal clearly written and complete?

(iv) Are there any obvious weaknesses?

(v) Is there another competing potential standard that has equal merit?

(vi) Does this proposal address a pressing issue at this time?

(vii) Can the standard be applied widely by Cariforum Member States?

(viii) Is the information backing the proposal more suitable for the catalogue of best practices?

(ix) Is the proposal suitable for a fast track approach?

Criteria to consider include:

* Does the proposal recommend the application of an existing international standard?
* Is the proposed standard already a de facto standard with very broad use?
* Are there reasons that justify a very rapid consideration of the proposal?

*Part b)*

This second part of the review (b) will determine how the proposed document should be treated within this review mechanism. This depends on what type of document is being proposed:

* If the document is a proposed **Standard**, it will be for CROSQ to determine whether it wishes this mechanism to be used in conjunction with its own procedures or whether it wishes to use its procedures exclusively.
* If the document is a proposed **Protocol**, it will be for the Steering Group to determine whether the content and nature of the document is of sufficiently clear, specific and normative character to be capable of defining regulatory requirements. If this is determined negatively, the Steering Group may either return the document to the proposer(s), in accordance with the procedures below, or may recommend the document be considered as **Guidelines**.
* If the document is a set of **Guidelines**, it will be for the Steering Group to determine whether the content and nature of the document is sufficiently relevant, technical and clear so as to be capable of providing guidelines at the regional level.

Note: Some proposals may be considered as too limited in scope to achieve regional acceptance. In spite of this, the proposal may have a strong basis in experience and support from a select group. The Internal review may decide that the documentation behind the proposal (the details of operations, processes, etc.) is nevertheless a valuable asset to be given wider exposure. In this event, the proposer(s) will be invited to submit the background documentation to be included in the **catalogue of best practices**. By doing so, they will be exposing their practices to groups that are using the catalogue to improve their internal operations and may find such documentation helpful.

Based on comments received, the proposer(s) will receive notification of one of the following actions:

i. the proposal will be moved to **SUBMITTED**status (stage 3)

ii. the proposal requires amendment; collated comments of the internal review will be provided

iii. the proposal will not be considered at this time

iv. the proposal will not be considered at this time but author(s) are invited to provide background documentation for the ***catalogue of best practices***

v. the proposal will be reviewed as a draft Standard under CROSQ procedures.

For proposals that require amendments, proposer(s) should be given a time limit to respond with a changed proposal. Once re-submitted, the proposal will once again go to internal review and either receive support to proceed to Stage 3 or be dropped.

Once the internal review has been completed, the proposal will be published online.

**Stage 3: Expert Review**

Moving a proposal to Expert Review changes its status to **SUBMITTED**.

The first action taken by the Steering Group is to identify a **Moderator** for the review. This person will be someone with sufficient familiarity with the subject of the proposal, but with no strong affiliation with the author(s). The role of the Moderator is to:

* guide the review of a standard through the review process
* ensure that all discussions reach a conclusion and, as possible, consensus
* report progress and final outcome of a review to the Steering Group
* assemble the expert review team, with assistance of the Steering Group

The **Moderator must identify and recruit members of the expert review team to examine the proposal**. This should be done with the help of the Steering Group. Members may be drawn from regional and international organizations, from national administrations in the region, from laboratories or academic institutions or from other individuals with sufficient knowledge to contribute, including sufficient knowledge of the regional context. The role of the Expert Review Team (ERT)is to:

* develop a set of criteria by which the proposal will be evaluated
* discuss the proposal and evaluate it according to the established criteria
* decide if the proposal meets the criteria, or whether revisions should be recommended, or the proposal is not suitable but should be considered for the catalogue of best practices, or the proposal should be rejected
* assist the Moderator in preparing the report to be provided to author(s) and the Steering Group.

The Moderator and the expert review team will work together to **develop appropriate criteria**for the review. These will be used to guide the discussions.

The Steering Group will establish an on-line forum for discussions of the expert review team. This forum will be password protected and discussions will not be made public.

The review will be conducted as expeditiously as possible. During the course of the review, the expert review team may ask the Moderator to contact the proposer(s) to clarify aspects. These exchanges should be minimized since if they become too frequent, it is an indication that the proposal has not been written clearly enough.

The Moderator should provide **a brief monthly report to the Steering Group**. This report should summarize progress in the review and indicate what is left to do. The Moderator may poll expert review team members at any time to determine if the proposal should pass to **PROPOSED** status (Stage 4). If the proposal achieves at least 75% support of respondents, the Moderator will recommend to the Steering Group that the proposal status be changed to **PROPOSED.** The Steering Group members will provide a response within 5 calendar days.

At the end of **3 calendar months**, if no decision has been reached by the expert review team, a poll of expert review team members will be taken. If there is sufficient support of members that favour the proposal the recommendation will go to the Steering Group to move the proposal to **PROPOSED** status.

If support is insufficient, the Moderator will write a review of the discussions and provide this to proposer(s).

The proposer(s) will be given a period of **1 calendar month** to address the shortcomings. The revised proposal will be passed back to the expert review team for further consideration. If not enough support is garnered in a subsequent poll, the Moderator will summarize the shortcomings and report to the proposer(s) and the Steering Group. The SG will decide if:

* another revision will be invited (with a new version number) and this will restart the Expert Review
* the proposal will be dropped
* the proposal will be dropped but author(s) are invited to provide background documentation for the **catalogue of best practices**.

At the end of this step, the Steering Group will close the internal forum and archive the discussions. The Moderator will dissolve the expert review team used in the internal review. The Steering Group will place the comments concerning the proposal on the appropriate pages of the standards process web site maintained by the Steering Group and associated with the proposal. The outcome of the review will be clearly indicated.

**Stage 4: Stakeholder Review**

Moving a proposal to Stakeholder Review changes the status to **PROPOSED.** This stage opens discussions up for wide community comment.

At this step the Steering Group will undertake the following actions:

(i) Open a **public, on-line forum for discussion of the proposal.**

(ii) Use methods such as Circular Letters, emails, notices on web pages and other communications means to notify relevant stakeholders (public and private sector) that the SPBPG has been proposed.

(iii) Provide the login information and invite comments for a period of 3 calendar months.

(iv) Invite Cariforum Member States to initiate national consultation procedures, as appropriate.

The**Moderator, appointed for the Expert Review (Stage 3), will continue to guide the review during the public discussion**. The Moderator’s role is to foster discussion and evaluation and ensure that the discussions are clearly aware that the standard is targeted for ease of data exchange and interoperability and not to alter internal data systems of the agencies and projects. The Moderator should refrain from detailed explanations of the proposal since if this is required, it means the proposal is not clearly written or defined. **The moderator should clearly spell out the criteria that should be used by stakeholders to review the proposal.**

Following completion of the public discussion, the Moderator will prepare a report summarising the discussions and, based on those discussions, make one of the following recommendations:

1) that the proposal be accepted

2) that the proposal should be returned to the proposer(s), along with the comments and an invitation to resubmit a modified proposal

3) to cease further consideration of the proposal in which case the proposer(s) will be provided with the comments and decision. The Steering Group may invite proposer(s) to provide background documentation for the **catalogue of best practices**.

4) to suspend the proposal. Reasons for doing so may include that there has been insufficient testing performed, or that the proposal, though sound, needs more clarity. The Moderator will work with the proposer(s) to improve the description, or identify means to conduct further tests.

If a proposal is revised, the revised proposal will be re-submitted to the beginning of this stage.

At the end of this step, the Steering Group will close the public forum and archive the discussions. The Steering Group will place the comments concerning the proposal on the appropriate pages of the standards process web site maintained by the Steering Group and associated with the proposal. The outcome of the review will be clearly indicated.

**Stage 5: Recommendation and Ratification**

The Steering Group is responsible for preparing the draft recommendation to go to Cariforum Member States for ratification.

Pending ratification, the Steering Group will:

1) use methods such as Circular Letters, emails, notices on web pages and other communications means to notify regional stakeholders that the SPBPG has been recommended.

2) provide the URL where information about the SPBPG can be found.

In order to be accorded the status of **RATFIED**, the proposal requires the acceptance of at least 75% of Cariforum MS.

Once a SPBPG is accorded the status of **RATIFIED** under this Review Process, all Cariforum Member States and all concerned stakeholders are encouraged to implement the recommended SPBPG. The Steering Group will:

1) prepare for the publication of the standard, and issue this once it has been ratified;

2) invite all Cariforum MS to implement the recommended standard as soon as feasible;

3) establish a registry where MS can indicate when and in what circumstances they have achieved compliance with the recommended standard;

4) determine if there is a need for ongoing maintenance of the standard, such as would be the case for controlled vocabularies for example. If this is the case, the Steering Group will consult with the proposer(s) of the proposal to identify who will be responsible for this task.

**[C] Meaning of “Ratified”**

By definition, Standards and Guidelines are not mandatory. Protocols are intended to have mandatory effects, but do not create mandatory effects in their own right. A recommended Protocol may be codified through contractual, administrative, legislative measures or through international agreements.

**Appendix A | Template**

|  |
| --- |
| **Template Guidance** The Proposal template contains ten main elements and provides content descriptions for each.   Proposals may be comprised of a single item (vocabulary, operating procedure, etc.) or multiple items     If a series (multiple items) is proposed having a common purpose and justification, a common Proposal may be drafted including all elements to be clarified and enumerating the each individual item.   Consider this template as a cover sheet to the more comprehensive materials associated with the Proposal. |

**Title**: *Provide the full title of the proposed document.*

**Publication type**: Briefly describe the target audience for this Proposal and any outreach plans to be considered.

**Proposal version**: Define version of proposal if proposal was amended during evaluation process early (for example, v.1, date).

**Subject:** *Provide an indication of the subject, scope and purpose of the Proposal*

**Scope**: *Provide a clear indication of the extent of the Proposal’s application.   Identify any specific processes, products or conditions to which the Proposal could apply. Indicate any known limitations or exclusions where the Proposal is not adequate*.

**Purpose and Justification**: Provide details based wherever practicable.

1. Describe the specific aims and reason for this Proposal, with particular emphasis on the aspects of standardization covered, the problems it is expected to solve or the difficulties it is intended to overcome.

2. Describe how this proposed SPBPG food hygiene, SPS, trade/export, etc.  When applicable include mention of what international standards or requirements the proposal supports.

3. Describe the main interests benefitting from or affected by the proposed standard, such as industry, consumers, governments, distributors.   Identify any relationships and/or dependencies.

4. Describe the feasibility of implementing the proposed standard.   Include any factors that could hinder the successful establishment or regional application of the Proposed standard.   Are there any associated issues?   Identify resource implications resulting from the recommendations.

5. Considering the needs of other fields or organizations, indicate the timeliness, target date(s), or if proposing a series of standards, suggest priorities.     List any statutory requirement or other driving factors.

6. Describe the possible benefits gained by the implementation of the proposed standard. Alternatively, describe the loss or disadvantage(s) if no standard is established within a reasonable time.

7. Indicate whether the proposed standard is or may become the subject of regulations or may require the harmonization of existing regulations.   Describe any impacts of this activity.

**Current Operational Implementations**: Provide information about organizations, programs or projects which currently use the Proposed standard as part of an operational environment.   If there are none, please indicate organizations that are testing the standard.

**Relevant Documents**:

1. Provide the reference(s) to all documents or materials associated with this Proposal (e.g. standards, specifications, regulations). Where Proposals comprise multiple documents or files, include a brief description of the relevancy of each as well as any dependencies among these materials.

2. Attach copies of all relevant documents or materials to this proposal.   Where copyright policies restrict the attachment of the documents, indicate these by providing a listing along with the resource through which these documents may be obtained.

**Cooperation and liaison**:

1. Existing Community: List relevant organizations, bodies, work groups or related projects which currently use the Proposed standard and through which cooperation and liaison could be extended to the broader community.   Include organizations, programs, etc. supporting the submission of this proposal.

2. Expanded Community: List relevant organizations, bodies, work groups or related projects not currently employing the Proposed standard and with which cooperation and liaison should exist.

**Contact information**: Provide the contact information of the Proposer.   This individual acts as the key point of contact for interaction with the Steering Group on this proposal. Include the Proposer’s name, organization, email address, and telephone number.

**List of Acronyms**: Define all acronyms used.

**Other Attachments**: Provide a listing of any additional attachments to this Proposal.   Attachments many include letters of endorsement, technical reviews, lessons learned documents, etc.

# Annex 3 | Developing National Governance

Implementing and maintaining new approaches in fields such as fisheries SPS is a complex, long-term and challenging process. It presents a government with many choices and options, but also raises many challenges, such as prioritising and selecting the right options to achieve policy aims, and identifying and procuring the necessary financial, technical and human resources to implement those options.

Where Governments are implementing new regional measures or even new national legislation, the Government will often by disposed with a significant range of functions, powers, duties and objectives but in many respects will have to specifiy for itself how these are to be carried out or fulfilled. Deciding how and when to use the functions and powers is a complicated matter – and one which can only be determined effectively with a clear strategy of what needs to be achieved, what resources are available, what mechanisms can be utilised, etc. An **implementation strategy**, as part of the overall policy framework, therefore needs to be developed to build roadmap for implementation. These guidelines outline the key steps in the first stages of developing an implementation strategy.

### (1) Developing a strategic vision

The first step in developing an implementation strategy, is to establish a national vision for fisheries exports. In other words, before starting a journey, you need to know where you are going.

A common vision, shared by all major stakeholders, at the national level is a pre-requisite to the development of a fisheries export policy, and to provide a foundation for decisions concerning implementation of regional measures and national legislation. There are several reasons why the development of a national vision and the elaboration of explicit objectives are essential:

* It is **indispensible support** to the political decision to develop (and provide government finance for) such a policy.
* A shared vision entails a process which **promotes understanding** of the importance of a country’s fisheries industry, amongst all stakeholders.
* It **highlights national issues** related to fisheries export and **brings together** all government administrations and all major stakeholders into a common process.
* It builds a common understanding on the **priorities for national fisheries policy** and on the **objectives** of integrating fisheries export policies with other sectors.

The vision underlies all fisheries export policies, strategies and regulation. It basically expresses a political will: it defines what the country does and does not want, and which way these objectives should be pursued in the long-term. This reference should be common to all national concerned stakeholders, be they public or private.

The creation of a national vision for the fisheries export sector entails a comprehensive and inclusive process, to be conducted amongst all concerned administrations and in partnership with the major stakeholders. It is an iterative process (the national vision should be periodically reviewed and adapted, based on a proper evaluation process) and can be developed as knowledge, capacity and ambitions develop.

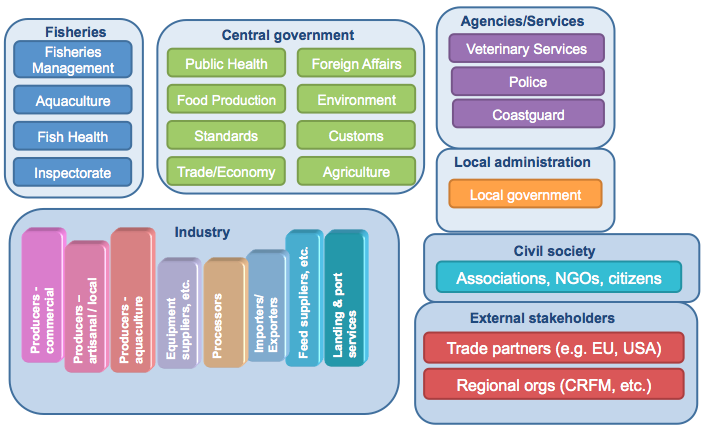
There is no single approach concerning what a national vision should contain, nor a common recommended methodology as to how one should be developed. In short, the vision should provide a realistic, credible and motivating representation of the future.

The two major elements should include:

* **General objectives and priorities**, as the main political statement of a country’s intentions and goals for the fisheries sector.
* **Common principles and guidelines,** to ensure consistency and common aims in each sectoral or thematic strategy.

### (2) Governance

In practical terms, the implementation of regional measures and national legislation (and everything that supports that – national vision, policies, strategies, etc.) needs to be coordinated, driven and realised by decisions at the governmental level. There needs to be a high-level coordination across government involving the key governmental, and preferably non-governmental, actors.

In this regard, the speedy implementation of a National Agricultural Health and Food Safety Agency (NAHFSA) with the consolidation of all responsibility for protecting animal health and public health, with clearly defined terms of reference, has considerable merit. It acknowledges the high priority that Governments place on food safety initiatives. The benefits that result from a single agency approach to food control include uniform application of protection measures, ability to act quickly to protect animals and consumers, cost efficiency, more effective use of resources and expertise, the harmonization of standards, the capacity to quickly respond to emerging challenges/demands of the domestic and international marketplace and the provision of more streamlined and efficient services.

The NAHFSA should be considered as a major component of the governance structure, since it is the only institution which connects all of the stakeholder groups (being the Fisheries Department, other central government departments, the local administration units of central government departments, industry stakeholders, NGOs and external stakeholders, such as regional fisheries organisations).

Consultation is a **critical component** of the legislative process. It is important that governments understand who their stakeholders are, develop regular processes to engage with the key stakeholders and build the capacity to communicate with the wider stakeholder community where possible.

Whilst final decisions concerning policy and implementation of fisheries export measures and rules rest with Government, is important that decisions reflect both the knowledge and aspirations of fisheries sector participants and other stakeholders and the ability of the fisheries industry to comply with and follow the rules. Without this industry consultation, policy or regulations may lack validity and may fail to reflect the ambitions and concerns that are required to ensure future ownership and legitimacy.

It is important therefore to consult regularly and to consult properly with stakeholders. It is important that consultation processes are conducted at a suitable scale to reflect the existing and emerging industry structure, and be conducted in a manner that ensures that feedback is adequately reflected in the developing decisions. Communicating with stakeholders can be achieved through a number of means, in addition to formal channels such as the NAHFSA. These include: face to face meetings (e.g. personal meetings with key individual stakeholders); group meetings (e.g. community meetings or consultations); internet; workshops, etc.