Minimizing Food Safety Concerns with Aquaculture Products: The Malaysian Case Study

Dr. Shahridan Faiez & Padmini Nagalingam
Contents

1. Malaysia’s Growing Aquaculture Scene
2. Findings of EU Visit in 2005 and 2008
3. Unilateral EU Export Ban in 2008
4. Improvements to Food Safety Regulations
5. Findings of EU Visit in 2009/2010
6. Conclusion
Malaysia’s Aquaculture Scene

- Annual Growth Rate of almost 10% since 2000.
- The Malaysian seafood industry is now the 2nd largest food export industry in Malaysia with a total export value of over MYR 2.5 billion annually.
- The EU market is the preferred export market for Malaysian seafood because of the higher premiums available.
Findings of EU Visit 2005 & 2008

- The Directorate General of Health and Consumers (D.G. Sanco) visited in 2005 after the harmonization of the EU members import conditions.
- Food supply chain controlled by 3 agencies
  - Food Safety and Quality Division (FSQD), Ministry of Health (MoH)
  - Department of Fisheries (DoF), Ministry of Agriculture
  - Fisheries Development Authority (LKIM), Ministry of Agriculture

<table>
<thead>
<tr>
<th>MoH</th>
<th>DoF</th>
<th>LKIM</th>
</tr>
</thead>
</table>
| ➢ Central competent authority  
➢ Directly responsible for public health in this matter.  
➢ Control of potable water supply falls within competence of MoH. | ➢ Competent authority directly responsible for animal health matters in this area. | ➢ Competent authority for issuing the license that allows a company to carry out the activity of import/export of live fish or final product (fishing vessels) |
Findings of EU Visit 2005 & 2008

Main Problems Identified:

➢ No specific legislation was in place to ensure that fishing vessels and landing sites are in line with EU standards.
➢ The HACCP programme was not a prerequisite for an establishment to be proposed for the EU export list.
➢ No generic approval of a farm for export, those wishing to export must ask for registration with the Animal Health Quarantine Centre of the DoF.
➢ Laboratories involved in testing were not adequately equipped and staff were not knowledgeable enough.
➢ There was a need to implement minimum hygiene standards in processing plants, fishing vessels and landing sites.
Findings of EU Visit 2005 & 2008

- All observations were made in 2008 and recommendations were made to improve the situation by the next visit in 2008.
- In 2008, the D.G.SANCO founds that most of the recommendations from previous mission report have not been addressed.
- It was concluded that all official controls put in place by the Malaysian Competent Authority were not equivalent to the EU requirements for imports of live fish and finished products.
- EU were contemplating imposing a ban which would be then gazetted into a law. This decision would be harder to reverse.
- This led to the Malaysian Competent Authority to impose an immediate unilateral export ban to the EU.
Impact of Unilateral EU Exports Ban

- 45 processing establishments and one freezer vessel lost their licenses/EU numbers to export to the EU immediately.
- Processing plants who had shipments on their way to the EU and also in process had to appeal for a gestation period to fulfill these orders.
- There were ready stocks for the upcoming EU festive seasons (Christmas and New Year) that had to now be reprocessed and repacked for other countries.
- The immediate loss ranged in the millions to billions of Ringgit for both exporters and importers.
- Half of the processing plants in the country shut down and many lost their jobs overnight.
Improvements to the Food Safety Regulations

- New Regulations Enacted.

1. Food Hygiene Regulation 2009
   - Health Certificates need to be issued for all relevant parties involved in finished product heading for the EU.

2. Fisheries Regulations 2009
   - Fishing vessels and aquaculture farms have to get quality control certification for seafood that would be processed into finished product for the EU.

3. Lembaga Kemajuan Ikan Malaysia Regulations 2010
   - Hygiene and recognition of fish landing sites approved for raw material heading to the EU.

4. Fish Marketing Regulations 2010
Improvements to the Food Safety Regulations

- Implementation of Food Export Certification Information System to make sure that exports of fishery products are from approved establishments and processed from raw materials obtained from approved sources.

<table>
<thead>
<tr>
<th>MoH</th>
<th>DoF</th>
<th>LKIM</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Middlemen/Transporters</td>
<td>• Aquaculture farms.</td>
<td>• Landing Sites</td>
</tr>
<tr>
<td>• Processing Plants</td>
<td>• Fishing Vessels</td>
<td></td>
</tr>
<tr>
<td>• Sources of Imported Raw Material</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Water and Ice Sources</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Findings of EU Visit 2009 & 2010

- The D.G. SANCO was reluctant to visit in 2009, believing that it was too short a time for Malaysian Competent Authority to clean up their act.

- They were surprised to find controls for aquaculture farms and exporting processing establishments were in general equivalent to EU requirements.

- This led to 6 processing plants being listed in 2009 and a further 8 processing plants being listed in 2010.

- 15 fishing vessels were relisted in 2010.
Conclusion

- It is possible to turn around a system within a short time.

- There will still be some weakness in the implementation, especially when enforcing new regulations nationwide.

- Currently, not all processing plants are required to adapt HACCP or any of the other certifications required to export to EU. There are still processing plants that are below the standard but not exporting.

- How do we make the various parties take interest into getting themselves certified and up to standard with the rest of the world?
Conclusion

➢ The Malaysian Competent Authority is heavily dependent on the effectiveness of the public sector. This is not a safe assumption.

➢ Malaysia needs to explore using 3rd party certification systems that can complement the system established now by the Malaysian Competent Authority.