

# Aquaculture products from India

Border veterinary control problems

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## 1. Commission Decision number 2010/381/UE

Till September 2016, according to Commission Decision number 2010/381/UE, 20% of imported containers with aquaculture products (shrimps and fish) from India intended for human consumption, were tested on limits of pharmacologically active substances like nitrofurans, chloramphenicol and tetracyclines.

## 2. Commission Implementing Decision number 2016/1774

Since October 2016, according to Commission Implementing Decision number 2016/1774, the level of samples tested on limits of pharmacologically active substances was increased to 50%.

# Control of 50% of imported aquaculture shrimps and fish from India in every veterinary border control point

In practice that means, that each Veterinary border control point collects samples from every second container. For an importer, in extreme cases, this means, that at the same moment there may be stopped 4 containers dedicated to 4 different destination ports (we send our containers to Szczecin, Gdynia, Gdańsk and Hamburg).

## **PROPOSAL OF SOLUTION**

Veterinary border control points, using the integrated computerized TRACES system, have an overview of all tests results in whole EU. Consequently, why 50% of containers are checked separately for each border inspection point and can not be counted at all control points in whole EU, or if not, at all control points of each country? The control would still cover 50% of containers, but counted comprehensively in whole Union or in each country.

# Huge additional control costs, which are all covered by the importer

The waiting time for the tests results (in Poland) is about 10 calendar days. Reefer containers have different free of demurrage time, depending on shipping line – 3-7 days. After this time demurrage costs are 30-100 EUR per day (depending on shipping line). Additionally, there are extra freezing costs of the container waiting in the port e.g in D Gdansk it is 27 EUR per day calculated from second day. It gives us a total cost which is about 300-900 EUR per container.

The cost of veterinary tests on pharmacologically active substances in Poland is about 700 EUR

Summing up - for each controlled container the importer will cover an additional cost about 1000-1600 EUR

## **PROPOSAL OF SOLUTION**

If 50% would be counted on all control points in a country or in whole EU, then the costs per importer would also be reduced. Containers stopped for specialist testing may be discharged to a customs warehouse under veterinary and customs control, where the goods may await the results without incurring unnecessary demurrage and freezing costs.

# Potencial problems with future purchasing from India

An additional problem is, that Indian exporters, having an option in the huge Chinese consumers market, are not interested in export their products to Europe. Although practically 100% of inspected containers are positively tested, export to the EU is currently at the highest risk (sometimes importers try to forward part of the costs of the tests to the exporters). As a consequence, this can bring the huge deficiencies in these products in Europe or a very rapid increase of their purchase prices.

## **PROPOSAL OF SOLUTION**

Big factories (processors) do a lot of tests during processing and before shipment, to be sure that their product checked in the EU will be safe. With such a large scale of production they can not afford such a risk. Therefore, if a factory number is additionally tested at border control points and the results are correct, eg 10 times (one by one), the limit of additional tests may be reduced to 20% for this plant number. I am sure that such a solution would be a huge motivation for producers in India to maintain a constant high quality and safety of their products.