



Seafood Inspection Program
U.S. Department of Commerce
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USA



3-Aug-11

For: All U.S. Seafood Exporter to the People's Republic of China

Subject: Summary of the meetings between NOAA Fisheries and the Animal Plant Quarantine Inspection Service (AQSIQ) of the People's Republic of China (PRC).

Discussion Regarding General Fish and Fishery Products Issues:

Format of the China Seafood Health Certificate

Recently, there have been problems in some of the ports of entry to PRC concerning which published format of the U.S. fish and fishery products health certificate that AQSIQ requires for importation. Two of the Seafood Inspection Program (SIP) regions were using a 2005 version while the third was using an earlier 2003 version that SIP had a reasonable belief was superseded by the 2005. We asked AQSIQ to verify which version was the correct one. The officials replied that the 2003 version was the correct certificate as the 2005 version was withdrawn because the Chinese characters were not accurate.

Notification 9-2011 (Requirement that wild-caught salmon shipments identify the vessel registration number)

NOAA officials explained that this requirement could not be met for the salmon shipments because of the complexity of the fisheries where thousands of boats fish and off-load their catch to refrigerated tenders which are comingled. The tenders deliver the fish to the processing facility where they are often further comingled. Furthermore, some commercial salmon fishing does not involve vessels. Some are caught in beach seines or gill nets or traps and are delivered to the processing facility by truck. After an intense discussion, it was agreed that SIP could use Vessel Registration Facility numbers for each firm that ships salmon products to the PRC. SIP has created a numbering system and all shippers of salmon now have been assigned this number which will appear on the health certificate on the third line of section I. Furthermore, each firm location will keep an inventory of the vessel names and registration numbers that provided salmon to PRC for consumption or further processing that SIP can view and audit for accuracy.

New Prior Notification Requirement

In recent weeks there has been a persistent rumor that AQSIQ is now requiring one month prior notice for entry of fish and fishery products to PRC. We inquired about the veracity of this rumor and the officials we met with had no knowledge of it so this appears to be only a rumor. SIP has an employee that is fluent in Mandarin Chinese who looked at the web site of the

organization that supposedly was requiring prior notice, but could not find any evidence that it was a governmental site.

Memorandum of Agreement (MOA) between SIP and AQSIC

AQSIQ officials requested that the Seafood Inspection Program and AQSIC continue to pursue the MOA that was being developed up to two years ago. Given the importance of trade in seafood products SIP also wants to develop a closer working relationship in order to understand Chinese requirements and to facilitate trade.

Other topics

We ran out of time to cover the topic of triangular trade between the U.S., China and the European Union. We agreed to discuss this by email.

NOAA proposed that we convene another meeting at the Qingdao Seafood Show in November.

Fish Meal Discussion:

In 2007 PRC Issued a notification entitled “Hygiene and Quarantine Requirements of the People’s Republic of China for Imports of Fish oil, Fish Meal and Other Aquatic Animal Proteins”. AQSIC had not stopped trade with the U.S. because we had been “traditional suppliers” of fish meal and had a very good record of product safety. NOAA Fisheries requested several clarification of this new regulation. However, AQSIC now wished to impose a deadline by December 1, 2011 for the U.S. to be in compliance.

Here is a summary of this discussion:

Application Process

AQSIC will provide an application questionnaire to begin the process. (The questionnaire was given to us late last week.)

Registration

This will be required and NOAA SIP will maintain a China Fish Meal and Fish Oil Shippers List.

Health Requirements

HACCP or a HACCP-like approach will be required.

Since all of U.S. production comes from wild-caught product, no testing for aquaculture drugs will be required.

AQSIC has done a scientific study and concluded that time-temperature requirements for fish meal will be 85 degrees Centigrade for at least 15 minutes.

Facilities must have a plan in place to prevent re-contamination of fish meal by certain pathogenic microorganisms.

Some analytical testing for chemical contaminants will be required although we may rely on monitoring currently conducted by FDA Center for Veterinary Medicine Division of Animal Feed. Melamine testing should not be necessary.

PCR testing for Bovine residues will be required.

A *salmonella* test will be necessary for each shipment and regular audits (three times per year) will suffice for the in-plant inspection.

AQSIQ requires specific labeling requirements that will be provided to industry. Shippers may label packaged fish meal or sent labels with a bulk shipment.

A certificate for fish meal and fish oil will be required for all shipments but can be signed by a SIP inspector under the direction of a veterinarian. The certificate will be designed by NSIL/SIP, approved by AQSIQ and go into effect to meet the deadline of December 1, 2011.

AQSIQ has asked to do an audit of the U.S. fish meal producers that ship to China in November, 2011.