EU Import controls related to food, animal products and plant products

Lebanon
2016
The EU Market

The EU is a Success Story

- 60 years peace, shared values, compromise
- Single Market with 500 Million citizens
- Economic stability, 70% of trade intra-EU
- Harmonisation of rules and standards

The EU is a nightmare

- 28 countries, 24 official Languages
- Diverse traditions, expectations and economies
- By far the biggest importer and exporter of food worldwide

Risks must be managed
Risks to be managed:

- **Contagious animal and plant disease** (FMD, Avian Flu, Citrus Canker)
- **Zoonoses** (transmitted from the animals) (Salmonella, Listeria, BSE, Tuberculosis)
- **General hygiene**
- **Contaminants** (Pharmaceuticals, pesticides, heavy metals)
- **Fraud**
How does it work?

- Harmonized legal framework;
- Efficient risk management;
- Transparency, information exchange and constant evaluation/peer pressure;
- Scrutiny and market surveillance, border controls, audits.
The food sector is one of the most regulated and harmonised at EU level (almost 98%).

THE ENTIRE FOOD CHAIN "FROM FARM TO FORK"

**FARMERS**
- Animal Health
- Animal Welfare
- Seed (GMO)
- Plant Health
- Pesticides
- Feed

**INDUSTRY**
- Hygiene
- Contaminants
- Additives
- Packaging
- Dietetic Food

**CONSUMERS**
- Labeling
- Claims
- Transparency
- Traceability
Food safety in the EU

The new regulatory framework is based on a coherent and comprehensive approach:

- “Farm-to-table” – traceability
- Risk assessment based on best available science (EFSA)
- Risk management – precautionary principle
- Consultation of stakeholders – access to information
- Clearly assigned responsibilities (producers – officials)
- Equal treatment of domestic producers / importers
- New emphasis on enforcement
- New emphasis on communication (guidance documents)
- New emphasis on training (“Better Training for Safer Food”)
General Food Law (Reg 178/2002)

**Article 17 – Liability**
All operators must ensure safety of food and feed.

**Article 18 – Traceability**
All food, feed and animals: One step up, one step down.

**Article 20 – Recall**
All recalls must be reported to authorities.

**Article 11 - Imports**
Food and feed imported into the Community complies with food law or conditions recognised as equivalent.

**Article 12 - Exports**
Food and feed exported shall comply with the food law.
Official Food and Feed Control

Regulation 882/2004

- Coherent principles for all authorities:
  Adequate staff, resource, training.
  Accredited labs, international standards.

- Risk-based controls in all sectors (Competent Authority)
  Based on multi-annual plans.
  Control plans are subject to scrutiny.
  Coordinated residue monitoring programs.
EU food law in a nutshell

All Member States:
- Credible inspection and control system.

All food and feed:
- Liability, Traceability, Reporting.
- General hygiene rules.
- Self-controls by producers themselves.
- Residue monitoring

High risk products
- Specific hygiene rules.
- Animal health and plant health.
Imports – Same rules apply

**Food of animal origin (high risk)**
- Lists of eligible countries and businesses.
- Country listing after inspection by FVO.
- Regular country audits on risk basis.
- Approval based on compliance or equivalence.

**Food of non-animal origin (low risk)**
- No country listing.
- Importer is liable for safety (general food law).
- Specific rules in particular cases (citrus, potatoes).

*The EU is NOT dealing with individual businesses. National services must guarantee compliance.*
Country Listing: Food of animal origin

- Must have Competent Veterinary Authority in-line with Regulation 882/2004.
- Must have animal health/zoonoses requirements met.
- Approved businesses meet EU hygiene requirements and are regularly inspected.
- Monitoring system for residues in place.
- Confirmatory inspection of the Food &Veterinary Office.
- Official Certification agreed.
- Member States agree.
Plants, Fruit, Vegetables

• No country listing, no business listing.

• Plant Health requirements.

• Residue tolerances must be met.

• Entry via any border post (unless specific rules apply).

• Importer is responsible and liable.
Hygiene: Food of Animal Origin

Regulation 853/2004
Specific rules for food of animal origin;
Covers all stages of production including farms;

Operators need **authorization**;
**Authorization only after inspection**;
**Listing of authorized businesses.**
Residue Monitoring

Food of animal origin (Directive 96/23)

- Meat, poultry, game, aquaculture, milk, eggs, honey;
- Member States and exporting countries must submit a rational monitoring plan;
- Reviewed by FVO.

Food of plant origin (Regulation 396/2005)

- Rules for setting Import Tolerances
- Harmonised monitoring programs in Member States;
- Results collected by EFSA;
- Rapid Alert Notification if exceeded.
Risk management - in case of problems

- *Rapid Alerts trigger a letter to competent authority with a request to follow-up and report back.*

- **Additional Measures:**
  - Entry through designated points,
  - Increased checks;
  - Pre-export checks and certification;
  - De-listing of establishments or countries.
It does not matter whether or not a territory is part of the EU

No discrimination:
- The food law either applies, or must be complied with.

No short cuts:
- There cannot be a compromise on safety standards.

But there is flexibility:
- Objectives must be met, not the letter.

And there is technical assistance:
- Several funds, policies and mechanisms.
# SPS requirements for market access

<table>
<thead>
<tr>
<th>Category</th>
<th>Contaminants</th>
<th>Hygiene</th>
<th>Health</th>
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<tr>
<td>Fruit</td>
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<td>General</td>
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<td>Potatoes</td>
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<td>Plant health</td>
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<tr>
<td>By-products</td>
<td>Market surv.</td>
<td>General</td>
<td>Mainly BSE</td>
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<td>Fresh fish</td>
<td>Market surv.</td>
<td>Specific</td>
<td>-</td>
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<td>Aquaculture</td>
<td>Monit. Plan</td>
<td>Specific</td>
<td>Animal health</td>
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<tr>
<td>Meat prod.</td>
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<td>Fresh meat</td>
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<td>Milk prod.</td>
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<tr>
<td>Animals</td>
<td>Monit. Plan</td>
<td>Specific</td>
<td>Animal health</td>
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</tbody>
</table>

Lebanon is only listed for honey
Bottom Line: Go to Europe?

Market access conditions are complex and not easy to meet, but ...

• One negotiation – 500 Mio consumers;
• Fully harmonised, transparent rules in-line with international standards;
• No discrimination.

... animal health conditions are difficult to meet.

• Trade with regions of same health status;
• Risk management is possible.
Given the time and effort needed ...

**STRATEGIC PLANNING AVOIDS FRUSTRATION**

- Long-term business perspective;
- Realistic assessment of risks;
- Commitment of industry and government;
- Transparency, lines of communication;
- Follow the process through – it may take several years.

**Capacity of Competent Authority is key.**
Documentation on the web

General Information:
http://ec.europa.eu/food/index_en.htm

Food and Veterinary Office:
http://ec.europa.eu/food/fvo/index_en.html

European Food Safety Authority
http://efsa.europa.eu