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Programme Implemented
by Secretariat of ACP
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Final Report
Country profiles and fishery product hygiene/food safety
situation analysis of The Gambia
ART056 GEN

October, 2010



Strengthening Fishery Products Health Conditions in ACP/OCT Countries



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October, 2010

R. Shotton

**Cardno Emerging Markets (UK) Ltd in Association with
Megapesca Lda and MacAlister Elliott and Partners Ltd**

**The contents of this report do not necessarily reflect the policy or official position of the
Secretariat of the ACP Group of States or the European Commission**

The picture on the cover shows Tanji Beach fish landing site during afternoon unloading.

Module 4
Strengthening National Health Control Capacity for Fishery Products
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Strengthening Fishery Products Health Conditions in ACP/OCT Countries 8ACPTPS137

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ABBREVIATIONS

EU European Union

LAYMAN'S SUMMARY

This report provides a summary of experiences and views of missions undertaken to The Gambia under the aegis of the EU Strengthening Fishery Products. In addition to a "Situation Analysis" of fisheries and their management from a health and quality perspective, comments are given on how fisheries are governed and the implications for fish quality and health.

The major problem in addressing these problems comes from the low level of profitability in the sector and the absence of adequate finance for upgrading facilities and operating capital - to pay for product and operate until invoices are paid. Two schedules are included: the first is a country profile that includes the response of the government to comments by visiting EU inspection missions and information on the fisheries sector. The second Schedule includes information for possible inclusion in a Country profile report.

EXECUTIVE SUMMARY

The domestic fish processing sector is essentially collapsed, because of overcapacity (view of Mission) relative to the supply of fish and inadequate sources of operating and investment capital. Despite this, there has been no consolidation of the sector to result in fewer but profitable enterprises. Despite seven factories being registered to export fish to the EU, all but perhaps one, require upgrading to fully satisfy the health and safety requirements of the EU. HACCP procedures are almost non-existent with the consequence that there is inadequate monitoring of product source and handling. For its part, the Department of Fisheries is unable to undertake standard health and quality analyses and does not monitor the quality of water used in fish plants and the production of ice.

Inspections appear to be done but their documentation is wholly inadequate:

There are no records of penalties for infractions. Resource wise, Gambia has a wide range of fish products in demand for local markets (smoked and sun-dried small pelagic species) and for export (shrimp, sole and other high-value fin-fish). Much of this production is exported through Senegal by migrant Senegalese fishermen. Government policy is to redress this issue but there is no effective strategy and operational measures.

The SFP has probably done little, if not nothing, to address the underlying problems: this will require a change in assistance objectives, strategy and the means of implementation.

1. INTRODUCTION

SFP Module 4 has been asked to provide a situation analysis of fishery product hygiene control issues and ongoing needs in the Gambia. This profile follows, in general, the template given in Schedule 1 of the TOR (Annex 1). A separate situation analysis will provide a snapshot of the current fishery status of the country concerned: it is to be more analytical and forward-looking in regard to fishery product hygiene controls. The situation analysis summarizes the current situation, the work already carried out, and ongoing needs of fishery product hygiene and food safety, in the countries concerned, taking into account the findings of SFP missions to the countries concerned.

The Country Profiles and Situation Analyses will be used by the PMU to identify future activities that will build on the work undertaken by the SFP.

2. DESCRIPTION OF WORK UNDERTAKEN

Three primary documents have been produced during this schedule of work:

i. A three-page report titled: “Country situation – Fishery Products Health Conditions”. This report consists of the following sections:

- I. SFP Programme background
- II. Summary of issues originally identified by the SFP (all Modules)
 - Institutional Issues
 - The Commercial Sector – The Fishing Industry
 - National Strategy and Management
 - Socio-economic Issues and Problems
 - Safety and Quality Issues
- III. SFP answer to main issues (a review of mission reports for which information was available).
- IV. SFP interventions.

ii. A 12-page Schedule 1 - Country Profile for The Gambia: this follows the outline provided by Module 4

iii. A seven-page Schedule 2 - Possible information for inclusion in The Gambia Country Profile.

3. CONCLUSIONS AND RECOMMENDATIONS

Conclusions

The handling of most fish, both at sea and once landed, is of a minimal standard of quality and hygiene and clearly, with rare exceptions, does not satisfy the requirements of the European Union. Complicated laboratory tests are not needed to demonstrate this. There are many reasons for this but the two most evident are:

- i Much of the fish, especially all of the small pelagic species, is destined for local markets that do not require or insist of imposition of quality standards at the level insisted upon by the European Union (EU). Nor is it likely that the local markets in their present state would pay the premium necessary to ensure a high quality product through greater use of ice.
- ii Much fish is purchased shortly after landing, either for immediate processing (usually sun-drying and/or smoking) and severe loss of quality is not a detectable issue
- iii Much of the higher value finfish goes to Senegal probably for subsequent re-export: in this case its origin would be lost.

The domestic fish processing sector has essentially collapsed not least because of lack of operating and investment capital. This problem has been caused or compounded by:

- i The unrealistically large number of inadequately- financed processors who built plants in The Gambia
- ii Marginal availability of raw product form an entirely artisanal sector with barely adequate fish handling facilities
- iii The failure of the (probably ill-considered) policy of making the Gambia some form of hub for processing of fish caught elsewhere which augmented overcapacity and optimism in the processing sector

Government policy appears to have followed an entirely market driven policy that did not constrain expansion of processing capacity. None of the existing operators can exploit the best markets for the fish species that occur in Gambian waters as they do not have access to the foreign markets that would provide the best prices. Foreign buyers are unlikely to finance local operators whose demands for upgrading processing facilities are substantial and thus would be high-risk from an investment perspective.

The primary cause of the current lamentable situation in the fish processing sector in the Gambia, the Gambian government needs to develop and adopt an aggressive and interventionist policy if it wishes to revive its domestic fish processing sector. This policy should limit the number of licensed fish processors and acknowledge that this will result in a few, but profitable, enterprises.

Recommendations

In the view of the Mission, the following are required actions:



- i The Gambian government must address the reasons for the collapse of the domestic fish processing sector and develop and implement appropriate policies to remedy the situation.
- ii The fish processing sector must be returned to profitability so as to enable it to upgrade their standards, provide a price incentive to fishermen to supply product that has been better iced and otherwise handled at sea.
- iii Increasing the profitability of the processing sector (which will have flow-on effects to the artisanal fishermen) will require that processors coordinate and cooperate in accessing the best paying export markets.
- iv The Department of Fisheries should be more pro-active in undertaking inspections of fish landing sites and fish processors. It should upgrade the quality of inspection activities – inspection reports must be documented and archived in a computer database and be readily retrievable. Summary reports should be produced.
- v There is a limit to the benefits from *ad hoc* consultants' missions: a sincere dialogue is needed to determine a jointly-agreed schedule of objectives, goals and future activities.

4. LIST OF ANNEXES

- Annex 1 Terms of Reference
- Annex 2 Programme and People Met
- Annex 3 Country profile & synthesis: The Gambia

ANNEX 1: TERMS OF REFERENCE

TERMS OF REFERENCE

 SFP ACP/OCT Programme 8ACPTPS137 	
Assignment name and number	ART056GEN: Country profiles and fishery product hygiene/ food safety situation analysis of The Gambia
Coordinator	Coordinator, Module 4.
Technical Supervisor	Expert on sanitary conditions of Fishery products – SFP PMU
Background to assignment	<p>SFP Module 4 has been requested by the SFP Programme Management Unit (PMU) to provide a Situation Analysis of fishery product hygiene control issues and ongoing needs in the SFP beneficiary ACP states of The Gambia. These will provide a basis for the planning and development of future technical assistance programmes and specific interventions in the field of fishery product food safety in those countries.</p> <p>SFP Module 1 has already produced country profiles for a number of SFP beneficiary states and OCT. Where country profiles already exist, they will be updated, and where they do not yet exist they will be prepared, as part of the present mission. The profiles will follow the template already developed (reference CA039GEN) and attached as schedule 1 to these TOR. Schedule 2 provides a list of information that should ideally be included in the profiles, although it is understood that not all information may be available for all countries. It is anticipated that each profile will be up to 4 pages in length, although longer profiles will be accepted where justified.</p> <p>In addition, a separate Situation Analysis document will be produced for each country covered by the mission. Unlike the Country Profile, which is essentially a snapshot of the current fishery status of the country concerned, the Situation Analysis will provide more analytical and forward-looking views in regard to fishery product hygiene controls. The Situation Analysis is intended to summarise the current situation, the work already carried out, and ongoing needs in the field of fishery product hygiene and food safety, in the countries concerned, taking into account the findings of SFP missions to the countries concerned. The format and required elements of the Situation Analysis are specified in schedule 3. Normally the Situation Analysis should not be longer than 4 pages.</p> <p>The Country Profiles and Situation Analyses produced by this mission will be used by the PMU in the identification of appropriate follow-up activities that will build on the work undertaken by the SFP. They will also be posted on the SFP website where they can be accessed by SFP-related programme managers, technicians, counterparts, and the general public. The availability of this information will help ensure that SFP results and information contribute to ongoing development activities in SFP beneficiary states and overseas countries and territories the after the programme’s closure.</p>

Issues to be addressed	<p>1) Preparation or updating of Country Profiles for the specified countries, following the format specified at Schedule 1, and to the greatest degree possible including the information specified at Schedule 2.</p> <p>The information concerning official fishery product hygiene control systems (section 6 of the Profile) should be organised in the same manner as section 10 of the SFP Manual/Handbook for the Execution of Sanitary Inspection of Fish as Raw Material and Fish-Products as Food for Human Consumption, namely:</p> <ul style="list-style-type: none"> Identity of the Competent Authority Organisational structure Staff and functions Inspection staff training and competences Anti-corruption measures Internal quality assurance system Financial arrangements <p>Other useful details, depending on the circumstances of the country and the availability of information, might include:</p> <ul style="list-style-type: none"> List of approved establishments (by area or location if feasible) Landing sites Sectoral organisations, expertise and equipment at industrial and small-scale levels (associations, cooperatives or groups of companies or artisanal fishermen); Laboratories and technical institutes providing services to the fishery business operators (FBOs) and/or the Competent Authority. <p>The Country Profiles should normally be 4 pages in length, but longer profiles will be accepted if justified.</p> <p>2) Preparation of Situation Analyses for the specified countries, following the format specified at Schedule 3. Specifically, the Situation Analyses will:</p> <ul style="list-style-type: none"> identify the main issues existing prior to interventions by the SFP; document the responses to these issues made through missions and other interventions by the SFP; and Identify problems and challenges that still exist, and propose actions needed to address them. <p>The Situation Analyses should normally be 2 pages in length, and should not exceed 4 pages.</p>
Activities of the Consultant	<p>The expert will undertake the following tasks in regard to The Gambia:</p> <ul style="list-style-type: none"> Collect, review and edit relevant information in order to produce Country Profiles according to the format shown in Schedule 3, containing as much of the information listed in Schedule 2 as possible ; Collect, review and edit relevant information in order to produce Situation Analyses according to the format shown in Schedule 1; <p>The work will be undertaken from the expert's home base. No field travel is provided for.</p>
Expected outputs	<p>The main outputs of the mission will be:</p> <ul style="list-style-type: none"> Up-to-date Country Profiles for The Gambia; Situation Analyses for The Gambia. <p>The Country Profiles and Situation Analyses will be submitted as annexes to a brief report which summarises the work done and any comments pertaining</p>

	<p>to it.</p> <p>The report is to be produced using MS Word for word processing, as well as other MS Office software where necessary. The report must be made available in hard copy and electronic form, both in Word/ MS Office as appropriate, and in pdf format, with all elements combined in a single file. More information on the report format is contained in the next section.</p>						
Report format	<p>The Consultant will be provided with a standard document template in MSWord which must be used as the basis for the mission report. The report will be prepared in English or French, according to the following structure:</p> <p>Title pages in model format as per other Programme Reports;</p> <p>Table of contents, list of countries covered;</p> <p>List of annexes;</p> <p>Abbreviations and acronyms;</p> <p>Brief description of work undertaken and any comments and recommendations;</p> <p>Annex 1 Terms of reference;</p> <p>Annex 2 Schedule and people met (with contacts);</p> <p>Country Profiles and Situation Analyses, presented as separate annexes;</p> <p>Any other annex (es) as appropriate.</p> <p>Format as per PMU indications.</p>						
Report to be reviewed by	SFP Programme Manager						
Duration/ indicative schedule of work activities	<p>The following schedule of inputs is indicative only, and subject to amendment by the consultant in response to operational considerations</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Working days</th> </tr> </thead> <tbody> <tr> <td>The Gambia</td> <td>2</td> </tr> <tr> <td>Total</td> <td>2</td> </tr> </tbody> </table> <p>Total working days will equal 2 calendar days.</p>	Activity	Working days	The Gambia	2	Total	2
Activity	Working days						
The Gambia	2						
Total	2						
Start date	August / September 2010 (estimated)						
Completion dates for reports	<table border="1"> <tbody> <tr> <td>Draft report to PMU</td> <td>Within 3 days of completion of the assignment</td> </tr> <tr> <td>PMU comments</td> <td>Within 1 week of reception</td> </tr> <tr> <td>Final report</td> <td>5 working days after reception of PMU comments</td> </tr> </tbody> </table>	Draft report to PMU	Within 3 days of completion of the assignment	PMU comments	Within 1 week of reception	Final report	5 working days after reception of PMU comments
Draft report to PMU	Within 3 days of completion of the assignment						
PMU comments	Within 1 week of reception						
Final report	5 working days after reception of PMU comments						
Experience and qualification	<p>Experts of category II (at least 10 years of experience)</p> <p>Qualifications and skills:</p> <p>A University degree in veterinary, food technology or related sciences</p> <p>Knowledge of English is essential.</p> <p>The applicant must be of EU or ACP member states nationality.</p> <p>General professional experience:</p> <p>Comprehensive knowledge of EU regulations relevant to control of fish and fishery products sanitary status.</p> <p>Demonstrated long-term background in fish and fish products surveillance</p> <p>Specific professional experience:</p> <p>Long term background in the application of EU legislation and procedures for inspection and certification in third countries; the drafting of manuals of procedures for the inspection and certification, and the design and setting up of self-control systems, based on HACCP methodology, by the food industry as well as their audit by official inspection bodies.</p>						
Locations and travel	Expert based in Heraklion, Greece. No travel required.						

ANNEX 2: PROGRAMME AND PEOPLE MET

This mission did not involve any travel and thus no people were met. The work programme consisted of accessing various web sites including the EU SFP programme and Finance, Contracts and Legal Affairs and the FAO fishery web site.

ANNEX 3: COUNTRY PROFILE & SYNTHESIS: THE GAMBIA

SCHEDULE 1



1. Status of EU Approval

1.1 Approved for export of Fishery products to the EU:

National Partnership Enterprises Ltd, Banjul
 Kendaka Food And Fisheries International Ltd.,
 Barra Fishing Company,
 Rosamond Trade,
 Fine Fish Company Ltd.,
 International Pelican Seafood Co. Ltd.,
 West African Aquaculture Ltd.

1.2 Validity date on List of Approved Establishments: 10/08/2007

1.3 Number and type of Establishments: 00005 - Processing Plant

1.4 Latest FVO Mission Report: 26 January to 1 February 2010, 2010-8542 - MR Final

1.5 Conclusion of the latest FVO mission report:

In The Gambia there is a system of public health controls with sufficient number of staff in place. The Central Competent Authority has taken corrective actions for RASFF alerts. However the effectiveness of the control system is severely compromised by the fact that no official controls on fishery products for contaminants, histamine and microbiology are carried out. In addition there are other deficiencies in the official controls of water, state of hygiene of vessels and landing sites, implementation of Hazard Analysis and Critical Control Points plans and traceability of fishery products.

1.6 CA response to FVO mission report:

	Recommendation	CA Response
1	The CA should ensure that the standards to be applied for the maximum levels of contaminants in FP for EU export are equivalent to those set out in Regulations 1881/2006 and 333 (2007),	<ul style="list-style-type: none"> The CA will ensure that the equivalent standards are applied for maximum levels of contaminants in FP for EU export are equivalent to those set out in EC Regulations. And, the maximum levels of contaminants set out in the Gambia Fishery Products Regulations 2010 will be updated to the current standards in conformity with the relevant EC provision. Official controls on contaminants will be assured by relevant testing laboratories that will identify samples sent to those laboratories for testing. Between 7 and 10 samples are to be tested for contaminants during 2010 for testing purposes including for benzo(a)pyrines in smoked fish. The CA will apply maximum control on products for export to EU including procedures for process control to prevent benzo(a)pyrines exceeding the acceptable level. In the absence of appropriate controls smoked products will be suspended from the fishery products export list pending the

		existence of reliably controlled production procedures and testing methods,
2	The CA should ensure that inspectors are aware of relevant Community provisions concerning production of FP in order to guarantee that statements contained in health certificates are reliable as stated in Point II.1 of the health certificate in Appendix IV to Annex VI to Reg. (EC) No2074 /2005.	<ul style="list-style-type: none"> The CA inspectors will continue to be trained to strengthen their capacity for improved inspection and certification functions, and be more aware of the relevant EC provisions applicable to the production and placing of FP on the market as stated in Part II.1 of the health certificate and to ensure reliable guarantees. Inspectos will be further trained on official inspection procedures including in the application, audit and certificaion of HACCP plans.
3	The CCA should provide guarantees that all fishing vessels providing raw materials as input for FP for EU export are systematically controlled on a regular basis to ensure that they meet standards at least equivalent to the requirements laid down in Regulations (EC) No 852/2004 Annex III, Section VIII, Chapter I.	<ul style="list-style-type: none"> All fising vessels providing raw materials to fish processing establishments (FPEs) are to be controlled on a more regular basis to ensure that they meet the required standards at least equivalent to those in Regulations (EC) 852/2004 Annex III, Section VIII Chapter I. The CCA will ensure that fishing (and transport) vessels providing raw materials are registered and inspected regularly for improved food safety control and traceability of products. Vessel deficiencies found during the FVO mission have been notified and are to be resolved otherwise the vessel's supply of FPs to establishments will be stopped.
4	The CCA should provide guarantees that landing sites involved in the production of FPs for EU export meet standards at least equivalent to requirements laid down in Regulation EC NOs 852/3 2004 and 853/2004 Annex III, Section VIII and Chapter II.	<ul style="list-style-type: none"> The CCA is improving inspection of landings sties and supervision of landings and official control of landed fish and facilities. Landing site inspection checklists are being developed. Regular inspections will result in reporting and follow-up of deficiencies at designated landing sites Inspectors of landing sites, fishery products, and approval systems will be further trained including the use of different inspection check lists. Officially designated ifsh landing sties for production of FP for export to the EU will be continuously improved and equiped with better handling and storage facilities.
5	The CCQ should ensure that the production of ice which comes in contact with FP meets the standards at least equivalent to the requirements laid down in Regulation (EC) NO. 852/2004, Annex II, Chapter VII, 4.	<ul style="list-style-type: none"> The CA will ensure that the ice production facilities and systems and quality of ice produced for use in fishery products will be subject to regular official sanitary control with reporting and follow-up to ensure equivalence with requirements of Regulation (EC) No. 852/2004, Annex II, Chapter VII, 4. Check lists for inspection of ice production facilities have been developed for the improved monitoring of ice production facilities. Deficiencies found at ice production plants during the mission have been communicated and discussed with the operators and are being followed up for correction failing which they will not be permitted to operate.
6	The CA should guarantee that only land-based establishments complying with standards equivalent to Community requirements (Reg. (EC) No. 852/2004) or with equivalent standards are authorized to export FP to the EU (Article 12, Regulation (EC) 852/2004. The deficiencies found during the mission should be corrected in the establishments and facilities visited and in all other establishments that were not visited but that may have similar shortcomings.	<ul style="list-style-type: none"> The CA will ensure that only land-based establishments complying with standards at least equivalent to EU requirements and or requirements provided for in the Gambia Fishery Products Regulations 2010 will be authorized to export FP to the EU. Identified deficiencies in fish processing establishments visited during the mission have been communicated to the concerned establishments, corrections requested and are followed up for satisfactory correction without which the approval of the establishment will be suspended. All establishments are being re-inspected including those that were not inspected. Establishments no complying satisfactorily and not correcting deficiencies will be suspended from export to the EU unless deficiencies are corrected within a reasonable time. Establishments will fully implement pre-requisite programmes and HACCP plans which are now submitted and currently being reviewed by the CA for comments and verification.
7	The CCA should provide guidelines as regards health standards and microbiological criteria at least equivalent to the requirements laid down in legislation (EC) No. 2073/2005.	<ul style="list-style-type: none"> The CA will ensure that health and microbiological criteria applied are equivalent to the requirements laid down in Regulation (EC) No. 2073/2005. CA will ensure samples are taken during official inspection and sent to appropriate laboratories for microbiological testing as part of official controls on fish and fishery products including for verification of production processes and auto-controls applied by industry. The CA is currently testing smoked products for total coliform bacteria and arrangements are being made for all relevatn microbiological tests on fishery products (including for listeria monocytogenes in smoked fish products) are part of the official controls and are part of the official

		<p>controls and that requirements are equivalent to the requirements laid down in regulation (EC) 2073/2005.</p> <ul style="list-style-type: none"> • It is planned that a total of about 15 official samples will be taken at random for micro-biological testing as part of official testing during 2010. • FBOs will be carrying their auto-controls in the implementation of prerequisite controls and HACCP which are presently being reviewed by the CA for comments. Inspections will ensure that microbiological criteria are applied to verify any CCPs of a microbiological nature.
8	The CCA should provide guarantees that standards for wrapping, packaging, storage and transport of FP are at least equivalent to the requirements laid down in Section VIII, Chapter VI, VII and VIII of Annex III to Regulation (EC) No. 853/2004.	<ul style="list-style-type: none"> • CCA will ensure satisfactory implementation of requirements on standards for wrapping, packaging, storage and transport of fishery products and ensure compliance with requirements particularly those laid down in relevant sections of Regulation (EC) No. 853/2004 • FBOs have been reminded of the deficiencies found during the FVO mission regarding storage of packaging materials and these are being followed up and corrected. Any establishment that is non-compliant will have its approval suspended until it is compliant within the reasonable time limit. • Henceforth the CCA will ensure compliance with requirements under section VIII, Chapter VI, VII and VIII of Annex III to Regulation (EC) No. 853/2004. Close monitoring will be ensured and inspection reports produced and any deficiencies followed up to ensure and hence give guarantee that requirements are being met.
9	The CCA should ensure that the traceability of FP exported to the EU is ensured at all stages of production, processing and distribution in order to provide guarantees that statements contained in the health certificate set out in Appendix IV to Annex VI to Regulation (EC) No 2074/2005.	<ul style="list-style-type: none"> • The CA is already ensuring improvements in the traceability of FP at all stages of production, processing and distribution to provide guarantees that statements contained in the health certificate are reliable as stated at Point II.1 of the health certificate set out in Appendix IV to Annex VI to Regulations (EC) No. 2974/2005. • FBOs are now to document the source of their raw materials supply to extend traceability to the fishing vessels and fishing grounds. All fishing vessels (including artisanal canoes) will be registered. Until such time that the registration process is completed, establishments with collaboration of fish suppliers and fishers, will ensure supply of verified landings to include information on species, fishing area, quantities, name of vessel/owner and landing site of operation. • All relevant traceability information will be provided in records and labels to ensure traceability, in fact, measures contained in the EU's Regulations and Gambia's collaboration in the implementation of these regulations complements the traceability system.
10	The CCA should ensure that potable water used in the establishments complies at least with all parameters (audit monitoring of potable water) of Directive 98/83/EC on quality of water intended for human consumption.	<ul style="list-style-type: none"> • The CA will ensure that potable water used in establishments and other facilities complies with parameters (audit monitoring of potable water of Directorate 98/83 on the quality of water intended for human consumption. • Although testing results of the establishments' own checks on water are also received by the CA, the CA will ensure the samples of water used in ice production, FPEs, landing sites and other approved facilities are more regularly tested as part of official CA controls. • The full implementation of the prerequisite programs and HACCP based food safety control system by processing establishments will facilitate implementation and verification of the quality of potable water.
11	The CCA should ensure that the FP have satisfactorily undergone official controls equivalent to those set Chapter I, Annex III to Regulation (EC) No. 854/2004.	The CCA will ensure continuous improvements in official control of fishery products to ensure satisfactory implementation equivalent to Regulation (EC) 854/2004 and other related regulations including the Gambia's Fishery Products Regulations 2010.
12	The CA should: insure that laboratories performing official analyses are assessed and that adequate quality controls exist for the reliability of test results (Codex Alimentarius, CAC/GL 26-1997); ensure that these laboratories take into account the testing methods of Community legislation.	<ul style="list-style-type: none"> • The CA will ensure that laboratories undertake tests on fishery products with adequate quality control procedures in place to ensure reliability of tests. • The CA microbiology and chemical testing laboratories are being redesigned to achieve accreditation after which samples can be locally tested. • Meanwhile, the CA will send official samples for testing in appropriate laboratories in Africa or if necessary in reference laboratories in Europe. • Some 10 samples will be tested for chemical residues including benzopyrines in smoked fish products and 15 microbiological testing during 2010.

1.7 Special import conditions (bans etc.): none found

1.8 Rapid Alerts and Notifications

During 2004 and 2005 a total of six notifications from the Rapid Alert System for Food and Feed (RASFF) related to products imported from Gambia were received. The notifications were related to thawing and bad temperature control of products exported by air.

29/05/2008	United Kingdom	benzo(a)pyrene (39.4 µg/kg - ppb) in smoked shrimps from the Gambia	product (to be) destroyed
29/05/2008	United Kingdom	smoked fish from the Gambia infested with larvae of insects (demestes beetle)	product (to be) destroyed

In 2009 there were twelve RASFF notifications issued (seven for Polycyclic Aromatic Hydrocarbons (PAH) in FP, three for bad temperature control on FP and two for bad hygiene condition of FP). In 2008 there were four RASFF notification issued (two on smoked fish infested with larvae or insects and two for PAH in shrimps).

Reports of RASFF for 2010 were as follows:

border rejection	18/05/2010	26/05/2010	2010.AWT	CH	benzo(a)pyrene (0.009 mg/kg - ppm) in smoked threadfin (<i>Polydactylus quadrifilis</i>) from the Gambia	fish and fish products
information	20/05/2010	26/05/2010	2010.0622	NL	unauthorised import of frozen seafood from the Gambia	fish and fish products

2. Status of previous country specific SFP Input

2.1 Improved Planning and Management of Artisanal Fisheries Organisations. REG/70021/000 8.ACP.TPS.137 8.ACP.PTN.REG.001. This manual is intended to help fishermen, fish traders, community leaders and extension agents to set up and operate successful fisheries organisations such as beach management committees, community-based fisheries management committees or fish selling co-operatives. It explains how to decide whether the conditions are right for setting up a fishery organisation and the different types of organisation that can be formed. The manual explains that community-level organisations must be supported by inter-group organisations to be sustainable. The manual explains the needed to set up initial meetings and to elect management committees for FCOs; the roles and responsibilities of the committee; the chairperson, treasurer and secretary. It also suggests ways to improve the effectiveness of FCOs. The manual explains the importance of inter-group organisations and the process of establishing IGFOs and that community-level groups need to reach a level of maturity before they need and can support an additional tier of organisation. A final section is on improving the performance of fisheries organisations and approaches that could be taken to address failing organisations. Outputs include planning documents and PowerPoint.

2.2 IND009GMB Assessment of industry compliance and determination of assistance needs in the Gambia. This report summarises the outcome of a visit under the project “Assessment of industry compliance and determination of assistance needs in the Gambia that provided assistance to the Gambian fish processing industry through evaluation of and provision of advice on the fish processing establishments” physical infrastructure, pre-requisite programmes and HACCP systems taking into account previous SFP missions to

Gambia in 2006 and 2009 and the 2006 FVO mission. The programme involved visits to five processing establishments (only one functioning), an aquaculture farm and hatchery and brief visits to landing sites and a new fish market. A visit to the Fisheries Laboratory (the CA's designated laboratory) was also undertaken. The mission was three years after the last FVO mission in 2006. The Gambia has 7 approved processing establishments undertaking primary processing operations. At the time of the visit, one of these had been withdrawn, but it wasn't yet formalised by the EC. The components of factory design and layout, prerequisite programmes and HACCP were evaluated that can be improved upon. In only one case were all three components able to be fully evaluated, as the other processing factories were not operational at the time of the visit. The relative importance of the three aspects varied between factories but there was a common issue identified in that improvements to manuals and records were needed in all establishments. Detailed feedback was given to the senior and technical management of the fish processing establishments during discussions held at the premises. Comments and annotations were provided on appropriate documents where appropriate, e.g. factory layout plans, pre-requisite programme manuals, hazard analysis sheets, HACCP plans, etc.

An informal mini-seminar was held for all establishments towards the end of the mission to address the issues raised by the consultant during the visits. The report concludes that there are opportunities for further SFP interventions to provide assistance to the industry (Module 3), the Competent Authority (Module 1) and the laboratories (Module 2).

2.3 ART014GMB. Follow up of SFP AWA Project, to Introduce the Present Programme Approach and to Identify Further Needs Mission Reference. The artisanal fisheries sector provides small pelagic fish for local drying and smoking that are then shipped to national and regional markets. Methods used are consistent with traditional practice and demand is driving an expansion of this activity. Temporary constructions in undesirable conditions are being built to undertake fish processing. Fish quality from this type of processing would be unacceptable on European markets. This activity will be limited by the supply of firewood, which is already trucked considerable distances.

The other major activity is the targeting of high-value species (shrimp, cuttlefish, lobster, sole and several percid species) that have a ready market in Dakar and could be sold to great benefit in Europe. This type of fishing may involve trips of up to a week in which case icing of the catch is essential. While these boats must use ice boxes, none were of suitable construction. These species are also taken during shorter trips during which no ice may be used.

The fisheries associations play an essential commercial and social role in the communities. However, in most cases their management is weak and two associations are now unable to produce ice. In the case of Banjul, this is the sole function of the association. Nearly 90% of landings go through the top five landings centres, four of which are on the Atlantic coast.

The national export-processing sector is moribund and undercapitalized. The risk of product rejection on European markets cannot be afforded. Only one plant was operating at the time of the mission visit. No processors are generating sufficient profits to upgrade their operations. The withdrawal of processors from buying fish from the artisanal sector has changed the artisanal fishery market with some main landing centres sectors being forced to stop operations.

Assistance can be provided to (a) increase the management capacity of the fishing associations; (b) provide plant workers with training on fish quality and safety issues; (c) make available insulated containers for pirogues and landings sites; (d) implement a pirogue registration scheme (as required by the *Fisheries Act (2007)* and (e), develop a model fish landing and auction site.

2.4 ART017GMB: Training of lead personnel of small-scale fishermen’s groups at landing sites in basic socio-economic matters in Gambia: An important step toward enabling the artisanal fishers to become competent partners in international and national markets is to increase their capacity to organise themselves in functional groups or associations. This training of lead personnel/decision-makers of selected landing sites includes training on the development of business plans to facilitate access to financing and/or grants from interested donors.

The training was done using the manuals and the related PowerPoint presentations developed by previous SFP module 4 projects (ART025GEN and ART026GEN). Training involved on-site consultations at four fish landing centres on the Atlantic Coast. All fishing associations were assessed in terms of their circumstances and management competence. This project continued the work undertaken during the earlier mission “Project to introduce the Present Programme Approach and to identify Further Needs”. Attention was also given to understanding current needs for re-organisation of the fishing associations.

The second phase of the mission consisted of:

- i presentation and review of the course material in a ‘plenary’ manner with management from all of the fishery associations: this was concluded with a summary meeting to review individual business plans; and
- ii Fishery association-specific workshops for the development of individual working plans.
- iii Lastly the results of the programme were reviewed with Fisheries Department management and a presentation of the mission’s findings and activities was made to the Permanent Secretary of the Ministry of Fisheries, Water Resources and National Assembly Matters.

In both phases the mission worked closely with staff of the Department of Fisheries and the Executive Director of the Gambian National Organisation of Fisheries Associations. The mission participated in an effort by the Gambian National Association of Artisanal Fisheries Organisations to document relevant concerns and related views raised during the Mission. Meetings were held over 10 working days. Two work days were reserved for meeting preparations and one work day was a national holiday. Four site-specific fishery association business plans were developed, both as a training exercise and a first attempt at preparing this kind of management document.

3. Fishery sector profile

3.1 Marine Fisheries

The fisheries sector consists of artisanal and industrial sub-sectors. The artisanal sub-sector consists of marine and inland parts. Shrimp aquaculture and small-scale fish aquaculture are practiced along the river.

Industrial fishing activities are concentrated along the Atlantic coast. The major players are Gambian entrepreneurs in partnership with investors from Greece, Spain, Italy, China, South Korea and Holland. The industrial sub-sector provides permanent and part-time employment to between 500 to 2,000 people. Twenty locally registered fishing companies operate in The Gambia of which 9 operate fish processing establishments: five are certified to export to EU countries. Industrial fishing activities occur in coastal and marine waters up to the limits of the EEZ comprising mainly fishing trawlers targeting the limited demersal species with preference for cephalopods, shrimps and other high value species (barracuda, groupers,

snappers etc). In 2007, a total number of 32 industrial fishing vessels operated in Gambian waters; 15 were shrimp trawlers while 17 boats targeted cephalopods.

Almost no establishments own ‘industrial’ boats: most vessels operating in the Gambia are foreign owned and have entered the fishery through joint ventures or through fishing agreements such as the Reciprocal Maritime Fishing Agreement between the Gambia and Senegal or compensatory agreement. These foreign operated vessels do not land their catches in the country but in foreign ports. Vessels carry an observer. There are plans to construct a Fisheries Port in Banjul under the ADB/BADEA funded artisanal Fisheries Development.

Annual industrial production has declined in recent years. In 2005, industrial fisheries production was estimated at 4616 t of which 2221 t came from the demersal fishery and 588 t consisted of small pelagic species. The decline in volume and value of exports is a result of poor performance by fishing companies and also that exporters do not include fish caught in Gambian waters but landed in foreign ports. There is also smuggling of fish across borders.

Type of Canoes	2006
<i>Non-motorized canoes</i>	1,082
Gambian	700
Non Gambian	382
<i>Motorized Canoes</i>	625
Gambian	325
Non Gambian	300

3.2 Marine Fishing Fleet

The number of vessels that fish from the Gambia has been variable over the years, e.g. in 2007 there were 15 are shrimp and, 17 fish\cephalopod trawlers. This number has declined but an agreement with Taiwan has seen the relocation of many of their tuna longliners to Banjul. Of artisanal pirogues, 75% belong to Senegalese fishermen who operate seasonally from the Gambia moving to the Casamance or elsewhere following fish migration patterns. There is no enforcement of licensing of pirogues so fleet sizes can only be estimated. There range around 2000 pirogues.

3.3 Marine fleet Catch

	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
African sicklefish	30	60	85	186	206	93	108	140	347	257
Alexandria pompano	-	-	-	-	2	1	3	4	-	424
Barracudas nei	120	284	631	2,573	1,012	153	464	438	762	334
Bluefish	80	35	70	60	92	-	-	-	-	-
Bobo croaker	170	138	120	494	255	274	182	405	861	396
Bonga shad	22,750	20,508	18,516	22,786	22,118	16,815	14,978	13,187	13,876	11,744
Cassava croaker	120	58	400	620	354	185	1,438	780	1,391	2,200

Chub mackerel	-	-	-	-	121	128	110	131	407	19
Cuttlefish/squid	100	422	1,499	696	957	321	1,993	1,345	826	603
False scad	126	69	54	55	118	404
Gastropods nei	250	5	20	1	14	.	15	106	685	592
African threadfin	90	169	141	206	307	82	248	602	722	1,036
Groupers nei	30	49	63	66	55	101	667	339	129	130
Hairtail/scabbardfish	5	.	28	8	<0.5	4,022	1	.	39	570
Jack/horse mackerel	130	175	246	417	145	140	766	318	211	407
Jacks, crevalles	160	137	288	899	306	111	796	484	590	640
Law croaker	270	454	856	794	897	355	.	79	48	73
African threadfin	60	87	116	120	132	78	210	454	608	425
Marine crabs nei	.	6	2	22	120	44
Marine fishes nei	-	-	6	204	11	211	9	282	58	396
Meagre	10	22	33	645	42	45	1	1	1	13
Mulletts nei	70	123	69	208	147	208	124	884	850	569
Palinurid lobster	80	130	75	98	118	23	24	35	4	38
Pandoras nei	20	12	.	8	.	234	84	.	457	12
Parrotfishes nei	.	13	1	17	-	-	-	-	-	1
Puffers nei	-	4	33	81	3	1,222	190	423	687	166
Royal threadfin	767	152
Rubberlip grunt	170	107	124	365	1,130	89	96	104	190	193
Sardinellas nei	70	10	81	1,711	1,488	1,266	564	4,941	4,417	7,064
Sea catfishes nei	540	749	950	2,238	734	774	2,210	2,526	4,046	3,523
Elasmobranchs	630	720	3,982	6,128	1,085	494	1,738	324	361	471
Snappers nei	90	90	126	122	60	96	85	406	133	600
Sompat grunt	230	276	423	439	888	271	516	739	1,190	1,541
Pink shrimp	400	301	211	324	98	76	112	230	1,549	1,633
Tilapias nei	1,070	1,062	1,077	1,117	1,041	1,031	932	850	719	1,077
Tonguefishes	450	725	2,262	586	614	842	2,001	1,372	1,294	866
W. African croaker	340	629	504	49	725	-	-	-	-	-
W. African ladyfish	.	.	12	26	3	40	767	1,247	962	941
Yellowfin tuna	1	5	1	26	55	1	-	1	-	-

3.4 Marine Fish Species

African sicklefish	Alexandria pompano	Barracudas nei
Bluefish	Bobo croaker	Bonga shad
Cassava croaker	Chub mackerel	Clupeoids nei
Cobia	Croakers, drums nei	Cuttlefish, bobtail squids nei
False scad	Freshwater fishes nei	Gastropods nei
Giant African threadfin	Groupers nei	Guinea shrimp
Hairtails, scabbardfishes nei	Jack and horse mackerels nei	Jacks, crevalles nei
Law croaker	Lesser African threadfin	Marine crabs nei
Marine fishes nei	Meagre	Mulletts nei
Octopuses, etc.	Palinurid spiny lobsters	Pandoras
Parrotfishes	Pompanos	Porgies, seabreams
Puffers	Royal threadfin	Rubberlip grunt
Sardinellas	Sea catfishes	Sharks, rays, skates, etc.
Snappers	Sompat grunt	Southern pink shrimp
Threadfins, tasselfishes	Tilapias	Tonguefishes
Trigger fishes, durgons	Various squids	West African croakers
West African ladyfish	Yellowfin tuna	

3.5 Inland Fisheries

Because the Gambia river is an extremely large estuary about which the country is configured, the distinction between freshwater and marine fishes is unhelpful. Depending on rainfall, species taken at one location on the estuary will vary in the salinity tolerance on a seasonal basis. There are few purely freshwater species and even fewer are commercialized.

3.6 Inland Fishing Fleet

See Section 3.5

3.7 Inland/Freshwater Catch

See Section 3.5.

	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Freshwater	1,450	1450	1450	1450	2,000	2,550	3,100	3,650	4146	3,089
Tilapias	1,070	1062	1077	1117	1,041	1,031	932	850	719	1,077

3.8 Inland Fish Species

See Section 3.5.

3.9 Aquaculture Production

Totals by species (tonnes) and year (1999-2007). These are from the FAO StatFish database. It is noted that no production of shrimp are recorded.

	Environment	1999 (tonnes)
African bonytongue	Freshwater	2
African bonytongue	Freshwater	1
Torpedo-shaped catfishes nei	Freshwater	2
Torpedo-shaped catfishes nei	Freshwater	1

3.10 Aquaculture Species

See Section 3.9.

3.11 Socio-Economics

The Artisanal Fishery sub-sector is characterized as low cost and labour-intensive. Fishing is done using traditional fishing crafts and less sophisticated fishing gears, methods and techniques and processing methods. Entire communities may depend: wives and other family members may be involved in fish processing and marketing. Fishing continues to be a source of relatively attractive incomes and people from rural areas continue to migrate to the coast entering this economic activity. The type of fishing practiced in Gambia is similar to that found in most artisanal communities in West Africa.

	2006
Head Fishermen	1,410
Gambian	805
Non Gambian	605
Assistants Fishermen	4,694
Gambian	2,291
Non Gambian	2,403
Total Fishermen	6,104
Gambian	3,096
Non Gambian	3,008

3.12 Sustainable Management (Resource Management)

There is no effort limitation, restrictions on entry into the fisheries or closed seasons imposed by the Department of Fisheries. There is no indication of any enforcement of conservation regulations and Fisheries Officers often are unaware of the appropriate conservation regulations. Consequentially, it cannot be said that there is any sustainable management. In some areas there is good compliance with customary management measures such as fishery closures and limits on fishing effort. These should provide a basis on which the Ministry could build.

4. Processing Sector

4.1 Industrial processing

Seven small scale fish processing operators are approved for export to the EU. However, because of lack of working and investment capital only one of these is operating and this one at only a minimal level. A Taiwanese operator lands tuna for export but the level of processing is unknown. One operator, Rosamond Trade, undertakes smoking of fish in an industrial context however, many artisanal fish smokers operate with greater volumes of product. *

4.2 Small-scale processing

Fish processing on a small-scale basis is undertaken by fish smokers that range from one or two women through to facilities involving dozens of fish smoking houses. Fish are hot smoked over essentially open fires in what must be extremely unhealthy conditions for the

workers. The large fraction of small pelagics in the fish landings of the Gambia provide the raw material for this trade.

5. Fish Trade

5.1 Local and Regional trade

Sun-dried and smoked fish are sold in markets throughout the Gambia. Fresh fish is also consumed when it can be transported to markets and still be in a reasonable condition. For this reason, because of the severe limitations on chilled storage, large catches may result in much of the catch being dumped because of spoilage before customers can be found.

Much ($\approx 75\%$) of the fishing done from Gambia is undertaken by Senegalese fishermen. They are usually financed by traders from Senegal to whom they consign their product. It is trucked to Senegal and from there the more valuable species may enter international trade as Senegalese product. Smoked fish, which does not require chilled storage, is trucked to west African markets especially within the interior. The Ghanaian fishing community that constitutes Ghana Town in The Gambia specialized in shark fishing. These fishermen export the shark fins to the Far East (Hong Kong and China) and the dried shark meat to Ghana.

5.2 International Trade

Small quantities of smoked catfish are exported to EU countries mainly for ethnic markets. Where export markets exist, Trade in fisheries products has been conducted within a framework of the liberal and free market policy of the Government. Over 90% of industrial production is for export to mainly countries of the European Union (E. U.) such as Belgium, the Netherlands, Spain, U. K., Italy and France. Ghana, Nigeria, the U. S. A., Canada and Hong Kong are also major importers of Gambian fishery products.

The most important products exported during the period 1999 – 2007 by value have been frozen shrimp (22.7%), Sole (21.8%), smoked/dried fish (12.9%), frozen (6.7%), cuttlefish (6.5%). Fresh shrimp have represent 2.7% but value of exports during this period.

6. Food Safety and Health Conditions

Fisheries Department
Dept. of State for Fisheries, Water Resources and National Assembly Matters
6 Marine Parade
Banjul, The Gambia

7. International Development Cooperation

7.1 EC Fisheries Partnership Agreements

7.2 EC Development Strategy

Unknown.

7.3 Other donor interventions in the field

United States Agency for International Development / West Africa,

8. References

FAO FishStat Fish landings and production database

FAO Country Profile – Fisheries. FID/CP/GAM, December 2007

GAMBIA ARTISANAL FISHERIES DEVELOPMENT PROJECT 2006. The 2006 Fishery Frame Survey Report. .Department of Fisheries, Department of State for Fisheries and Water Resources, Banjul, The Gambia. 71pp.

SCHEDULE 2

Schedule 2: Desirable information for inclusion in Country Profiles			
1. Country Strategy in regard to Export to EU			
Which products are now, or are expected in the future to be, exported to the EU market (tick those that apply and state the approximate amounts if available)			
	Now	In future	Approximate amount (a judgemental estimate - per annum)
From Marine Catch			
Chilled fish	✗	✓	<100 t
Chilled crustaceans:	✗	✓	<20 t
Frozen fish	✗	✓	<500 t
Frozen crustaceans:	✗	✓	<100 t
Canned/sterilised fish/crustaceans:	✗	✗	
With other preservation(dried, smoked, salted)	✓	✓	<20 t
From Freshwater Catch	✗	✗	
Chilled fish/crustaceans:	✗	✗	
Frozen fish/crustaceans:	✗	✗	
With other preservation:	✗	✗	
From Marine or Freshwater Aquaculture 1)			
Chilled fish	✗	✓	
Chilled crustaceans:	✗	✓	<50 t
Frozen fish	✗	✓	<50 t
Frozen crustaceans:	✗	✓	<50 t
Fish/crustaceans with other preservation:	✗	✗	
Live Bivalve molluscs: 1)	✗	✗	
Frozen raw or cooked products of bivalve molluscs, echinoderms, tunicates and marine gastropods: 1)	✗	✗	
1) Note: Special requirements applicable to monitoring of residues, contaminants and toxins in the these types of products are not covered by this questionnaire			
BASIC COUNTRY INFORMATION			
<p>Please Provide a Map of the country, including indications of <i>District borders</i> <i>Offices of the Competent Authority (cities on central and regional level)</i> <i>Stations/Areas for aquaculture</i> <i>Fishing harbours and landing sites</i> <i>Freshwater rivers and lakes used for fishery production</i> <i>All laboratories designated to carry out official testing</i></p> <p>Please provide information on expectations for the next 5 years (qualified estimates will be adequate) <i>Number of freezer vessels that would comply with requirements for export to EU: 0 – will depend on licensing agreements</i> <i>Number of factory vessels that would comply with requirements for export to EU 0 - will depend on licensing agreements</i> <i>Number of fish processing factories that would comply with requirements for export to EU: <6</i> <i>Number of landing sites to be used for landing of raw materials intended for export to EU:2 – 4</i></p>			

LEGISLATION CONSIDERED TO PROVIDE ADEQUATE HEALTH GUARANTEES (AT LEAST EQUIVALENT TO EU REQUIREMENTS)	
Please list by name and number the national legislation that provides mandates and requirements at least equivalent to EU requirements:	
<i>Actual EU Document and requirement</i>	<i>“Country” Document(s) that provides the same requirement or mandate. Please give type, number, date and title of the document. If there is no such document, please write “NO Document”</i>
Regulation (EC) 882/2004, article 4 and Regulation (EC) 854/2004 article 11 and article 12 A named institution (Ministry, Department etc.) shall be given the mandate/responsibility to conduct official control and monitoring of export of fisheries products to the EU (therefore becoming the Competent Authority)	Fisheries Act 2007: Art. 58 – 60,.
Regulation (EC) 178/2002 article 17 A named Competent Authority shall be given the mandate/responsibility to establish hygiene and food safety legislation to be observed by fish processing operators looking to export to the EU.	Fisheries Act 2007: Art. 58 – 60.
Regulation (EC) 178/2002 article 17 A named Competent Authority shall be given the mandate/responsibility to establish hygiene and food safety legislation that is to be observed by primary producers (aquaculture and fishing vessels) looking to supply raw materials to establishments listed for export to the EU.	Fisheries Act 2007: Art. 58 – 60; Aquaculture Product Regulations
Regulation (EC) 882/2004 articles 8, 9, 10 The designated Competent Authority for fishery products intended for export to the EU shall implement official control and monitoring activities according to documented procedures and adequate methods and techniques (inspection, sampling and testing).	Fisheries Act 2007: Art. 58 – 60.
Regulation 854/2004 article 12, point 1c. The designated Competent Authority or other authority shall be given the power to enforce sanctions on establishments that do not comply with requirements for export to the EU.	Fisheries Act 2007: Art. 58 – 60.
Regulation (EC) 852/2004, article 4, 5 and Annex I Hygiene conditions to be observed by fish processing operators looking to be listed for export to the EU	Fisheries Act 2007: Art. 58 – 60, Fishery Products Regulations to be gazetted.
Regulation (EC) 852/2004, article 4, 5 and Annex I Hygiene conditions to be observed by Primary Producers (aquaculture and fishing vessels):	Fisheries Act 2007: Art. 58 – 60; Fishery Products Regulations to be gazetted; Aquaculture Product Regulations.
Regulation (EC) 2073/2005 Specific microbiological criteria for fish products	Fishery Products Regulations to be gazetted.
Regulation (EC) 1881/2006 as amended MRLs (maximum residue limits) of environmental contaminants (e.g. heavy metals and pesticides)	Fishery Products Regulations to be gazetted.
MRLs (maximum residue limits) of residues of veterinary medicines:	Fishery Products Regulations to be gazetted.
Regulations on authorisation, distribution and use of veterinary medicines:	Fishery Products Regulations to be gazetted.
Regulation on control of feed (production and import of feed):	Fishery Products Regulations to be gazetted.
*) This information shall be given only if the country aims to export fish products with raw material obtained from aquaculture to the EU	

NOMINATION OF COMPETENT AUTHORITY	
Please provide information on the agencies designated to undertake the following official control activities:	
Official Control activity	Department of State for Fisheries and Water Resources Fisheries Department 6, Marina Parade, Banjul
Registration, inspection and listing (approval) of fish processing factories for export (to the EU or with potential of export to the EU)	Institution contact details: Address: 6 Marine Parade, Banjul, Gambia Tel: 220 422 3373, 220 420 1515 Fax: Name of the Director: DAMPHA , Nfamara Jerro E-mail of the Director: jerro@ganet.gm gamfish@gamtel.gm
Registration and inspection of fishing vessels that will supply raw materials to factories for export (to the EU or with potential of export to the EU)	Institution contact details: Address: 6 Marine Parade, Banjul Tel: 220 422 3373, 220 420 1515 Fax: Name of the Director: DAMPHA , Nfamara Jerro E-mail of the Director: jerro@ganet.gm gamfish@gamtel.gm
Issuing of Health Certificates (for consignments intended for export to the EU)	Institution contact details: Address: 6 Marine Parade, Banjul Tel: 220 422 3373, 220 420 1515 Fax: Name of the Director: DAMPHA , Nfamara Jerro E-mail of the Director: jerro@ganet.gm gamfish@gamtel.gm
Laboratory Services	Institution contact details: Food Hygiene and Quality Control Laboratory at Fisheries Department Address: 6 Marine Parade, Banjul Tel: office - 220 422755; mobile - 220 9998935 Fax: Name of the Director: Mohamed A. Hafeeze E-mail of the Director:
Control of Veterinary Medicines and Medicated Feed Stuff (if relevant for Export Strategy to the EU)	Unknown
*) This information shall be given only if the country aims to export fish products with raw material obtained from aquaculture to the EU	

ORGANISATION AND HUMAN RESOURCES OF THE COMPETENT AUTHORITY*Organisational Structure and the Competent Authority:*

The head of the Food Hygiene and Quality Control Laboratory at Fisheries Department reports directly to the Director of the Fisheries Department of the Department of State for Fisheries and Water Resources. There are no regional/district offices – the Gambia is a small country.

Number of staff involved in Official Control at both central level and regional/district levels:

IMPLEMENTATION OF INSPECTION (PLANNING)

Please tick off the most appropriate answer to the questions below and provide additional information if needed.

Inspection and audits take place according to Periodic planning (e.g. annually): Yes ✓

Inspection frequencies are based on risk classification of different type of operations (e.g. different frequencies for high risk and low risk products and for large and small companies): No ✗

Inspection is carried out in reference to written and standardised work instructions, e.g.

Inspection Check Lists: List exist but do not appeared to be always followed

Written Guidelines: Provided by SFP but not officially adopted

Standard Reports for results: Unknown

Standard Reports for data collecting: Unknown

Sampling and testing of raw materials and products for organoleptic quality, freshness, histamine, environmental contaminants, parasites etc. is carried out according to a written sampling plan:

No sampling/testing currently done

INDEPENDENCE OF OFFICIAL CONTROL SERVICES

Please tick the Yes or No answers below:

- Officers involved in official control are employed under contract with the Competent Authority only and are not allowed to be otherwise employed: *Unknown*
- Officers involved in official control and/or their families are not allowed to engage in any private business in the field of producing and testing raw materials and fish products for export to the EU: *Unknown*
- The fees for official inspection and testing activities and for export certificates are not directly collected by the inspector or the inspection agency: *Unknown*

Describe measures or procedures that are in place (if any) to ensure that inspectors are able to make decisions on food safety (for example approval of establishments) without being subject to external pressures (e.g. political or social influences). *No such measures known to be in place*

QUALITY MANAGEMENT WITHIN THE COMPETENT AUTHORITY (PROCEDURES)

Please tick Yes or No to the questions below:

Does the Competent Authority (CA) have written procedures for the following key activities related to official control of fishery products intended for export to the EU: *Unknown*

Registration and Approval of establishments to be listed for export to the EU: *Unknown*

Verification (Inspection) of establishments (freezing vessels, factory vessels, cold stores, processing) already or to be listed (approved) for export to the EU: *Unknown*

Pre-export verification, including document check and sampling and testing, prior to the issuing of a Health Certificate for consignments intended for export to the EU: *Unknown*

Issuing of a Health Certificate for consignments intended for export to the EU: *Unknown*

Actions to be taken following official control (in case of non-compliance with stipulated requirements): *Unknown*

Assignment of inspection and sampling teams for official control: *Unknown*

Registration of primary producers (fishing vessels and aquaculture farms), landing sites and harbours which produce, store or handle raw materials intended for export to the EU: *Unknown*

Verification (inspection) of the compliance of registered primary producers, landing sites and harbours with EU requirements: *Unknown*

Planning and implementing a monitoring programme for residues of veterinary medicines and environmental contaminants in products originating from aquaculture (if relevant): *Unknown*

Assignment of official laboratories: Yes ✓

Verification of official laboratories' performance (internal audit): *Unknown*

Evaluation of competence and training of new staff and staff already employed: *Unknown*

Management (Updating and distribution) of written procedures and the results of official controls: *Unknown*

Handling of complaints from the export markets (e.g. rejection at border inspection posts or complaints following sampling and testing in the export markets): *Unknown*

COMPETENT AUTHORITY FINANCIAL RESOURCES

What is the cost recovery mechanism (if any) applied to finance the cost of official control of products intended for export to the EU? *Unknown*

- Establishments pay a general fee to maintain the listing for export to EU: *Unknown*
 - Establishments pay a fee every time a inspection and sampling activity is carried out: *Unknown*
 - Establishments pay a fee every time laboratory testing is carried out: *Unknown*
 - Establishments pay a fee for the issuing of Export Certificates (EU Health Certificates): *Unknown*
 - Other mechanisms (please describe)
- _____
- _____

- No mechanisms in place for this purpose

How and to whom is the fee mentioned in section 8.1 paid? *Unknown*

- Directly to the institution in charge of the control activity upon invoice
- To the inspector at time of conduction of the activity
- Periodically to the government/ministry in charge of the Competent Authority
- Included in general taxes paid by the establishment

Financial resources for official control:

Total Budget for 2009: *Unknown*

TESTING LABORATORY SERVICES	
Laboratories nominated (or to be nominated) to provide testing services for the purposes of official control and provide the information requested. If more than one laboratory is designated for official testing, please make one list for each laboratory.	
<i>Laboratory name address and contact details</i>	<i>Performance and service</i>
<ul style="list-style-type: none"> Hygiene and Quality Control Laboratory, Fisheries Department, Department of State for Fisheries and Water Resources 	<i>Accreditation Status:</i> Unknown <i>ISO 17025:</i> Yes <input type="checkbox"/> No <input type="checkbox"/> <i>Other Standard:</i> Yes <input type="checkbox"/> No <input type="checkbox"/> <i>(if yes, other standard is mentioned)</i>
<ul style="list-style-type: none"> Public Health Laboratory (microbiology) Water Quality Laboratory 	<i>Parameters and analytical methods which the laboratory is assigned to make:</i>
<u>Fishery products</u>	
E. Coli (ISO TS 16649-3):	Yes <input type="checkbox"/> * Yes, but another method <input type="checkbox"/>
Staphylococcus (EN/ISO 6888 1 or 2):	Yes <input type="checkbox"/> * Yes, but another method <input type="checkbox"/>
Salmonella (EN/ISO 6579):	Yes <input type="checkbox"/> * Yes, but another method <input type="checkbox"/>
Cd (EC Regulation*):	Yes <input type="checkbox"/> Yes, but another method <input type="checkbox"/>
Pb, (EC Regulation *):	Yes <input type="checkbox"/> Yes, but another method <input type="checkbox"/>
Cd (EC Regulation *):	Yes <input type="checkbox"/> Yes, but another method <input type="checkbox"/>
Histamine:	Yes <input type="checkbox"/> Yes, but another method <input type="checkbox"/>
Dioxin and PCB's (EC Regulation*): Benzo(a)pyrene (EC Regulation *):	Yes <input type="checkbox"/> Yes, but another method <input type="checkbox"/>
Potable Water	Yes <input checked="" type="checkbox"/> Yes, but another method <input type="checkbox"/>
Coliforms and E. Coli (ISO 9308-1):	Yes <input type="checkbox"/> Yes, but another method <input type="checkbox"/>
<i>Pseudomonas Aeureginosa</i> (EN ISO 12780):	Yes <input type="checkbox"/> * Yes, but another method <input type="checkbox"/>
<i>TPC, 22 C and 37 C (ISO 6222): Cl.</i>	Yes <input type="checkbox"/> * Yes, but another method <input type="checkbox"/>
<i>Perfringens, incl. spores:</i>	Yes <input type="checkbox"/> * Yes, but another method <input type="checkbox"/>
<i>Chemical parameters (EC 83/98 Annex III):</i>	Yes <input type="checkbox"/> Yes, but another method <input type="checkbox"/>
*) Regulation (EC) 333/2007 and EC Dec. 657/2002+ Guidelines for the Implementation SANCO 0895/2007 and SANCO 2004/2726 rev2	
Is this laboratory designated as an Official Reference Laboratory for any of the parameters mentioned above? Unknown	

SCHEDULE 3

Country situation – Fishery Products Health Conditions	
Country : The Gambia	
Last review	

V. SFP Programme background

The objective of the Strengthening Fishery Products Programme (SFP) is to improve the access of fish products from ACP countries to export markets. This can be achieved by further reinforcing of the phytosanitary conditions relating to the processing, storage and transport of fish in the producing countries. A particularly important objective of the SFP Programme initiative is to ensure that fish products from the artisanal/small scale fisheries of these developing countries are not excluded from global markets that increase national social welfare benefits.

The dependence of the ACP states on the markets of the EU is well established: demand for fish products in the EU exceeds the productivity of Community-based fishery resources to supply them. However, it is recognized that many of the ACP states face constraints on their ability to supply fish products that are in international demand while at the same time they are faced with the need to satisfy domestic demand for the same or similar products. The continuing challenge of domestic demand for fish products to ensure national food security and the need to export fish products to earn much-needed foreign exchange requires careful management. This problem is exacerbated by the continuing increases in national population size in the respective countries.

The SFP programme was conceived with the objective of providing technical support to the ACP countries through the actions of four programme modules. These modules address different technical areas each of which is required for fisheries development. At the same time the activities of the four modules are closely coordinated to ensure maximum sector-wide effectiveness. The programme has been active for seven years during which time the nature of the activities that have been addressed has evolved to respond to national demands and to reflect the difficulties in their execution.

Throughout the programme the four technical modules have been committed to providing advice and support to the relevant 'Competent Authorities', their food safety and quality laboratories and associated technical institutes, national industry groups and individual companies - especially those in the artisanal fisheries.

VI. Summary of issues originally identified by the SFP (all Modules) :

- **Institutional Issues**
 - Technical Capacity – *there remains a need for training in operational and planning activities*
 - Failure to document inspections – *endemic problem – no real excuse*
 - Failure to implement conventional suite of product safety and quality tests – *result of a number of difficult operational issues – lack of power to insist staff perform, deficient past practices, etc.*
- **The Commercial Sector – The Fishing Industry**
 - Failure to implement product formal monitoring with archiving of results/reports
 - Failure to adopt/implement HACCAP procedures – poor understanding or what critical control points are
 - Need for limited, but important upgrading of plant to satisfy processing standards' requirements, especially repairs to, or replacement of, tiled surfaces
 - Collapse of national fish exporting capacity and national processing sector – the most critical & essential that there is good understanding why – otherwise there will be no resolution of the other problems
 - Gambia seems to be failing to gain competitive advantage over Senegalese fishermen in their own country – a problem that remains to be addressed at other than a policy level
- **National Strategy and Management**
 - Good objectives but often little, if any, associated strategy and no implementation plans/programme
 - No control/constraints on effort/entry into the fishery is a major (the major?) management concern. This also prevents monitoring any boat that is not in compliance with any regulatory requirement
 - No operational species/stock specific management plans – with consequential institutional and operational implications
- **Socio-economic Issues and Problems**
 - Continued entry of workers into the fisheries that act as an 'employer of last resort' for new fishermen – reduces incomes, removes incentives for 'responsible fisheries' (instead competition for limited resource)
 - Issue of maximizing creation of wealth or managing fishery at its 'lowest common denominator' resulting in an industry unable to fund the requirements for producing safe and good quality products.
- **Safety and Quality Issues**
 - No laboratory analyses for biological, chemical or contamination of fish products
 - Inspection procedures not properly documented nor are inspection reports archived in a useable manner
 - Existing laboratory facilities, while not wholly ideal are insufficiently used.

VII. SFP answer to main issues by providing:

Support to the Competent authorities and governmental offices: the SFP has undertaken the following.

- *Technical Assistance Report 20/06/04/AWA:*
 - Drafting of post-harvest fishery product legislative tools adapted to the specific country legislative protocols
 - Auditing of factories and facilities in collaboration with the national authorities for 'compliance'. New plans were prepared and changes suggested for every factory.
 - Hands-on trainings organized for inspectors and quality managers for fishing vessels, landing-sites and processing plants to achieve standards' compliance.
 - Advice provided to the CA on the quality and safety of the potable water and distribution systems.
 - Environmental Impact Assessment studies (EIA) undertaken of agriculture practices, use and import of pesticides during the last 50 years, actual and potential contaminants from industry and mining, urban waste disposal systems. Publications in the country at universities and environmental institutes were evaluated.
 - Assisting in the placing of The Gambia on the list for export of Aquaculture Products together with training was provided in relation to the interactive DG SANCO website to plan the RMP.

- *Identify Further Needs Mission Reference: ART014GMB*
 - Evaluated of fishing boat hygiene conditions and measures to preclude contamination
 - Raised awareness of fishermen and other operators and workers on the need for adequate hygiene conditions, on board and at shore
 - Assessed of fish quality and risk of contamination up to the factory deck
 - Determined the scope for improving hygiene and preservation by the provision of materials and tools (engines, fishing gear, insulated boxes
 - Evaluated the level of availability of ice and proper landing places
 - Assessed needs for training and extension to promote hygiene and better fish preservation
 - Clarified the benefits of an artisanal vessel registry.

- *Training of lead personnel of small-scale fishermen's groups at landing sites in basic socio-economic matters in Gambia: ART017GMB*
 - Training undertaken based on manuals and PowerPoint presentations developed by Module 4 projects ART025GEN and ART026GEN at four fish landing centres on the Atlantic Coast.
 - Fishing associations assessed in terms of their management circumstances and abilities
 - Advice given to ensuring understanding of the current needs for fishing association re-organisation.
 - Presentations given on purpose, design and development of business plans in plenary and at a fishery-association level
 - Programme results reviewed Fisheries Department management and the Permanent Secretary of the Ministry of Fisheries, Water Resources and National Assembly Matters.
 - Four site-specific fishery association business plans developed, both as a training exercise and beginning of preparation of such management documents.
 - Training in budgeting methods using spread sheet techniques.

- *Assessment of industry compliance and determination of assistance needs in the Gambia: IND009GMB*
 - Assessed regulatory compliance of factory designs and layouts with prevailing EU sanitary
 - rules and to proposed necessary adjustments

- Advised upon operational procedures (pre-requisite programmes) of fish processing establishments
- Assessed companies self-control systems (HACCP based)
- Evaluated technical capacity of companies' staff and identified additional training requirements
- Assessed needs for business plans and sources of investment finance
- Drafted TORs for complementary interventions under the SFP Programme framework
- Workshop held on
- Advice provided to the Competent Authority
- Operations of shrimp aquaculture farm and hatchery reviewed
- New fish market - Bikama - reviewed
- Fisheries Laboratory, Department of Fisheries Banjul, assessed.

VIII. SFP interventions (list of available reports) :

Competent Authority	Laboratories	Industry	Artisanal fisheries
IND009GMB	20/06/04/AWA	IND009GMB	ART014GMB ART017GMB
CA39		IND052GMB INDO9	ART14

IX. Today's problems and suggestions/ proposals for resolving them :

The fisheries sector in The Gambia manifests a range of deficiencies across a wide spectrum of issues.

Institutional

- Failure to implement much-needed policy objectives - most specifically failure to limit entry of additional fishing effort into the fishery (see next point).
- Failure to license individual fishing boats: this is necessary to monitor and ensure compliance with vessel-specific product-handling requirements. This also means that license revenues cannot be collected that could otherwise be used to fund fisheries management.
- Apparent failure to enforce existing conservation regulations
- Failure to sell onto the highest-paying outlets at least for species accepted on these markets – soles, certain finfish and crustaceans.
- Failure of government to address adequately reasons for commercial failure of the fisheries sector – consequentially as yet no start to identifying solutions and moving towards their implementation.

Processing Industry

- Absence of profitability in the processing industry – possibly in part caused by past over-expansion in the number of plants that is appropriate for the size of The Gambia – is a fundamental problem. This contributes to the wide range of symptomatic problems identified by the respective missions. Only one plant is still exporting of the seven given in the EU “List in Force”.
- Lack of profitability in the industry has resulted in an inability to invest in:
 - Appropriate plant maintenance and ongoing upgrading of plant fabric
 - Re-direction of management time and energy to issues relating to company survival and away from issues of ensuring/increasing product quality and safety, much less optimal marketing.
- The Atlantic coast Fish Landing Centres are emerging from a period in which their finances were misappropriated. They suffer severe shortages of working and investment capital that constrains their ability to exploit operational and market opportunities. No satisfactory government strategy or programme is evident that will address this problem.
- The opaque nature of who owns Landing Centre assets complicates operation of the landing centres along commercial lines.
- There is a major socio-economic reliance on production of smoked fish whose quality would fail health safety requirements – particularly polycyclic aromatic hydrocarbons (PAHs): however, this sector remains vibrant driven by abundant supply of raw material and strong market demand, health concerns notwithstanding, both for consumers and those who undertake the production of the smoked fish (in dangerously unacceptable conditions of smoke pollution). No solutions are yet evident for addressing this problem.
- Though not explicitly investigated, the smoked small-pelagics sector must result in undesirable environmental impacts through its requirements for firewood

Artisanal Sector

- The ‘pirogue’ traditional design of fishing vessels in The Gambia is highly entrenched, yet it does not facilitate use of ice boxes, which is essential if the potential value of the catch is to be fully realized.
- Day boat fishing, the most common method used by the Gambian fishermen is often done without ice: these needs to be addressed by a change in vessel design and/or introduction of ice boxes on the pirogues.

- Unloading of catch from pirogues is done in unhygienic circumstances, yet a satisfactory solution to this problem remains to be identified given the size of landings, the number of vessels involved and the level of acceptance of existing practice.

Proposals for Resolving Problems

- Create a profitable fish processing sector possibly through developing e.g., a consortium of fish producers to resolve the sub-threshold level of existing operations.
- Enhance management capability of the Fish Landing Sites/Fishing Associations and assist in ensuring their re-capitalization
- Provide directed assistance to the Fisheries Department so that it fulfills its mandate in the field of product safety and quality assurance, much of which is possible with its existing resources.
- Provide carefully targeted training assistance to the industry with product processing and storage.

X. MAJOR CONSTRAINTS IDENTIFIED

- Collapse of processing sector because of lack of profitability caused by:
 - Inadequate company capitalization (working capital and investment capital)
 - Small-size precludes access to most profitable markets and makes
 - Reliance on business partners that are often unreliable, do not pay or can dictate terms of business
- Processors have struggled to meet EU standards with an unacceptable number of product recalls
 - HACCP deficient or lacking
 - Inadequate or lacking documenting of product lots prevents necessary traceability of production lots and
 - Inexperience in dealing with product recalls engenders risk of being unable to deal with situations where product quality requires its effective recall.
- Artisanal sector significantly failing to realize its potential for adding value because of,
 - Use of a vessel (i.e. pirogue) design that while highly accepted inhibits attempts to upgrade at-sea product handling
 - Lack of access to markets other than through exporters operating from Senegal, if at all
 - Not all sites have access to ice; in many cases use of which, especially for high-value species, is inadequate
- Fish Landing Centres, while recognized as being of major socio-economic importance,
 - Lack operating and investment capital to the point that they are becoming non-functional in regard to core activities, such as provision of ice
 - Operate at least partially in a government policy vacuum
 - Have a confused management structure between government and the local fishermen's associations and thus
 - Require a coherent operating and investment policy, development of good business plans and assistance to their management in their implementation
 - Management requires support in training and methods of business administration.
- The Department of Fisheries must:
 - Implement/upgrade, as appropriate, the inspection of fish processing plants and fish landing sites
 - Adopt/enforce appropriate documentation of inspections
 - Archive reports in a computer database that allows effective and efficient interrogation
 - Provide training as required though it does not appear that this is the limiting constraint
 - Start product testing for safety and quality *to the best of the Department's capabilities*: this will provide a basis for identifying where assistance is needed in laboratory practices and the nature of the necessary improvements.
 - Implement standard fisheries management methods (e.g. licensing of vessels, stock-specific management plans, enforcement of conservation regulations).

Annexes

- **COUNTRY PROFILES**
- **SFP ADDRESS BOOK**

<u>List of contacts:</u>		
<u>Organisation</u>	Name	Contacts : telephone , email
Banjul Community Fish Association	JAGNA , Biram (Chairman)	994 7334
	SANNEH , Momodou Lamin (Manager)	771 1831
	Salifu Ceesay (Operations)	
Dept. of State for Fisheries, Water Resources and National Assembly Matters	SAINE , Amadou (Permanent Secretary)	220 422 8216, Ab.saine@yahoo.com
Department of Fisheries	DAMPHA , Nfamara Jerro (Director)	220 422 3373, jerro@ganet.gm gamfihs@gamtel.gm
	JOBE , Ousman Mass (Principle Fisheries Officer)	220 420 1283, omassjobe@yahoo.com
	NJIE , Momodou (Food Technologist)	220 422 3345, chonobamodado@yahoo.co.uk
	Adama Sanneh (Extension Officer)	
Gunjur Community Fisheries Project	TOURAY , Alieu Nyakassi (General Manager)	771 1023
	Adama Sanneh (Fisheries Officer)	
	Alieu Jabang (Accountant)	
Tanji Community Fisheries Project	SARR , Baboucarr (General Manager)	220 9 928 199
	Gibou Njie (Accountant)	
	Bdoulie Njie	

National Association of Artisanal Fisheries Organisations	Dawda F. Saine (Executive Secretary)	
Rosamond Trade Co. Ltd	MAHONEY , Rosamond (Owner)	220 422 8222, Rosamondtrade2003@yahoo.com
Kendaka Food and Int.	SINYIAN , David	991 7902

- **Acronyms:**

ACP : African, Caribbean and Pacific countries

EU : European Union

PAHs : Polycyclic Aromatic Hydrocarbons

SFP: Strengthening Fishery Products Programme