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Directorate F - Food and Veterinary Office

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FINAL REPORT OF A MISSION CARRIED OUT IN TURKEY FROM 20 OCTOBER TO 29 OCTOBER 2008 IN ORDER TO EVALUATE THE CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION OF FISHERY AND AQUACULTURE PRODUCTS INTENDED FOR EXPORT TO THE EUROPEAN UNION

Please note that factual errors in the draft report have been corrected in response to comments by the Competent Authority.

Executive Summary

This report describes the outcome of an inspection carried out by the Food and Veterinary Office (FVO) in Turkey from 20 to 29 October 2008. The objective of this mission was to assess whether the organisation of the Turkish Competent Authority (CA) and the implementation of national provisions, against which the Turkish CA controls fishery products (FP) intended for export to the European Union (EU),meet the Community requirements. This includes controls on aquaculture products.

The CA has put in place a clear and systematic control system, with regular checks and frequent pre-export testing. The establishments visited were overall in a satisfactory condition. The CA takes the necessary enforcement and follow up actions towards deficiencies (except in wholesale markets, at the time of the mission not involved in the export chain) . There are, however, significant deficiencies, such as lack of adequate controls on histamine, no control of vessels and lack of effective controls on HACCP plans. During the mission, the CA indicated its willingness to address the deficiencies, and started to take corrective action. Overall, although there are some areas of concern, potential risks are mitigated by the general guarantees provided by the Turkish control system. The report addresses to the CA a number of recommendations aimed at rectifying identified deficiencies and enhancing the control system in place.

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ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

Abbreviation	Explanation
As	Arsenic
CA	Competent Authority
CCA	Central Competent Authority
Cd	Cadmium
EC	European Community
EU	European Union
EU list	A list of facilities approved by the Turkish CA for participation in the EU FP export chain.
FBO(s)	Food Business Operator(s)
FP	Fishery Products
FV	Factory vessel
FVO	Food and Veterinary Office
GDPC	General Directorate of Protection and Control
HACCP	Hazard Analyses and Critical Control Point
Hg	Mercury
ISO	International Organisation for Standardisation
MARA	Ministry of Agriculture and Rural Affairs
MT	Mission Team
Pb	Lead
RASFF	Rapid Alert System for Food and Feed
SANCO	Health and Consumer Protection Directorate General of the European Commission
Sn	Tin
TVB-N	Total Volatile Basic Nitrogen
ZV	Freezer vessel

1 INTRODUCTION

The mission took place in Turkey from 20 to 29 October 2008 and was undertaken as part of the FVO's planned mission programme.

The MT comprised three inspectors from the FVO and one national expert.

2 OBJECTIVES OF THE MISSION

The objective of the mission was to assess whether the organisation of the CA and the implementation of national provisions, against which the Turkish CA controls FP (including aquaculture) intended for export to the EU, can be considered as at least equivalent to Community requirements.

2.1 PROCEDURE OF THE MISSION

In order to achieve this objective, the mission team evaluated the organisation of the CA and its capacity for implementing provisions considered as at least equivalent to the relevant Community legislation.

In pursuit of the mission's objective, the MT proceeded as follows:

- An opening meeting was held on 20 October with the Central CA (CCA), the General Directorate of Protection and Control (GDPC) of the Ministry of Agriculture and Rural Affairs (MARA). At this meeting the inspection team confirmed the objective of and itinerary for the mission, and requested additional information required for the satisfactory completion of the mission.
- The following sites were visited:

Competent authority visits		
CA	3	provincial offices
Laboratory visits		
FP, potable water	2	
Primary production		
Aquaculture farms	1	
Vessels	1	
Wholesale market	1	
Food processing facilities		
Establishments	5	

- Representatives from the DGPC accompanied the MT during the whole mission.

3 LEGAL BASIS FOR THE MISSION

The mission was carried out in agreement with the Turkish Authorities and under the general provisions of Community legislation and, in particular:

- Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules, Article 46;
- Commission Decision 98/140/EC of 4 February 1998, laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in third countries.

All legal references relevant for this mission are listed in Annex 1. Legal acts quoted refer, where applicable, to the last amended version.

4 BACKGROUND

Turkey is currently listed in the most recent amendment to Decision 2006/766/EC as regards the list of third countries and territories from which imports of fishery products in any form for human consumption are permitted. The previous mission to Turkey with this specific scope was DG SANCO/1296/2000, and can be found in the following website:

http://ec.europa.eu/food/fvo/ir_search_en.cfm

Imports of FP from Turkey into the EU are authorised from 97 establishments and four freezer vessels (ZV). According to the Turkish authorities exports to the EU in 2006 amounted to 36,234 tons (mainly seabass, seabream and trout from aquaculture, and anchovy)

From 2005 to October 2008 six RASFF notifications have been triggered by FP imports from Turkey.

5 MAIN FINDINGS

5.1 LEGISLATION

The relevant Turkish legislation is currently being redrafted with a view to convergence with the *acquis communautaire*. For instance a new Hygiene Law has been drafted in order to harmonise the national legislation with the requirements of the Community's "hygiene package" (A body of legislation consolidating Community rules in relation to food safety which became applicable in the EU on 1 January 2006).

Additionally there are a number of other legislative amendments in the process of being adopted, such as:

- Draft Regulation on the Marketing Standards and Consumer Information on FP
- Draft Communiqué on Microbiological Criteria.
- Draft Circular on the Hygiene Requirements During and After Landing from Vessels

The existing legislation, together with the instructions applicable specifically to establishments exporting to the EU, provide an adequate legal framework to enable exports to the EU meet the relevant Community requirements.

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5.2 COMPETENT AUTHORITY PERFORMANCE

5.2.1 Structure and organisation of the CA

The GDPC is the Turkish CA, working under MARA. The GDPC is comprised of eleven departments of which the Department of Fishery Products is responsible for sanitary controls of FP.

Below national level, there are 81 Provincial Agriculture Directorates subordinate to MARA. Of these, the activities related to the scope of this mission are carried out by 30 Provincial Agriculture Directorates and County Agriculture Directorates subordinate to them. Additionally, 16 out of 39 Provincial Control Laboratories and two out of nine Veterinary Control Research Institutes are also actively involved. Also four FP Research

Institutes provide support to the CA.

5.2.2 Competencies and powers of the CA

Under Turkish legislation, the CA is responsible for approval for export of FP establishments, ZV and factory vessels (FV) as well as for the regular monitoring and inspection of all EU listed facilities. The CA, as sanctions for non-compliances, has the power to seize or dispose of FP, and withdraw the authorisation of the establishments.

5.2.2.1 Written procedures

The CA has in place a comprehensive set of written procedures, instructions and checklists which include, among others, the following:

- Various circulars, dealing with subjects such as Water Quality Control in Establishments, Measures to be taken following RASSF alerts and on Residue Monitoring.
- A FP Quality Control Guide, which provides guidance to inspectors on a wide number of issues, including for instance inspections prior to inclusion in the EU list, checklists to be used, sampling, how to issue export health certificates, HACCP system and its implementation etc.

The checklists were available to the MT, they cover the most important Community legal requirements, including the implementation of HACCP plans. While not specifically referred to, traceability is routinely covered during these checks.

The CCA has published on its web-site both legislation and instructions covering standards and norms for FP. However as the legislation and instructions are continuously being amended to harmonise with Community requirements, there are several instances, e.g. the FP Quality Control Guide, where documents have not yet been updated and therefore contain guidance that was in contradiction with the latest approved rules. The CCA is aware of this potential source of confusion and is planning to update all information in the FP Quality Control Guide within a short period.

The CA informed the MT that a "Good Hygiene Applications Guideline for FP" is being finalised for the sector in cooperation with MARA.

The CA provided the MT with written evidence of actions taken in cases of non-compliances detected during official controls visits. These actions included withdrawal from the EU-list, in cases of severe deficiencies.

5.2.3 Human resources and qualification

The CA inspection service has a multidisciplinary profile. Most of the inspectors met by the MT during the mission were either veterinarians or fisheries engineers. There are a total of 232 inspectors in the Provincial Directorates and nine inspectors working at central level. The CA has organised a training programme covering a wide number of areas, such as legislation, sampling, hygiene and food safety, HACCP and certification. Some of the training sessions have been organised by the CA in co-operation with the European Commission (DG SANCO and TAIEX) and international organisations, such

as FAO. Additional training has been organised in cooperation with some Turkish universities.

5.3 OFFICIAL CONTROLS

5.3.1 Health control and monitoring of production conditions

5.3.1.1 Approval procedures

The CCA has established approval procedures for establishments intending to export to the EU. According to these procedures, after a Food Business Operator (FBO) has submitted an application, the Provincial Directorate conducts an inspection, based on a checklist incorporating a scoring system. If the final score is less than 60% of the total points, the application is rejected until all deficiencies have been corrected. If the score is between 61% and 90%, the inspectors from the CCA carry out an additional check accompanied by Provincial inspectors, and a decision is taken accordingly. If the score is above 90% approval is granted, although the CCA may carry out an additional check nonetheless. The MT noted that this procedure is followed.

The document approving the establishment for export to the EU gives details of the different activities and FP categories authorised for export. Alongside EU approved FP and activities an establishment can also process other FP that is however not authorised for export to the EU. HACCP plans of establishments are evaluated and approved by the CCA as part of initial approval and are evaluated by the CA during the monthly checks.

5.3.1.2 Checks to fishing vessels and wholesale markets

Annex III of Regulation (EC) No 854/2004 of the European Parliament and of the Council requires official controls to include inspections at regular intervals of vessels. In Turkey there is no an equivalent system in place, as sanitary controls of vessels are not yet carried out. The MT was informed by a representative of the CCA that to put in place an inspection system of fishing vessels is one of the priorities of the CA, although this could require some time. At present checks of fishing vessels in Turkey cover other areas, such as fisheries regulations concerning fish size, nets used, season restrictions etc.

At present establishments exporting to EU have to obtain their raw material either from a vessel or a farm, and not through wholesale markets (although here FP are subject to organoleptic checks organised by the CA) . Wholesale market checks are a joint responsibility of the municipal authorities and of the Provincial Directorates of the CA. The municipal inspectors perform the routine supervision, and the Provincial Directorates perform checks based on a specific checklist. The Provincial Directorates may set their own frequency for inspections, taking into account elements such as the fishing seasons. The MT noted that in the inspection reports various deficiencies were repeated. A CA representative acknowledged that at this stage there is no policy of enforcement in wholesale markets but that the CA is trying to improve the situation through dialogue

with the municipalities, that control and organise these markets.

5.3.1.3 Inspections at regular intervals of establishments

The CA (Provincial Directorates) performs monthly checks at every EU listed establishment. Each check is carried out by two inspectors. During these checks the officials assess the situation against the criteria in a checklist based on a scoring system. Depending on the results, and the specific deficiencies noted during the inspection, the Provincial Directorate may suspend production and/or exports for a period of up to two weeks. In consultation with the CCA and following their agreement, this period can be extended, and the approval for export may be suspended indefinitely or withdrawn. The MT noted that this system is respected, and the target for inspections achieved.

The checklist used is comprehensive and covers the relevant sanitary criteria. Although evaluation of traceability as such is not included in the checklist, Turkish legislation has requirements on traceability and this is checked in the context of pre-export controls. In the cases where the MT checked the traceability in the establishments visited, the results were acceptable.

Between 2005 and the mission date there have been RASFF alerts, one for histamine, two due to *Listeria*, one to benzo(a)pyrene and two t o spoiled fish. The CA has a documented procedure to follow in cases of RASFFs, comprising of an investigation at the premises, an evaluation of previous reports, and with the possibility of official sampling also. Depending on the results of the investigation and sampling, the CA may take a number of actions, such as suspending production or increasing the pre-export sampling frequency. The MT noted that this procedure is respected.

In one of the provinces visited the MT noted that an establishment that reportedly ceased all FP production (not only for exports to EU) more than a year ago remains EU listed. Monthly reports for this closed establishment were available, covering some parts of the checklist and reflecting changing deficiencies but with a systematic score of 90 % for each month of 2008. It is to be noted that crucial sanitary criteria, such as good manufacturing practices or HACCP cannot be adequately evaluated where an establishment is not actually in operation. The MT was informed that there were other non-operating establishments on the EU list. Article 12.3 of Regulation (EC) No 854/2004 lays down that CAs of third countries must guarantee that the list of approved establishments is kept up-to-date.

The CA requires all EU listed FBO to operate under a HACCP plan, an equivalent requirement to that in Article 5 of the Regulation (EC) No 852/2004 of the European Parliament and of the Council. Accordingly, all the establishments visited had HACCP plans which had been approved/evaluated by the CA during the approval procedures and inspection visits. The MT noted different inadequacies in these HACCP plans:

- In two establishments fish species with different associated risk were grouped in the same HACCP plan, without specifying all relevant criteria for each species
- In another establishment sulphites were defined as a CCP for frozen shrimp, but they were not monitored accordingly. In fact this FBO only conducted three tests on sulphite levels, to test the formula that was to be used. The last of these tests was

conducted in 2003.

- In another establishment the HACCP plan defined a general biological risk as a CCP, and another chemical risk (for both contaminants and residues) as a CCP. No critical limits had been fixed for the CCP, or in any case neither the FBO nor the Provincial inspector were able to identify them.

In all these cases the HACCP plans had been evaluated as correct by the CA inspectors during the monthly checks, without any further comment or suggestion.

5.3.2 Official controls on fishery products

5.3.2.1 Organoleptic checks

Organoleptic checks by the CA are carried out at wholesale markets, and during the visits to establishments for regular inspections and in the context of export checks. The organoleptic checks as such are often not documented. Concerning landing sites, the CA has inspection facilities in 34 out of 223 landing sites. According to the CA, there would be organoleptic checks on these sites. The MT did not see documented evidence of these checks.

In general the freshness of FP observed by the MT in all establishments and wholesale market during the mission is considered as in line with Community requirements.

5.3.2.2 Parasite checks

During the visits to establishments the CA inspectors are expected to perform checks for the detection of any visible parasites. Those checks were often not documented.

5.3.2.3 TVB-N testing

The MT was informed that, whenever the organoleptic assessment raises doubts as to the freshness of the FP the CA can take samples to control the levels of TVB-N. However this option is rarely used and in one of the laboratories visited the last TVB-N test had been carried out in 2005.

5.3.2.4 Histamine testing

During the mission the MT found no evidence of sampling for histamine, either by CA officials or by the FBOs. Chapter V of Section VIII of Annex III of Regulation (EC) No 853/2004 of the European Parliament and of the Council requires an FBO to ensure that the limits with regard to histamine are not exceeded. For CAs, Chapter II of Annex III of Regulation (EC) No 854/2004 indicates how random testing for histamine is to be carried out to verify compliance with the permitted levels. Until middle October 2008 the CA accepted that the histamine risk for susceptible species was addressed by FBO through temperature-based controls. Only in case of suspicion, would the CA inspector sample

for histamine, following a sampling plan equivalent to that set in Commission Regulation (EC) No 2073/2005.

In October 2008 the CCA distributed an instruction to the Provincial Directorates indicating how random official sampling for histamine is to be carried out and how they should inform FBOs that HACCP plans should be revised to address this issue accordingly. This new system was not operational at the time of the mission. The MT noted in one establishment visited how the FBO had acquired some kits for histamine testing although they had not yet been used.

5.3.2.5 Testing for contaminants and additives

The CA performs sampling for contaminant analyses (mercury (Hg), lead (Pb) and cadmium (Cd)) in FP in the context of export sampling (see section below) as well as for residues in accordance with the Turkish residue monitoring plan.

Regarding wild FP the CA has a Monitoring Programme on Contamination by Heavy Metals of different Fish Species. This includes monitoring arrangements to control the level of Hg, Pb and Cd, and is under the responsibility of the Ministry of the Environment. In this context 278 samples were taken, conducting 1390 analysis, covering different species of fish. The Programme investigated in particular the Marmara Sea, as it was believed that there could be a higher risk in that area. The conclusion was that there was no significant risk for human health. No sampling on canned product for determining the content of inorganic tin (Sn) is performed by the CA or by the FBOs.

The CA through a Circular dated 21 September 2008 recently revised the maximum levels of contaminants allowed in the different FP to harmonise them with those in Commission Regulation (EC) No 1881/2006.

5.3.2.6 Microbiological checks

The CA has the capability to carry out microbiological checks when necessary, and can thereby fulfil requirements equivalent to those in Chapter II of Annex III of Regulation (EC) No 854/2004. In practical terms, this is regularly done in the context of pre-export testing and as part of follow up investigations. In general, the MT saw evidence that the analyses are carried out in accordance with the requirements set by the CA and that the results were satisfactory.

5.3.3 Certification and pre-export sampling

According to the system in place, a FBO should submit, together with the application for export, the Certificate of Origin indicating the origin of the raw material (i.e. vessel, farm etc). Upon receipt of the application, an inspector from the Provincial Directorate will conduct an organoleptic check and sample the consignment if necessary . In cases where the conditions met are adequate, a health certificate is issued. Only specific inspectors included in a certain list can sign the health certificate.

Apart from some minor formatting problems the health certificates are correctly issued

and the procedure above followed.

As an additional guarantee, the inspectors visiting the facility sample the product. The kind of criteria to be tested for is pre-defined in the FP Quality Control Guide depending on the type of product (i.e. frozen, fresh, smoked fish etc). In the cases seen during the mission different microbiological criteria were tested systematically, with testing for heavy metals included in some cases. During the first year since approval all consignments for export are sampled. From then on, until the fifth year, one consignment out of five is sampled. After that period, one consignment in ten is sampled. This frequency may be increased where the CA deems necessary or upon detection of non-compliances or involvement of the establishment in RASFF alerts.

The mission team noted a case where following detection of *Salmonella* in a pre-export sample the CA did not issue the health certificate and performed a follow-up investigation. Although pre-export testing is not a Community requirement, it provides an additional guarantee concerning the sanitary conditions of the exported product.

5.3.4 Official controls on water/ice

The CA performs regular testing of water used in establishments, including sampling at approval stage. This is done following a documented procedure based on Turkish Communiqué 2005/24. The CA inspectors are also expected to review the FBO own checks on water/ice. The MT noted that *Enterococci* as an indicator is not tested for, although this is a requirement under Turkish sampling legislation equivalent to the requirement in Council Directive 98/83/EC.

The MT noted that in one case following detection of excessive levels of coliforms in a sample of water from one establishment, the CA reacted quickly and ordered the establishment to cease production/exports until further tests confirmed that the problem had been resolved.

5.4 LABORATORIES

The CCA responsible for laboratories is the GDPC. Within the GDPC, the Public Health Services Department is responsible for the Provincial Control Laboratories, and the Animal Health Services Department is responsible for the Veterinary Research Institute Directorates. Currently there are 39 Provincial Control Laboratories carrying out analyses on official samples of FP. The laboratories carry out analyses for contaminants such as heavy metals, microbiology analyses, histamine analyses and residue monitoring. However none of them tests for tin (inorganic analyses).

Turkish Accreditation Institution (TÜRKAK) is responsible for the accreditation of the laboratories performing food analyses in Turkey. According to the information provided by the CA, 16 of the official laboratories involved in testing of FP are already accredited. Some of them are in the final stages of the accreditation process. Non-accredited laboratories work under quality control schemes.

Proficiency tests are in general performed for the approved method, although most of them were not carried out in a fish matrix. The results were generally adequate, although not always (i.e. cases of not-satisfactory results for proficiency tests for As and Pb). As

an improvement to the system, the CA is setting up a National Reference Laboratory for Food, now in its final stages of preparation.

The CA has also published a list of private laboratories authorised to perform tests on FP. These private laboratories however are not involved in the pre-export testing scheme.

The CA provides in its circulars and instructions information about which samples are to be submitted to the different laboratories. The MT noted that, while generally correct, there were some inaccuracies in this, as some of the laboratories indicated could not perform particular tests. The MT noted a case where a sample taken in a fish farm revealed levels of enrofloxacine over those permitted under Turkish and Community legislation. According to the instructions provided by the CCA, positive results are to be communicated without delay. This instruction is in line with Article 16 of Council Directive 96/23/EC, which indicates that following positive results the CA shall obtain without delay the results, to enable the CA to identify the farm of origin and take the appropriate measures. However, the laboratory involved in this case routinely sent by normal mail all results, whether positive or not. In this particular case the Provincial Directorate received the notification of the positive result 1 month and 10 days after the results were known. The Provincial Directorate took then a second sample in the same farm, but the batch was different, as the original fish had already been sold. According to the instructions of the CCA, a sample of feedingstuff should have been taken also, but this was not done. A CA representative linked this omission to lack of laboratory capability for this particular test.

5.5 VISITS CARRIED OUT BY THE MT

Fishing vessels

The MT visited one fishing vessel, that could be considered as conforming to Community requirements.

Fish farm facilities

The fish farm facilities visited by the mission team could be considered as in line with Community requirements, and kept adequate records.

Wholesale Market

Although as indicated above the wholesale markets are at present not part of the EU export control chain, the CA has organised official supervision there in order to carry out organoleptic checks. The hygiene conditions were generally adequate, and the fish was fresh. The MT noted the following findings, that would be of relevance if the CA decided to allow participation of wholesale markets in the export chain:

- Lack of lockable facilities for refrigerated storage of FP detained or declared unfit for human consumption. This is a Community requirement in Chapter II of Section VIII of Annex III of Regulation (EC) No 853/2004.
- Presence of numerous wood crates with rusty nails.
- there were four cold stores in the wholesale market visited. None of them had continuous temperature recording devices, although this had been requested on repeated occasions by the Provincial Directorate inspectors;

- The municipal inspectors, working regularly in the wholesale market, had no thermometer to enable them to check the temperature of fish.

Establishments

In general the five establishments visited were generally in compliance with Community requirements, although the MT noted some deficiencies (not all present in every establishment):

- lack of adequate separation between gutting and filleting areas.
- inadequate handling practices such as brushing the fish , dragging them over dirty work surfaces with blood/viscera and washing them in stagnant water .
- storage conditions not allowing correct air circulation.
- wooden pallets used for export stored in the establishment garden, this did not allow adequate protection from pests.
- lack of indication of the presence of sulphites in the labels of crustacean products.
- FBO not carrying out a visual inspection for parasites in a representative sample of mechanically eviscerated fish, as indicated in point 1.b of Chapter II of Section I of Annex II of Commission Regulation (EC) No 2074/2005.

The deficiencies listed above had not been noted in previous CA inspection reports.

6 CONCLUSIONS

Concerning legislation: The CA is in the process of harmonising its legislation with the acquis communautaire. The legislation and instructions applicable to establishments exporting to the EU provides a sufficient legal framework to allow exports of FP to the EU.

Concerning the CA performance: The CA has a clear structure, and has adopted a well documented control system, including guidance. It also has the powers to enforce legislation, including withdrawal from the EU-list. The CA showed evidence of corrective actions taken where necessary. There is some potential for confusion since guidance is not always kept up-to-date. The CA has made a significant effort to provide adequate training to officials. Overall the structure and general control system of the CA has the capability to enforce standards equivalent to those in Community requirements.

Concerning official controls: There are clear and comprehensive procedures for inclusion of establishments in the EU-list. There are at present no sanitary controls on fishing vessels. For establishments, there are frequent checks, and the set frequency is respected. The number of RASFF is low. Non-operating establishments are sometimes maintained in the EU-list. All visited establishments operated under a HACCP plan, but it was not always well designed and supervised. There is a system for checks on organoleptic criteria and parasites, although often these checks are not well documented. At the time of the mission there was no histamine testing carried out either by the FBOs or the CA, although the CA has already started to take measures to ensure adequate testing in the near future. For contaminants, the CA has a monitoring system in place, and the results

are generally compliant, although inorganic tin in canned FP is not yet tested for. There is an adequate certification system, and the CA additionally conducts frequently pre-export testing on different criteria, taking the necessary measures if the results are not in compliance. The CA (and the FBO) carry out checks on water quality, but these do not cover *Enterococci* as indicators. In summary, the system of official controls has many positive elements, although some significant deficiencies are still to be addressed.

Concerning the laboratories: Some of the laboratories are already accredited, with the rest working under quality control schemes. Proficiency tests are regularly carried out, generally with good results. In some cases the slow notification procedure for positive results hinders the efficiency of the system. In summary, the laboratory network works overall in satisfactory conditions, with the caveats indicated.

Concerning the visits carried out by the MT: The premises visited were, overall, in a satisfactory condition, although the MT found some deficiencies at establishment level that had not been detected by the CA, such as inadequate labelling concerning additives.

6.1 OVERALL CONCLUSION

The CA has put in place a clear and systematic control system, with regular checks and frequent pre-export testing. The establishments visited were overall in adequate conditions. The CA takes the necessary enforcement and follow up actions towards deficiencies (except in wholesale markets, at the time of the mission not involved in the export chain) . There are, however, significant deficiencies, such as lack of adequate controls on histamine, no control of vessels and lack of effective controls on HACCP plans. At the time of the mission the CA had already started to take corrective actions, particularly concerning controls on histamine. Overall, although there are some areas of concern, potential risks are mitigated by the generally satisfactory guarantees provided by the Turkish control system.

7 CLOSING MEETING

During the final meeting, held in Ankara, the MT presented its findings and preliminary conclusions to the CCA.

During this meeting, the CCA acknowledged the deficiencies pointed out by the MT, and expressed its willingness to address them.

8 RECOMMENDATIONS

The CA should provide Commission services with an action plan, including a timetable for its completion, within one month of receipt of this report, in order to address the following recommendations for FP exported to the EU:

No.	Recommendation
1	The CA should put in place a system for inspections at regular intervals of the sanitary conditions of vessels, in line with the requirements in Annex III of Regulation (EC) No 854/2004.

No.	Recommendation
2	The CA should ensure that the list of establishments authorised to export FP to the EU is kept up-to-date, in line with requirements in Article 12.3 of Regulation (EC) No 854/2004, establishments not in operation should be excluded from this list.
3	The CA should ensure that FBO have appropriate HACCP plans, in line with Article 5 of Regulation (EC) No 852/2004.
4	The CA should verify that FBO ensure that the limits with regard to histamine are not exceeded, in line with requirements in Chapter V of the Section VIII of Annex III to Regulation (EC) No 853/2004. Additionally, the CA should put in place a system of random testing for histamine, to verify compliance with the permitted levels, in line with Chapter II of Annex III to Regulation (EC) No 854/2004.
5	The CA should set up monitoring arrangements to control the levels of contaminants to ensure that EU export FP do not contain levels of inorganic tin in canned products in excess of those levels laid down in Regulation (EC) No 1881/2006.
6	The CA should ensure that Enterococci are tested for as indicators in the context of water controls, in line with requirements of Directive 98/83/EC.
7	The CA should ensure that laboratories that carry out the analyses of FP and water samples taken during official controls operate taking into consideration the requirements of Article 12 of Regulation (EC) No 882/2004, and the possibility for a derogation provided by Regulation (EC) No 2076/2005 for the accreditation of such laboratories until 31 December 2009.
8	The CA should ensure that laboratory results not in compliance are notified in such a way that the inspection services can obtain without delay all the information required to identify its origin and take any necessary measures, in line with Article 16 of Directive 96/23/EC.
9	The CA should ensure that the deficiencies noted by the MT in establishments are corrected, and in particular, that when additives are used, the CA ensures that all relevant information is forwarded from the Turkish exporter to the importer within the EU so that Article 6.6 of the Directive No 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs, can be complied with. (i.e. in case of use of additives, the label of the foodstuffs to be delivered to the ultimate consumers should indicate the name of the category of the additive used followed by its specific name or EC number).

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/ap/ap_turkey_7644_2008.pdf

ANNEX 1 - LIST OF LEGISLATION REFERENCED IN THE REPORT

Reference	OJ Ref.	Detail
Decision 98/140/EC	OJ L 38, 12.2.1998, p. 14–16	98/140/EC: Commission Decision of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in third countries
Decision 2006/766/EC	OJ L 320, 18.11.2006, p. 53–57	2006/766/EC: Commission Decision of 6 November 2006 establishing the lists of third countries and territories from which imports of bivalve molluscs, echinoderms, tunicates, marine gastropods and fishery products are permitted
Directive 96/23/EC	OJ L 125, 23.5.1996, p. 10–32	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
Directive 98/83/EC	OJ L 330, 5.12.1998, p. 32–54	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption
Directive 2000/13/EC	OJ L 109, 6.5.2000, p. 29–42	Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs
Regulation (EC) No 178/2002	OJ L 31, 1.2.2002, p. 1–24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
Regulation (EC) No 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Regulation (EC) No 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs

Reference	OJ Ref.	Detail
	re-published in OJ L 226, 25.6.2004, p. 3	
Regulation (EC) No 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Regulation (EC) No 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Regulation (EC) No 2073/2005	OJ L 338, 22.12.2005, p. 1–26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Regulation (EC) No 2074/2005	OJ L 338, 22.12.2005, p. 27–59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Regulation (EC) No 2076/2005	OJ L 338, 22.12.2005, p. 83–88	Commission Regulation (EC) No 2076/2005 of 5 December 2005 laying down transitional arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Regulation (EC) No	OJ L 364, 20.12.2006, p.	Commission Regulation (EC) No 1881/2006 of 19 December 2006 setting maximum levels for certain

Reference	OJ Ref.	Detail
1881/2006	5–24	contaminants in foodstuffs