
Taller de Comercio y Medio Ambiente

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A REVIEW ABOUT THE ENVIRONMENTAL REQUIREMENTS FOR CUBAN FISHER PRODUCT EXPORTS.

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1.1 Health protection.

The main requirements for lobster exports is the implementation of an HACCP System (Hazard Analysis and Critical Control Points Analysis), considered the only quality management system, acknowledged as an integral, scientifically-based, and harmonically designed with a preventative control philosophy, capable of contributing with a high degree of efficiency to the food safety of productions. Thus, the international fishery industry has been in the forefront of HACCP implementation, compelled by the importing country requirements.

The operational routines that the Cuban fishery industry has adopted when producing its main fishery resource, lobster, to provide products which do not cause adverse effects on health is the one required by the international legislation in force about these subjects, specifically the European Union Directives. The schedule is the following:

Pre-requisites + Good Manufacturing and Handling Practices + Good Hygienic Practices + HACCP.

Pre-requisites: The requirements that lobster fishing vessel, processing industry or transportation mean must meet, concerning constructive characteristics, inner or outer conditions (i.e., floors, walls, ceilings, doors, windows, ventilation, lightning, pipelines, etc.), water and ice supply, general conditions of technological and refrigeration equipment and other aspects that are covered in the Hygienic Sanitary and Environmental Regulation of MIP as a complement of By Law 164, document taken as a basis of our domestic legislation in force and it is in compliance with the European Union Directives 91/493 and 91/492.

Good Manufacturing and Handling Practices: They are established by means of the Manufacturing Operational Procedures for different productions of lobster. Their aim is to comply with technological enforcement during different stages of the technological process.

The products obtained from lobster intended for export are:

- Live lobster.
- Whole Precooked Frozen Lobster.
- Whole Precooked Chilled Lobster
- Whole Raw Frozen Lobster.
- Frozen Fresh Lobster Tails.
- Frozen Precooked Lobster Tails.
- Frozen Lobster Meat Tails.
- Frozen Precooked Lobster Meat Tails.
- Frozen Precooked Lobster

Good Hygienic Practices: They are key features to assure safety and wholesomeness of products. Globally they are known as SSOP (Standard Sanitary Operational Procedures) and they are included in the domestic legislation in force, in documents such as Hygienic

Sanitary and Environmental Regulation of MIP and in the Cleaning and Sanitizing Programs. In these documents, hygienic and sanitary conditions of fishery plants, fishing vessels and transport means are regulated. Aspects such as treatment to sewage disposal, sanitary facilities, personal hygiene, sanitary barriers and the manner of performing cleaning and disinfecting tasks in different areas of the plant, use of approved detergents y disinfectants and pest control schedule. All these regulations are in line with European Union Directive 93/43.

1.3 Environmental Protection.

With regards to environmental protection, the requirements are covered by the Hygienic Sanitary and Environmental Regulation of MIP and they are concerned with sewage disposal treatment from production lines (liquids and solids) and wastes; reutilization of packaging materials, that constitute a policy both at domestic and international level; utilization of chemicals for cleaning and sanitizing with biodegradable characteristics; utilization and development of clean technologies and the development of new lobster markets with ecological products as live lobster.

2.1 Amount of MIP investments to comply with the requirements.

Regarding the amount of MIP investments for the compliance of requirements we may say that the program begun in 1995 with an estimated total cost of \$42 millions USD, thereof more than de \$20 millions of USD were employed for the sanitary quality and the quality assurance of fishery products. At present, lobster processing establishments have been remodeled. In all the events the technological flow assures a forward sequence of process and it has been segregated clean and unclean areas in plants.

2.2 Economic and ecological advantages of investments.

The economic advantages derived from the investment performed are closely linked to the permanence of the markets where we place our safe and wholesome products and the opening of new ones, with increasing profits year by year of the Ministry that allows economic improvements for the country, in addition to this, it is the contribution of the guarantee when obtaining a high quality level at a minimum cost and the assurance of a process with continuous technological improvements.

There are many ecological advantages, the key ones are linked to the development of clean technological process, new ecological products, biodegradable chemicals for cleaning and disinfecting, processing facilities with environmental license among other features.

3. Description of the investment.

Concerning the description of the performed investment we may say that it was targeted to solve the main constructive and technological problems that caused:

- Cross technological flow.
- Deficiencies in the segregation of clean and unclean areas.
- Floors, walls and ceilings in poor repair.
- Deficiencies in the air tightness of the processing facilities.

- Poor sanitary facilities.
- Unfit materials for the industrial equipment and working tools.
- Limited freezing capacities and restraints for the repair of the existing ones.
- Deficiencies of recording devices. Insufficient ice production.

Building materials used in the plants are certified by ISO 9001 y 9002 standards and they complied with the requirements demanded for food facilities, such as:

- Polyurethane panel of sandwich type, corrosion resistant and electrogalvanised.
- MONILE floors (made with a blending of quartz and high resistance resins).
- Specials epoxy paints for food products.
- Stainless steel sheets and non-toxic plastic resins

Since 1995 to 1998, it has been put into operation 25 new ice-making plants (FRIGOFrance brand name). Ice production has been increased up to 70 000 yearly tons. Freezing technology is Danish (SABROE), Japanese (MYCOM) and German (BITZER)

4- Description of the inspection.

The European Union inspection visit was in charge of the specialists Dr. Volken Thran, from UE and Dr. D.G. Groothuis from Holland. They proved to be highly trained professionals in their job. The visit took place from October 26 to October 31, in accordance with a working schedule proposed by MIP and fully agreed by the visitors, which was developed as follows:

Monday 27: Introduction of the reports by the Minister of the Fishery Industry and the Heads of the Quality Assurance, Industry and Fishery Regulation Directions, as well as the Head of the Fishery Inspection Office. It was handed out questionnaire No. 1 that contained general information about the fishery activity of the country.

From Tuesday 28 to Thursday 30 the schedule covered the following activities in chronological order:

- Visit to the Reference Laboratory located at the Centre for Production of Laboratory Animals (CENPALAB).
- Visit to Live Lobster establishment “Reyna Viva” at Mariel, small plant.
- Interview with the Minister of Public Health, Dr. Carlos Dotres.
- Interview with the Minister of Science, Technology and Environment (CITMA), Dra. Rosa Elena Simeón.
- Visit to Cold Store TERREF from Havana Fishery Port and Export Products Refrigerated Transport.
- Visit to the fishery establishment “Pinar del Rio Fishery Enterprise”, located at La Coloma, big plant.
- Visit to “Isle of Youth Fishery Enterprise”, medium plant.
- Helicopter flight to lobster fishing grounds.

During the visit they received the questionnaires and graphics corresponding to the plants, they could verify the control that MIP exerts as State to assure fishery products safety and wholesomeness exported to the European Union and the interrelationship with the sanitary authorities of our country, MINSAP and IMV and the verification that these entities perform to our Quality Inspection and Certification System.

At their disposal they had the standing legislation for fish and fish manufacturing and they could appreciate its compliance with the Community Directives. It was also proved how fishery facilities operated, the products manufactured in those facilities, the installed technology, constructive and hygienic sanitary conditions of the facilities, the workers health, water quality, pest control and the systems to assure quality of production and its own checks.

According to the visitors opinion, they did not find serious deficiencies. The remarks they made when visiting places were quickly solved, which was shown to the visitors in a second visit to Pinar del Rio establishment and "Reyna Viva" live lobster center. The Minister accompanied them in their visit to Mariel, La Coloma and the Isle of Youth.

The visitors were grateful for the attention and facilities given for their job, they expressed their surprise for the results of the visit and the quick response to the solution to the few deficiencies they pointed out, expressing once more that the final result should be received from Brussels, headquarter of the Commission.

The results of the visit were satisfactory and they are covered in the Decisions 572/98 y 573/98 of the European Union that places our country in the list of countries that may export fishery products to any state of the Union.

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