



# TECHNICAL REQUIREMENTS FOR OFFICIAL CONTROL AND INSPECTION OF QUALITY AND SAFETY OF FISH AND FISHERY PRODUCTS IN CAMBODIA



March 2024





# **FISHERIES ADMINISTRATION**

**March 2024**

Prepared by: The Department of Fisheries Post-Harvest Technologies and Quality Control (DFPTQ), Fisheries Administration in Collaboration with the United Nations Industrial Development Organization (UNIDO)

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## DECISION

The Fisheries Administration (FiA) of the Ministry of Agriculture, Forestry and Fisheries (MAFF) of the Kingdom of Cambodia, as the National Competent Authority for Fisheries affirms its effort and commitment to setting the policies and institutional frameworks to ensure the quality and safety of fish and fishery products for all. To achieve these tasks, FiA has established and improved food safety management and control system for fish and fishery products at all stages of production chain and operations include processing, labelling, storage, distribution, transportation, importation, and exportation in complying with international standards requirements as well as EU standards.

FiA is also to commit to mobilizing all necessary tools and resources to guarantee the required performance in line with the national food safety control system that is already in place, with the intention of continued implementation for a better quality system in the services.

The Technical Requirements for Official Inspection and Control of Quality and Safety of Fish and Fishery Products in Cambodia” was established to align with the ASEAN Principles and Guidelines for National Food Control Systems, and the ASEAN Principles for Food Import and Export Inspection and Certification, as also the relevant national regulatory tools, aiming to meet the specific requirements of potential export markets, including the EU. It also provides the measure for the management and official control that are prioritized the safety and integrity of fish and fishery products in accordance with the World Trade Organisation Sanitary and Phytosanitary Agreements, the relevant international and regional guidelines of the Codex Alimentarius Commission and the ASEAN and take into account any other scientific based requirements on food safety.

This Technical Requirements serves as the essential legal and technical reference for providing clear direction and guidance to the Department of Fisheries Postharvest Technologies and Quality Control (DFPTQ) and Department of Aquaculture Development (DAD) of FiA in carrying out their official control and inspection services. It also provides a comprehensive and structured approach, ensuring a quality and safety of fish and fishery products for protecting consumers' health, protecting environment, and providing fair in trade. This Technical Requirements is currently voluntary in general, while it is mandatory for those food business operators who intended to export fish and fishery products to global markets including the EU.

This Technical Requirements entries into force from the date of signature.

Phnom Penh, Date 22 March 2024



**POUM SOTHA**



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## ABBREVIATIONS

<b>ALU</b>	Analytical Laboratory Unit
<b>AOAC</b>	AOAC International, Association of Official Agricultural Chemists
<b>APHA</b>	The American Public Health Association
<b>ASEAN</b>	Association of Southeast Asian Nations
<b>CAR</b>	Corrective Action Request
<b>CCF</b>	Consumer Protection Competition and Fraud Repression Directorate-general
<b>CQS</b>	Cambodia Quality Seal
<b>DG SANTE</b>	Directorate General for Health and Consumer Protection'
<b>EC</b>	European Commission
<b>DAD</b>	Department of Aquaculture Development of FiA (FCA for Control and management of aquatic animal diseases and hygiene as well as pre-harvest and associated activities)
<b>DFPTQ</b>	Department of Fishery Post-harvest Technologies and Quality Control of FiA (FCA for Control and management of hygiene and human health implication as well as post-harvest and associated activities)
<b>FCA</b>	Fisheries Competent Authority for the control of food safety of fishery products
<b>FDA-BAM</b>	United States Food and Drug Administration, Bacteriological Analytical Manual
<b>FAO</b>	Food and Agricultural Organisation
<b>FiA</b>	Fisheries Administration of MAFF
<b>ISO</b>	International Organization for Standardization
<b>GDCE</b>	General Department of Customs and Exercise (of the Ministry of Economy and Finance)
<b>GHP</b>	Good Hygiene Practices
<b>GMP</b>	Good Manufacturing Practice
<b>GAqP</b>	Good Aquaculture Practices
<b>HACCP</b>	Hazard Analysis and Critical Control Points
<b>MAFF</b>	Ministry of Agriculture, Forestry and Fisheries of the Kingdom of Cambodia
<b>MOC</b>	Ministry of Commerce of Cambodia
<b>NMKL</b>	Nordic Committee on Food Analysis, Norway
<b>NRMP</b>	National Residue Monitoring Plan
<b>RMC</b>	Residue Monitoring Committee
<b>WHO</b>	World Health organisation
<b>WOAH</b>	World Organization for Animal Health
<b>WTO</b>	World Trade Organisation

## TERMS & DEFINITIONS

Term	Definition
<b>Additives</b>	Means any substance not normally consumed as a food by itself and not normally used as a typical ingredient of the food, whether or not it has nutritive value, the intentional addition of which to food for a technological (including organoleptic) purpose in the manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food results, or may be reasonably expected to result, (directly or indirectly) in it or its by-products becoming a component of or otherwise affecting the characteristics of such foods. The term does not include “contaminants” or substances added to food for maintaining or improving nutritional qualities.
<b>Aquaculture</b>	Refers to activities such as breeding, hatching, raising, and nourishing of aquatic animals including fish, molluscs, crustaceans or activities relating to planting and breeding aquatic plants.
<b>Aquaculture Farm (Facility)</b>	Tools, equipment, materials, reservoirs, pond areas, storage areas, that are involved in aquaculture..
<b>Associated Actors</b>	Operations that are an integrated part of the value chain for fisheries products, but not defined as primary or processing facilities (Collection Points, Landing sites, Ice factories, cold stores feed mills, hatcheries, transport, salt production).
<b>Audit</b>	Audit is a systematic and functionally independent examination to determine whether activities and related results comply with planned objectives.
<b>Business Operator</b>	Refers to food business owners or individuals delegated with rights to execute food business or individuals responsible for food business, in accordance with the laws and regulations of the Kingdom of Cambodia, such as producers, processors, packaging traders, wholesale traders, distributors and retailers.
<b>Carry Over</b>	Means a practice in which veterinary medical products, or other substances, unintended are transferred from processing of one batch of feed to another batch, e.g. through process equipment, handling or transport.
<b>Carrier Vessel</b>	Means a vessel designed and used for transfer of fish from fishing vessels or aquaculture farms to a landing site, collection point, auction or processing factory.
<b>Clean water</b>	Means water from any source, including seawater, where harmful microbiological contamination, substances and/or toxic plankton are not present in such quantities that may affect the safety of fish, shellfish and their products intended for human consumption.
<b>Cleaning</b>	Means the removal of soil, food residue, dirt, grease or other objectionable matter.
<b>Collection point</b>	Means a place where activities including receiving from primary production, sorting and icing for further distribution to a processing facility takes place.
<b>Composite products</b>	Means a “a foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin and includes those where the processing of primary product is an integral part of the production of the final product”.

<b>Contamination</b>	Introduction or occurrence of an unwanted organism, taint or substance to packaging, the fishery product, raw material or the food environment. Contamination can include physical, chemical, radiological and microbiological.
<b>Control Measure</b>	Means any action or activity that can be used to prevent, eliminate or reduce a significant food safety hazard to an acceptable level.
<b>Critical Control Points (CCPs)</b>	A step at which control can be applied and is essential to prevent or eliminate a fishery product safety hazard or reduce it to acceptable levels.
<b>Degree days</b>	Is calculated as number of days multiplied with water temperature. 500-degree days divided by the mean temperature of the water in degrees Celsius gives a specific number of days which is typically the withdrawal period.
<b>E-Number or INS Number</b>	Means the International Numbering System for food additives as documented in Codex Alimentarius CAC/GL 36-1989 and adopted by EU as E-number.
<b>Exotic disease</b>	Means diseases of aquatic animals which are not known in the country/zone and the pathogen is not reported in the country waters.
<b>Facility</b>	Means any place where fish and fishery products are received, prepared, processed, chilled, frozen, packaged or stored. For the purposes of this regulation, facilities also include vessels, aquaculture farms, ice factories and places for production, processing and distribution of feed for aquatic animals.
<b>Food Business Premises</b>	Refers to buildings, tents or other structures, either permanent or temporary, built on the ground and the adjacent venues used for production, packaging, transportation, management, service, storage or sale of any type of food.
<b>Feed additives</b>	Production, packaging, transportation, management, service, storage or sale of any type of food.
<b>Fish</b>	Means, for the purpose of these Technical Requirements, any of the cold-blooded fresh water or seawater animals excluding bivalves, echinoderms, tunicates, gastropods, mammals and aquatic plants.
<b>Fishery products</b>	Refers to products that are processed from fish that come from either wild-caught or aquaculture.
<b>Food</b>	Refers to any product or substance, whether processed or semi-processed or unprocessed, for human consumption, and includes drinks, chewing gum, and any substance which has been used in the manufacture, preparation or treatment of food, but does not include cosmetics, tobacco or substances used only as drugs.
<b>Fishing Vessel</b>	Refers to a vessel equipped with fishing gear for fishing. Ref 14
<b>Food chain</b>	Refers to all stages of food production, from initial production to the handling and sale of food counting from farm to table.
<b>Food hygiene</b>	Refers to all conditions and measures necessary to ensure the safety and suitability of food in all stages of the food chain.
<b>Food safety</b>	Refers to the implementation of assurance processes so that food will not cause harm to consumers when taken, prepared or eaten according to its intended uses.

<b>Freezer vessel</b>	Means any vessel on board which freezing of fishery products is carried out, where appropriate, after preparatory work such as bleeding, heading, gutting and removal of fins and where necessary followed by wrapping or packaging.
<b>Good Hygiene Practices (GHP)</b>	Fundamental measures and conditions applied at any step within the food chain to provide safe and suitable food, specifically to establish an environment in fish handling and processing areas, where the risk for contamination from equipment, in-put materials, waste, food handlers, surroundings etc. are minimized for purpose of control of potential food safety hazards.
<b>Good Manufacturing Practices (GMP)</b>	Is the application of SOPs for handling operations, dosage of ingredients, processing temperatures etc. which are designed to ensure that products are produced in a consistent way according to quality and safety criteria relevant to the product.
<b>Hatchery</b>	Means a place where spawning and larval rearing of aquatic animals takes place generally for commercial purpose.
<b>Hazard</b>	An agent of any type with the potential to cause harm (usually biological, chemical or physical).
<b>Hazard Analysis Critical Control Point (HACCP)</b>	Is a food safety system wherein a systematic approach has been developed for the identification, evaluation and control of food safety hazards.
<b>Illegal treatment</b>	Means the use of unauthorized substances/ products or the use of authorized substances/products above the permissible limit.
<b>Independent cold store</b>	Means a cold store constructed separately to store fishery products meant for export produced by approved establishments, factory vessels or freezer vessels.
<b>Independent ice factory</b>	Means an ice producing facility constructed separately to supply ice to establishments, factory vessels, freezer vessels, fishing vessels, landing sites, collection points and/or auction halls approved by assigned competent authority.
<b>Ingredients</b>	Means a component part or a constituent of any combination or mixture, of a (commercial) feed/food.
<b>Inspection</b>	Is the examination of food or systems for control of food, raw materials, processing, and distribution including in-process and finished product testing, in order to verify that they conform to requirements.
<b>Labelling</b>	Means any words, particulars, trademarks, brand name, or symbol relating to a foodstuff and placed on any packaging, document, notice, label, ring or collar accompanying or referring to such foodstuff.
<b>Label</b>	Refers to a tag, brand, mark, pictorial or other descriptive manner written, printed, stenciled, marked, embossed, or impressed on, or attached to, a container of food or its packaging.
<b>Landing site</b>	Means a place where fish is unloaded from a vessel and transferred to owner or buyer.
<b>Medicated feeding stuffs</b>	Means any mixture of a veterinary medicinal product or products and feed or feeds which is ready prepared for marketing and intended to be fed to animals without further processing, because of its curative or preventive properties or other properties as a medicinal product.

<b>Fisheries Competent Authority (FCA)</b>	Means the government authority within the Ministry of Agriculture, Forestry and Fisheries designated to verify compliance with the requirements of these Technical Requirements.
<b>Official control</b>	Means any form of control that Fisheries Competent Authority for food safety of fishery products performs for the verification of compliance with this regulation.
<b>Organoleptic evaluation</b>	Means the sensory evaluation to assess the quality parameters of fishery products such as their appearance, colour, smell, texture, weight, size etc.
<b>Performance criteria</b>	Means the required performance characteristics (for instance specificity, accuracy, trueness, precision, repeatability, reproducibility, recovery, detection capability or ruggedness) to an analytical method, according to which it can be judged that the analytical method is fit for the purpose and generates reliable results.
<b>Pharmacologically active substances</b>	Means any chemical or substance that affects the physiology, the function of the body of a human or animal. These substances can be artificial or natural, i.e. those created by the body in response to stimulation or injury.
<b>Potable water</b>	Means freshwater fit for human consumption (drinking water) at least compliant with criteria in the Cambodian Drinking Water Quality Standards <a href="https://www.fao.org/faolex/results/details/en/c/LEX-FAOC210669">https://www.fao.org/faolex/results/details/en/c/LEX-FAOC210669</a> updated to the latest edition of the International Standards for Drinking-water issued by the World Health Organization.
<b>Pre-packed fishery product</b>	Means any single item, offered for sale to the final consumer or to mass caterers, consisting of fishery products and the packaging into which the product was put before being offered for sale, presented in such a way that the contents cannot be altered without opening or changing the packaging; whether such packaging encloses the food completely or only partially.
<b>Prerequisite programs</b>	Means procedures including Good Manufacturing Practices (GMPs), Good Hygiene Practices (GHPs) and other procedures that address operational conditions providing the foundation for the HACCP system.
<b>Primary production</b>	Means those steps in the food chain up to and including, for example aquaculture, fishing, landing and harvesting.
<b>Processing</b>	For purpose of this regulation any action, in a land-based facility, including gutting, slicing, peeling, skinning, filleting, heating, smoking, curing, maturing, drying, fermentation, marinating, extraction, extrusion or a combination of those and other processes that substantially alters the anatomical wholeness and/or nature of the product.
<b>Risk analysis</b>	Means a process consisting of three inter connected components: risk assessment, risk management and risk communication.
<b>Risk Assessment</b>	The identification, evaluation and estimation of the levels of risk involved in a process to determine an appropriate control process.
<b>Sanitation (Disinfection)</b>	Means the reduction, by means of chemical agents and/or physical methods of the number of micro-organisms in the environment, to a level that does not compromise food safety or suitability.

<b>Standard Operating Procedure (SOP)</b>	Means procedures that describe as to how any routine operation such as receiving, storing, processing, labelling, shipping etc. are to be conducted and controlled to achieve Good Manufacturing Practices.
<b>Surveillance</b>	Is the careful observation of one or more feed or food business, feed or food business operators or their activities.
<b>Traceability</b>	Refers to the tracing and following of the food movement in a phase of production, processing and distribution.
<b>Validation</b>	Means the element of verification focused on collecting and evaluating scientific and technical information to determine if the HACCP plan, when properly implemented, will effectively control the hazards.
<b>Warehouse, dry</b>	Means a facility that is licensed for export and which may conduct any of the actions of collecting, re-packaging or storage at ambient temperature of dried and salted fishery products.
<b>Warehouse, wet</b>	Means a facility that is licensed for export and which may carry out sorting, icing, packaging of chilled fishery products.
<b>Withdrawal period</b>	Means the period necessary between the last administration of the veterinary medicinal drugs to animals under normal conditions of use and the harvesting, in order to ensure that such foodstuffs do not contain residues in quantities in excess of the maximum permissible limits. The withdrawal period may be different for different veterinary medicines but would always be given in Degree Days (see that definition).
<b>Packaging</b>	Refers to the activities of packaging food in accordance with requirements to ensure the quality and safety of the final food product for consumers.
<b>Certification</b>	Refers to the procedure under which the official certification bodies and the officially recognized entities provide written guarantees or equivalent assurance that any food products or food inspection systems comply with the requirements.
<b>Certificates</b>	Refer to documents attached to food issued by competent institutions such as food safety certificates, livestock certificates, hygiene and phyto-sanitation certificates, diagnostic certificates or other documents in accordance with the food requirement.
<b>Packaging Materials</b>	Refers to materials used for putting or packing food in part or whole, such as baskets, containers, boxes, trays, or other items with or without covers.
<b>Food Handling</b>	Refers to any activity that is directly involved with preparing, storing, and servicing food in food premises.
<b>Food Requirements</b>	Refer to criteria set by ministries and institutions concerned with food quality and safety which must be met.

## References for the Definitions

1. FAO Terms and Definitions <http://www.fao.org/faoterm/en/?defaultCollid=14>
2. ASEAN GAqP; Guidelines on ASEAN Good Aquaculture Practices for Food Fish
3. ASEAN Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems; CAC/GL 26-1997 - Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems
4. CODEX Code of Practice Fish; CAC/RCP 52-2003, Rev. 2 2020
5. ASEAN General Principles of Food Hygiene; (CAC/RCP 1-1969, Rev.4-2003, General Principles of Food Hygiene)
6. EU Regulation (EC) 853/2004, Annex I
7. EU Regulation (EC) 852/2004, Article 2
8. EU Regulation (EC) 1169/2011, Article 2
9. EU Commission Decision 2021/632/EC Article 2 (1)
10. EU Regulation (EC) 2 017/625, Article 3
11. EU Regulation (EC) 178/2002, Article 3
12. EU Commission Decision 2002/657/EC, Annex I
13. Cambodia Quality Seal (CQS) Manual, 2022
14. Cambodia Law on Food Safety, NS/RKM/0622/006, 2022
15. Codex CXC 1-1969 GENERAL PRINCIPLES OF FOOD HYGIENE, Rev. 2020

# GENERAL PROVISIONS



## CHAPTER I: GENERAL PROVISIONS

### 1.1 Introduction

Cambodia's fisheries sector plays a vital role in food security, nutrition, supporting the livelihoods people, and contributing to the development of the national economy. Fisheries sector has been actively contributed in sustaining national economic growth, contributing an average of 7-8% to Cambodia's Gross Domestic Product (GDP). In addition, the sector provides employment to over 6 million people, who are working full-time or part-time in fisheries-related jobs.

Fisheries resources are rich in biodiversity, providing an average catch of approximately 600,000 tons per year, while aquaculture has been playing a significant role with a significant growth rate (20% per year) in supplementing the demand for domestic markets and boosting exports. Fish and fisheries products are the highest source of protein among the total animal proteins consumed by the Cambodian people, and the Cambodian people are one of the highest fish consumers in the world, averaging approximately 52.4 kg/person/year, compared to the current global average of only 20.5 kg/person/year. In addition, fish and fisheries products are in high demand in domestic, regional and international markets, which requires a steady increase in the supply of fish and fishery products to those markets, creating potential opportunities in the post-harvest fisheries sector for business operators, traders and stakeholders.

The Fisheries Administration (FiA) of the Ministry of Agriculture, Forestry and Fisheries (MAFF) is the competent authority responsible for the management, conservation and development of fisheries resources in a sustainable and environmentally friendly manner, with the vision of maintaining food security and nutrition for the population, improving the livelihoods of the people and contributing to the growth of the Cambodian economy. FiA recognizes the important role of the post-harvest fisheries sector as Cambodia adopts a free market economy that is full of competition both regionally and globally. In response, FiA needs to establish food safety official control systems to ensure the safety and quality, to increase market competitiveness and to add value for fish and fishery products, as well as to protect public health and promote fair trade.

Currently, the Fisheries Administration has been implementing food safety official control system with a clear structure and effective management to meet food safety standards in order to facilitate and promote the wider trade of Cambodian fish and fishery products, especially promoting exports to potential markets, including the European Union (EU). The implementation of this system has helped Cambodia to be able to export fish and fishery products to international markets, while FiA has been striving to strengthen and expand the scope of its fishery product exports to major international markets.

As the Fisheries Competent Authority (FCA), the Fisheries Administration has prepared and approved the Technical Requirements for Official Control and Inspection of Quality and Safety of Fish and Fishery Products in Cambodia, with the aim of effectively implementing its official control and inspection activities to protect the health of consumers and promote the export and import of fish and fishery products to international markets. This Technical Requirements is an essential tool for maintaining the responsibilities of the Fisheries Competent Authority and the fisheries sector for the implementation of official control and inspection of the quality and safety of fisheries products.

## 1.2 Scope

These Technical Requirements apply to:

- 1.2.1 All operators in the fishery sector of the Kingdom of Cambodia that produce fishery products intended for export for human consumption including:
  - a. Primary production and associated actors such as hatcheries, aquaculture farms, feed mills and feed importers/distributors, fishing vessels, carrier vessels, ice factories, landing sites, collection points, vehicles for transport of fisheries products.
  - b. Establishments for handling and processing of fishery products.
  - c. Independent cold stores and warehouses storing fishery products intended for export.
- 1.2.2 All operators in the Kingdom of Cambodia that import fishery products intended for distribution and human consumption in Cambodia or for further processing for export.
- 1.2.3 The Fisheries Competent Authorities (FCA) assigned to establish enforcement and compliance programs to verify and document that these Technical Requirements are adhered to by all operators.

The definition of fishery products in these Technical Requirements does not include the production, handling, export or import of live bivalve products.

## 1.3 Objectives

The major objective of these Technical Requirements is to achieve smooth flow of trade of fish and fishery products from and into the Kingdom of Cambodia by;

- 1.3.1 Establishing a food safety control system throughout the food chain in the fishery sector, which is in line with international, regional and national standards and commitments.
- 1.3.2 Achieving the desired quality and safety of fish and fishery products at all stages of production, storage and distribution with an integrated farm-to-fork concept thereby ensuring high level protection of consumer health.
- 1.3.3 Entrusting food business operators with responsibility for food safety by compliance with these Technical Requirements and the FCA with responsibility to verify compliance with the provisions in these Technical Requirements.
- 1.3.4 Establishing Hazard Analysis and Critical Control Points (HACCP) based control system by the food business as a tool to achieve food safety.
- 1.3.5 Enforcing legal and regulatory requirements by the FCA through systematic verification and monitoring activities.
- 1.3.6 Apply a risk-based approach to laying down criteria/control measures for controlling food safety risks.
- 1.3.7 Establishing transparency through public consultation and public information.

## 1.4 Legal Reference

The food safety law NS/RKM/0622/006, 2022 applies to food quality and safety management in Cambodia. It covers all stages of the food production chain and food businesses. Ministries and institutions involved in food quality and safety have the authority to establish food requirements.

In exercise of the powers conferred by inter-ministerial Prakas no UATH.BRK 868, 2010 on Implementation and Institutional Arrangements of Food Safety Based on the Farm to Table approach, the Ministry of Agriculture Forestry and Fisheries (MAFF) is assigned and committed to be sole responsible agency and to lead coordination to promote effective and efficient implementation of the following tasks related to food and food business at primary production and processing:

- Prepare policy and legal framework on food safety at primary production and processing
- Monitor and inspect food and food business at the place of primary production and processing
- Prepare and implement strategic plans for supervision and development to promote compliance to food safety requirements
- Implement verification program and issuing official health and quality certificates for export of food that are fishery products, processed fishery products, animal products and other agricultural products in a raw or primary processed form
- Preparation and implementation of a general plan for crisis management and emergency response to address, minimize or to prevent risks predicted or arising.

The assignment is confirmed in the Cambodian Food Law no. NS/RKM/0622/006 setting out the detailed framework and mechanisms for managing and ensuring safety, quality, hygiene and the legitimacy of food in all stages of the food production chain, with the purpose to provide protection of health and food safety for consumers and to ensure fair food trade.

The MAFF exercises its duties under the Law on Fisheries NS/RKM/506/011/2006 and related legislation establishing, among others, the FiA as the competent authority responsible for issuing licenses or permits to conduct inland and marine fishery, aquaculture, establishing fish landing sites and collection points, commercial transport, international trade, and processing of fish and fishery products<sup>1</sup>. To this end, FiA has been assigned as Fisheries Competent Authorities (FCA) for food safety assigned to the necessary fields and according to their related responsibility and competencies<sup>2</sup>.

<sup>1</sup> Articles 32, 36, 37, 38, 64, 66, 67, 70 – to be revised based on new Fisheries Law.

<sup>2</sup> Sub-Decree No. 17/ANKr. BK dated 07 April 2000 regulates the organization and functioning of MAFF and Sub-decree No. 105/ ANKr. BK dated 22 August 2005 gives MAFF jurisdiction over food safety control of the primary production and primary processing of agricultural products which include fish and fishery products. To this end, the Fishery Administration (FiA) exercises its duties within the area of food safety and quality fisheries products through the Department of Post-harvest Technologies and Quality Control (DFPTQ). Furthermore, under Article 1 of Prakas No. 386 BRK/KSK/B/date, FiA is designated as the government authority responsible for the management of fisheries and fishery resources. Among other tasks, FiA is responsible for law enforcement through inspection, monitoring, control and surveillance of all fishery activities, in its capacity as a judiciary police.

# EXPORT REQUIREMENTS



## CHAPTER II: TECHNICAL REQUIREMENTS FOR EXPORT OF FISH AND FISHERY PRODUCTS

### 2.1 Primary Production and Associated Actors

- 2.1.1 The primary production and associated actors include fishing vessels, aquaculture farms, ice factories, landing sites, collection points, auction places, feed mills and hatcheries. Transporting vehicles under the control of, or used by, the primary producer, feed mills and feed and chemical distributors supplying primary producers are also associated actors to primary production. Suppliers of lime for aquaculture farms are not considered allied area.
- 2.1.2 The primary production and associated actors operating in the food chain meant for export shall
- 2.1.2.1 Operate only on the basis of a registration for operation by the assigned FCA of Fisheries Administration of Ministry of Agriculture, Forestry and Fishery of the Kingdom of Cambodia or other relevant authorities.
  - 2.1.2.2 Be responsible for ensuring the quality and food safety of the products they supply. To this end they shall comply with the hygiene requirements and food safety management principles stipulated in these Technical Requirements and, where relevant, with any additional requirement requested by specific export markets.
  - 2.1.2.3 Give access and offer full cooperation and necessary assistance to the FCA for the purpose of verifying the compliance with conditions stipulated in the chapters 3.1 and 3.2, as per Article 75 of the Cambodian Law on Fisheries of 2006.
- 2.1.3 Business operators in primary production and associated actors, which operate in the food chain intended for export shall be listed to each specific market by FCA, subject to compliance with specific technical requirements for the markets they are listed for.
- 2.1.4 Such listing may exclude areas with no direct impact on food safety, e.g. lime suppliers for aquaculture farms. The procedure for Listing and maintaining of such Listing shall be documented and implemented by the FCA, and informed to the business operator.

### 2.2 Processing Establishments and Associated Actors

Processing and associated activities are operations other than primary production and associated actors, which may include processing facilities, handling and storage in dry or wet warehouses, storage in cold store as well as salt production sites/salt distribution (imported salt). Transporting vehicles under the control of or used for transport of processed products are also to be considered associated actors to production.

- 2.2.1 The processing establishments and associated actors operating in the food chain meant for export shall:
- 2.2.1.1 Operate only on the basis of a valid registration and specific Approval for purpose of export by the FCA of Fisheries Administration of the Ministry of Agriculture, Forestry and Fisheries of the Kingdom of Cambodia.
  - 2.2.1.2 Ensure and be responsible that the food or feed products produced in and distributed from the establishment are safe for the intended consumers, specifically the compliance with all requirements stipulated in the chapters 3.3-3.11 of this document and additional requirements of the markets which products are intended for.

- 2.2.1.3 Ensure traceability from the source to the final product.
- 2.2.1.4 Give access to and cooperate with the FCA for inspection, audit, sampling and any other investigations deemed necessary to verify compliance with requirements stipulated in chapter 3.3-3.11 of this document and, where relevant, the also to verify compliance with requirements of the markets which the food business is Approved for.
- 2.2.2 For export to certain markets, the Approval may be conditional to compliance with specific requirements on that market as stipulated in chapter 4.2 of this document.
  - 2.2.2.1 Approval, conditional to compliance with specific market criteria, e.g. EU, Vietnam, Korea, Australia or China shall be established and announced by the FCA when such is required by the competent authority of that market.
  - 2.2.2.2 The FCA shall establish procedures for receiving and handling of applications for Approval according to the chapters 4.1-4.2 and keep the food business operators informed about such procedures and related requirements.
- 2.2.3 The FCA shall establish procedures for renewal of the Approval for export and keep the food business operators informed about such procedures and related requirements.
- 2.2.4 The FCA may withdraw or suspend temporarily the permission to export to specific markets if the food business fails to comply with the required food hygiene and food safety requirements. The FCA shall establish procedures and keep the food business operators informed about such procedures and related requirements.
- 2.2.5 The FCA shall comply with requirements stipulated in chapter 4 of these Technical Requirements when conducting verification activities.

# HYGIENE REQUIREMENTS



## CHAPTER III: HYGIENE REQUIREMENTS

### 3.1 General Requirements – Primary Production and Associated Actors

- 3.1.1 Food Business operators shall maintain high level of hygiene at all stages of production, harvest, handling, storage and transport by minimizing the risk for contaminations from any sources and ensure the safety and quality of raw fishery products/feed.
- 3.1.2 Food Business operators shall ensure that the cold chain is maintained post-harvest as necessary for control of food safety and or quality of the products.
- 3.1.3 Food Business operators in the aquaculture sector shall ensure that chemicals and veterinary medical products are used only in compliance with provisions of DG Decision on use of veterinary medicines in Aquaculture<sup>3</sup>.
- 3.1.4 Food Business operators of the primary production area shall ensure that the staff do not carry diseases that may be transferred to other humans with the food.
- 3.1.5 Food Business operators shall conduct regular training to their employees for maintaining personal hygiene and hygiene and food safety conditions in the facilities.
- 3.1.6 Food Business operators of primary production and associated actors shall maintain and document traceability of all input and output related with their production of food. For this purpose, records of production, harvest/landing, sale, cleaning and sanitation, pond management, use of chemicals, veterinary medicines and feed and treatment of diseases, shall be maintained and made available to the FCA at any time and request.

### 3.2 Specific Requirements – Primary Production and Associated Actors

#### 3.2.1 Hatcheries

- 3.2.1.1 Hatcheries shall have a valid registration by the FCA of the Fisheries Administration of the Ministry of Agriculture, Forestry and Fisheries of the Kingdom of Cambodia or related regional authority<sup>4</sup>.
- 3.2.1.2 Hatcheries shall apply Good Aquaculture Practices in reference to the Cambodian “Guidelines on ASEAN Good Aquaculture Practices (ASEAN GAqP) for Food Fish”.
- 3.2.1.3 Hatchery operators shall have documented procedures for cleaning and sanitation, use of antimicrobial products or VMPs and maintain records for all operations and keep traceability to all inputs and outputs, including the movements of aquaculture animals.

#### 3.2.2 Aquaculture Farms

- 3.2.2.1 Aquaculture farms shall have a valid registration and permission by FCA of the Fisheries Administration of the Ministry of Agriculture, Forestry and Fisheries of the Kingdom of Cambodia or related regional authority<sup>5</sup>.
- 3.2.2.2 While selecting the site for aquaculture farming it shall be ensured that construction of the farm shall not disturb the ecosystem and natural habitats of that locality and undesirable pollutants/chemicals from nearby areas do not contaminate the farm.

<sup>3</sup> DG-Decision No. 954 FIA dated 22 March 2024 on Technical Order for the Use of Aquatic Medicinal Products in the Kingdom of Cambodia.

<sup>4</sup> Cambodia Food Safety Law, 2022 article 9 and the Aquaculture Order 2012, requirement 1.

<sup>5</sup> To be included in new Fisheries Law and proclamation No. 0002 PROR KOR KOR SOR SOR on Competent Authorities in Issuing Permission to Do Fishery in Open Water, Aquaculture Fish Processing and Special Permissions, 1989.

- Prevent the entry of unwanted species into the ponds by screening inlet and outlet of water. The percolation rate/porosity of soil of the pond shall be low enough to hold the pond water satisfactorily. The ponds should be free from harmful chemical and natural pollutants. Quality and chemical composition of water shall be species specific.
- 3.2.2.3 Good Aquaculture Practices (GAqP) shall be adopted at all stages of production to ensure the quality and safety of the aquaculture animals. Farms shall adopt at least the applicable Cambodian requirements in this respect and international code of practices like World Organization for Animal Health (WOAH)'s 'Aquatic Animal Health Code' and/or the ASEAN "Guidelines on ASEAN Good Aquaculture Practices (ASEAN GAqP) for Food Fish" shall apply where it is necessary for compliance with specific export market requirements. The FCA shall inform food business operators about such requirements.
- 3.2.2.4 The farm shall receive inputs including feed, feed supplements, veterinary medical products and other chemicals, only from suppliers with a valid registration by General Directorate of Animal Health and Production of MAFF to distribute such products<sup>6</sup>. The composition of all inputs must be known, preferably through technical data sheets from the supplier. The farm shall maintain proper stock/utilization register of all inputs and outputs, including register on drug use.
- 3.2.2.5 Only inputs allowed to be used in aquaculture shall be stored. All inputs shall be stored and used according to the instructions given by the supplier, either in the label or in related technical data sheets. The storage area shall be clean and neat and maintained properly to avoid contamination. Responsible person for receiving, storage and utilisation of inputs shall be identified.
- 3.2.2.6 Larvae, fingerlings etc. shall be procured only from hatcheries registered by Fisheries Administration, after ensuring that they are free from diseases, harmful chemicals and pharmacologically active substances. Proper traceability shall be maintained for all movements of aquaculture animals in and out of the farm.
- 3.2.2.7 Proper water management system shall be introduced to ensure the quality of water. Suitable water filtration system shall be established to minimize risk for organic impurities and pathogenic bacteria.
- 3.2.2.8 Waste shall be disposed in a suitable manner to avoid cross contamination. Chemical wastes and non-biodegradable wastes shall be disposed of as per supplier instructions and legal requirement of the Prakas No. 387 Br.K.B.Sth of Ministry of Environment on the Launch of Standards of the Quality of Toxins or Hazardous Substances Allowed to be Disposed.
- 3.2.2.9 Adequate cleaning & sanitation shall be done at all areas of the farm, including machineries and equipment's to minimize the risk for contamination. Employee shall strictly adhere to personnel hygiene practices as applicable for the type of work.
- 3.2.2.10 Chemicals and veterinary medical products may be stored and used in the farm only if they are authorized for aquaculture by FIA<sup>7</sup>.
- 3.2.2.11 Withdrawal times for authorized pharmacological active substances shall be at least 500-degree days if not otherwise stipulated for specific products. The input and output records shall be maintained so to document adequate withdrawal times.

<sup>6</sup> MAFF Prakas No. 384 ProrKor.KorSorkor, 2020 on the Procedures for Managing Veterinary Medicines and Biological Materials in Trade and Mixing, and MAFF Prakas No. 414 ProrKor.KorSorkor, 2019 on Procedure to Issue Permit and Technical Standards for Importation, Exportation, Transit, Manufacturing, Mixing, Repackaging, Stockpiling, Supplying-Distribution, Wholesale-Retail and Transportation of Veterinary Medicines.

<sup>7</sup> DG-Decision No. 954 FIA dated 22 March 2024 on Technical Order for the Use of Aquatic Medicinal Products in the Kingdom of Cambodia.

- 3.2.2.12 Monitoring shall be done to ascertain the health status of aquatic animals, their movements within the farm, mortality rates and the presence of exotic and non-exotic diseases and records maintained. Information regarding the emerging diseases and actions taken to prevent their potential spreading shall be immediately communicated to FiA/DAD.
- 3.2.2.13 Only aquaculture animals which have reached commercial size and which show no clinical sign of disease may be harvested for distribution as food for human consumption.
- 3.2.2.14 Harvesting shall take place to minimise the risk for contamination of the fish with soil, dust and other environmental contaminants and so the fish is not subject to unduly high temperatures. Immediately after harvest the fish shall be placed in designated clean facilities, protected from contamination and mixed with ice made from clean or potable water or a mix of ice and clean water sufficient to cool the fish to temperature below 4°C.
- 3.2.2.15 Where fish is beheaded and /or gutted before transport, such operations must be carried out hygienically under conditions stipulated in the sections 3.2.6.1-3.2.6.6 and the products must be washed immediately and thoroughly with potable water or clean water.
- 3.2.2.16 Fish intended to be transported alive after harvest shall be kept under conditions that do not affect their viability.
- 3.2.2.17 The farm shall have a documented procedure for the application of Good Aquaculture Practices. The farm shall maintain records as necessary to document traceability of animals including records of all inputs used for the rearing and all outputs from the rearing. Maintaining of GAqP shall be documented through records on pond management, water management, stocking, feed management, chemicals and veterinary medical products managing, mortality, disease investigations, cleaning of equipment, harvesting and transport of fish.

### 3.2.3 Feed Mills and Feed Distribution

- 3.2.3.1 Feed Mills and importers and exporters of feed shall ensure that all animal feeds, feed ingredients and feed additives have a valid registration by General Directorate of Animal Health and Production of MAFF and as per requirements in Prakas No. 051 PRK.MAFF<sup>8</sup>.
- 3.2.3.2 Feed mills shall ensure that their products do not contain ingredient, additives or contaminants which may be a source of un-acceptable contamination of the farmed aquatic animals. Therefore, feed mills shall implement Good Manufacturing Practices (GMP), a HACCP based control systems and specifically comply with the following basic requirements.
- 3.2.3.3 Feed mill facilities shall be kept clean and shall have defined curtilage. The factory shall be housed in a building of permanent nature affording sufficient protection from the environment and shall be of sufficient size for the work to be carried out under hygienic conditions.
- 3.2.3.4 The design and layout shall be such as to preclude contamination. The layout of different sections shall be such as to facilitate smooth and orderly flow of work and to prevent possible cross contamination and backtracking.

<sup>8</sup> Prakas No. 051 PRK.MAFF to be updated or supplemented with requirements related to aquatic animals.

- 3.2.3.5 Change room(s) with adequate facilities shall be provided for workers and suitable facilities for washing hands shall be provided for workers at entry points.
- 3.2.3.6 Utensils, machineries, conveyors, mills, aspirators, screeners, mixers and other feed contact surfaces shall be smooth, clean and maintained in good hygienic condition to avoid contamination of the feed. Sieves, screens, filters, separators and mixers shall be regularly checked for damages, cleanliness and their effective operation.
- 3.2.3.7 Separate storage facilities shall be provided for storing incoming materials, finished products and also packing materials hygienically. Storage areas shall be hygienically maintained and shall be free from moisture, dust, vermin and birds. Medicated feeding stuff, premix and feed additives shall be stored in suitable, separate and secured rooms or hermetic containers with proper labelling and traceability records on a first in - first out basis. Only authorised person shall have access to these stores. Proper records of storage, with details of incoming and outgoing materials shall be maintained by a responsible person.
- 3.2.3.8 Waste shall be collected promptly and, or stored in dedicated waste containers away from incoming raw material and finished product storage areas and shall be disposed of legally in accordance with the Prakas No. 387 Br.K.B.Sth.
- 3.2.3.9 Suitable pest control measures shall be taken to prevent the entry of flies, rodents, lizards etc. into the premises as specified at chapter 3.7.4.
- 3.2.3.10 A HACCP based Feed Safety Management System shall be implemented. Critical Control Points shall be monitored on a laid down frequency and in case of deviation, corrective action shall be taken promptly. Traceability of incoming materials and finished products shall be established from the source. Recall procedures shall be developed to address customer complaints. Control of carry over shall be addressed within the HACCP study.
- 3.2.3.11 Specifications on quality and food/feed safety parameters for incoming ingredients, feed additives, pre-mixtures, and finished products shall be developed and effective quality control to document compliance shall be established.
- 3.2.3.12 Chemicals and pharmacological active substances banned for use in aquaculture products by the FCA of Fisheries Administration of the Ministry of Agriculture, Forestry and Fishery shall not be accepted in any ingredient, pre-mixture or additive.
- 3.2.3.13 Chemicals and pharmacological active substances allowed for use in aquaculture products by the FCA of Fisheries Administration shall be clearly labelled on the product and on related technical Data Sheet, whether added directly or carried over from other ingredients or pre-mixtures.
- 3.2.3.14 Feed shall comply with criteria stipulated by FCA, as regard the content of contaminants and additives at the time of distribution.
- 3.2.3.15 A well-documented, effective cleaning and sanitation programme shall be developed and implemented as per the laid down frequency.
- 3.2.3.16 A written procedure shall be developed to ensure regular cleaning of cooler. If air is used for conveying or cooling, it should be checked for microbial contamination. Pelleting conditions must be assessed to ensure stability of the feed additives.
- 3.2.3.17 Employees shall adopt adequate hygiene practices and wear clean protective clothes. The requirements specified at chapter 3.7.2, may be implemented, as applicable.
- 3.2.3.18 Internal audits shall be performed at least once in a year to establish that the HACCP is in place and all the control systems are effective to produce safe feed products.

- 3.2.3.19 Well documented internal standards, specifications, operating procedures etc. shall be developed as a part of the HACCP based Feed Safety Management System. Records pertaining to documentation of monitoring of critical control points, hygiene and sanitation, personal hygiene, pest control, calibration, traceability, training, incoming and outgoing material, stock register, carry over etc. shall be maintained in a way that allows for traceability.
- 3.2.3.20 The labelling of compound feed intended for aquaculture animals shall include at least:
- Commercial Name and unique product code (if it exist)
  - Type of feed ("complete" or "complementary") and target aquatic animal (for example indicated as "complete feed for freshwater fish")
  - Registration number or other unique ID number and name and address of the feed business operator under which name the feed is placed on the market.
  - Batch or lot reference number
  - Net quantity per package unit
  - General instructions for proper use
  - The minimum storage life indicated as "use before date" or "best before date"
  - Composition by feed ingredients (materials) in descending order
  - Feed additives expressed in amount per kg or amount per liter
  - If any pharmacological active substance is included in the compound feed, the functional substance(s) and the content of the substance shall be clearly indicated on the label.
- 3.2.3.21 Imported feed shall be labelled as indicated in section 3.2.3.20 and additionally be provided with:
- Information about the Importer name and address and, when necessary, a translation of the information on the label to Khmer or English language.
  - Information about its approval/listing by the competent authority of the country in which the feed is produced. This information may be provided in separate document if not directly on the label.
- 3.2.3.22 On farm feed production shall adhere to provisions in Annex of Aquaculture Order, 2012<sup>9</sup>.
- 3.2.3.23 Production, sale and use of feed with medicines is permitted in aquaculture in Cambodia only with certificate declaring absence of prohibited substances and registration for sale by FCA<sup>10</sup>.

### 3.2.4 Fishing Vessels

Fishing vessels supplying raw materials intended for export shall comply with all the requirements to fishing vessels stipulated in the Cambodian CQS Manual section 2, part C. In addition, such vessels shall comply with the following specific requirements:

- When vessels have intake of clean water, it must be situated in a position that avoids contamination of the water supply.
- In vessels equipped for chilling fishery products by cooled clean seawater, tanks must be fitted with devices for temperature monitoring in the tanks. The system shall ensure that the mix of fish and clean seawater reaches not more than 3°C six hours after loading and not more than 0°C after 16 hours.

<sup>9</sup> To be reviewed and issued with new DG Decision.

<sup>10</sup> DG-Decision No. 954 FIA dated 22 March 2024 on Technical Order for the Use of Aquatic Medicinal Products in the Kingdom of Cambodia.

- c) Vessels shall be equipped with facilities that allow crew to wash hands, when necessary, prior to handling the catch.
- d) Utmost care shall be taken while catching/ storing/handling of fish to avoid injury or physical damage. Fish should be handled hygienically to avoid contamination at all stages.
- e) The fishery products should be loaded onto the vessel on a clean surface where risk for contamination with oil, grease and other dirt is minimized. After taken on board, fishery products shall undergo chilling as soon as possible. Ice used for chilling shall be clean and made up of potable water or clean water and kept under clean conditions. Fishery products shall at all times be protected from contamination and from the effect of sun and other sources of heat, when on board the vessel.
- f) Where fish is beheaded and /or gutted on board, such operations must be carried out hygienically and the products must be washed immediately and thoroughly with potable water or clean seawater.
- g) Staff assigned for handling of fishery products shall be trained in good handling practices as relevant for the type of vessel and species and they shall be required to maintain a high standard of personal cleanliness. Persons liable to contaminate fishery products due to illness or poor personal hygiene shall not be permitted to handle the products.
- h) When in use, the parts of vessels or containers set aside for the storage of fishery products must be kept clean and maintained in good repair and condition.
- i) The vessel shall keep records of catches and landings/transfers which allow traceability to the date(s), amount and type of fish caught and transferred/ landed.
- j) The vessel shall demonstrate the effective implementation of GHP for pest control, waste disposal, cleaning and sanitation, personal hygiene and GMP for use of sulphites where relevant.
- k) Carrier vessels shall comply with provisions in points 3.2.4.1a – 3.2.4.1j.
- l) Carrier vessels shall not do any other activities than transport, ensuring chilling by ice or refrigeration.

### 3.2.5 Dai Fishery

When fish are harvested using seines, nets or other means of manual fishing shall apply the following:

- a. The operator shall have a license to exploitation of the inland or marine fishing as required in the Cambodian Fisheries Law articles 39 and 45.
- b. Seines, nets and traps should be carefully selected to ensure minimum damage during harvesting.
- c. Harvesting areas and all equipment for harvesting, catching, sorting, grading, conveying and transporting of products from dai fishery should be designed for their rapid and efficient handling without causing mechanical damage to the products. They should be easy to clean and free from contamination and should not transmit toxic substances and should not cause mechanical injuries to them.

- d. Transport of products from dai fishery shall take place either as either:
  1. Live fish, under conditions that do not alter their viability (water temperature and oxygen)
  2. Fish intended specifically for fermentation may be transported at ambient temperature if reaching the fermentation tank within four hours from the point of capture.
  3. At temperature approaching that of melted ice and comply with requirements of section 3.7.9.1., 3.7.9.2 and 3.7.9.4.

### 3.2.6 Landing Sites and Collection Points

- 3.2.6.1 Landing sites and collection Points handling raw materials intended for export shall comply with the requirements stipulated in the Cambodian CQS Manual section 2, part B. In addition, such facilities shall comply with the specific requirements in section 3.2.6.2-3.2.6.6.
- 3.2.6.2 Adequate quantity of potable water or clean sea water shall be available for cleaning and sanitation.
- 3.2.6.3 Shall have access to sufficient quantity of ice made of potable water or clean sea water and provisions for hygienic handling and storing of the ice.
- 3.2.6.4 Shall take suitable measures to ensure the risk related with pests inside the area of operation, including elimination of shelters and attractants of pest in the surroundings. Records of pest control activities shall be maintained for verification
- 3.2.6.5 Workers shall adopt personal hygiene practices to avoid contamination of fishery products. There shall be sanitary facilities at appropriate places for hand washing with sufficient number of washbasins, soap, disinfectants and single use hand towels. Appropriate number of flush lavatories shall also be provided outside the collection points.

## 3.3 General Requirements – Processing and Associated Actors

- 3.3.1 Food business operators shall comply with requirements to documentation and recordkeeping that allow for traceability at any time when the product may be available on the market, as provided for in the CQS Manual Ch. 3.1, 3.2, 3.3, and 3.6.
- 3.3.2 Food business operators shall adhere to requirements for withdrawal or recall in the CQS Manual ch 3.8 if he/she considers or has reason to believe that a product placed on the market under his/her responsibility is not in compliance with the requirements in this document. Food Business operator shall immediately inform the FCA and initiate measures to withdraw the affected product(s) from the market. The food business operator shall allow the FCA full access to facilities, staff and documents and cooperate in all actions to minimize any risk from the food.
- 3.3.3 Food business operators shall obtain Health Certificates from FCA, as per the requirement of an importing country, or the FCA before the departure of each consignment for export. The FCA shall establish procedures and keep the food business operators informed about such procedures and related requirements.

## 3.4 Requirements to Infrastructure – Processing and Associated Actors

### 3.4.1 Processing Facilities

The processing facilities shall comply with requirements to CQS section 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.11, 4.13, and where relevant also the Annex 1 of the CQS Manual. Specifically observe the further detailed requirements in section 3.4.1.1-3.4.1.21.

- 3.4.1.1 The surroundings of the factory shall be free from objectionable odours, smoke, dust and other contaminants. It shall be maintained clean without stagnant water or garbage accumulation. The establishment shall be housed in a building of permanent nature affording sufficient protection from the environment and shall be of sufficient size for the work to be carried out under hygienic conditions. The design and layout shall be such as to preclude contamination. Immediate surroundings of the building shall be with hard surfaces to avoid pest and windblown dust.
- 3.4.1.2 The layout of different sections shall be such as to facilitate smooth and orderly flow of work and to prevent possible cross contamination and backtracking. All the fish handling areas shall be separate from areas used for residential purpose. There shall be adequate lighting and ventilation and light fixtures shall be protected with proper covering. The layout shall ensure sufficient space in different sections for machinery, equipment, personnel etc. without congestion. The building shall provide sufficient protection against the entry and harbourage of rodent, insects, birds etc. Non-operative areas inside the establishment, if any, shall be properly cordoned off to avoid possible cross- contamination
- 3.4.1.3 The floor of fish handling areas shall be smooth, impermeable and easy to clean and disinfect. There shall be no water stagnation on the floor. The floor shall have sufficient slope opposite to the flow of work or sideways. The wall to floor and wall-to-wall junctions shall be rounded off to facilitate easy cleaning.
- 3.4.1.4 There shall be adequate drainage facility and slope of the drainage shall be opposite to the flow of work/ material. The drains shall be of adequate size having sufficient slope for easy cleaning.
- 3.4.1.5 The doors shall be tight fitting to prevent the entry of flies. All doors and windows shall be durable and made of corrosion resistant material and windowsills, if any, shall be sloped inwards. The windows/ ventilators opening to the outside shall be constructed with fly proofing nets to prevent the entry of flies. Mechanical ventilation/ exhaust fans shall be provided in areas of air stagnation.
- 3.4.1.6 All the entry points shall have suitable arrangements to prevent the entry of flies/ dust. Suitable washing and sanitizing facilities for hands shall be provided at the entry points. Hand washing facilities such as non-hand operated wash basin, liquid soap, nail brush, disinfectants, hand drying facilities shall be provided. Foot baths shall be provided and maintained with disinfection solution to ensure disinfection of boots at entrance to processing areas, where it is deemed necessary for maintaining of food safety.
- 3.4.1.7 All utensils and equipment in contact with food shall be made of non-corrodible food grade materials. Surfaces in contact with food shall be smooth without cracks and crevices and easy to clean and disinfect. Separate colour codes shall be given for utensils/crates/tubs using in the high-risk areas to avoid cross contamination.

- 3.4.1.8 Adequate number of change rooms for workers of suitable size having smooth, washable walls and floors shall be provided depending upon the quantum of production and number of workers at duty at the same time. Change room shall have hygienic facilities for changing to the protective clothes and hygienic toilet facilities.
- 3.4.1.9 Employees shall wear protective clothes only inside the processing establishment. Laundry facilities which ensure that protective clothes are effectively cleaned, dried and kept under conditions so minimize risk for contamination shall be available. Employees shall not be allowed to bring protective clothes outside the processing facility.
- 3.4.1.10 Chill rooms with mechanical refrigeration system to maintain temperature at level (0°C to 4°C) or adequate number of insulated boxes with ice shall be provided for storing fishery products as deemed necessary to keep the raw materials and intermediate products at temperature approaching that of melting ice.
- 3.4.1.11 Freezers shall have sufficient capacity to bring the core temperature of the products to -18°C as quickly as possible and at least within 5-6 hours.
- 3.4.1.12 Establishments processing frozen fishery products shall ensure that the products are placed and kept in cold storage having suitable capacity to maintain the product temperature below -18°C. External cold stores may be used only if Listed or Approved by the FCA and if the food business operator achieve documentation that the temperature of products is maintained at -18°C or below.
- 3.4.1.13 Solid wastes shall be collected in identifiable containers/bags designated for the purpose and shall be stored so it is not a source of contamination to the products or the environment. Solid waste shall be disposed of as soon as possible.
- 3.4.1.14 A stable and sufficient supply of water compliant with the requirements referred to in chapter 3.7.3 of this document shall be ensured at all places necessary for the operations. For this purpose, the water supply system may include suitable water purification and disinfection system. The water supply system shall be designed so to minimise the risk for backflow in the pipe system and the taps shall be fitted with non-return valves to avoid back flow of water. Water storage tanks shall be protected from dust, pest by covering with lockable lids and the tanks shall be cleaned on a laid down frequency.
- 3.4.1.15 Plumbing diagrams showing the entire reticulation of the water, identifying each tap with consecutive numbers shall be established and maintained.
- 3.4.1.16 Water not intended for contact with food and food contact surfaces (e.g. for cooling, steam productions etc.) shall be distributed in separate well identified plumbing systems.
- 3.4.1.17 If the ice factory is not integrated to main establishment, it shall be Listed by the FCA separately.
- 3.4.1.18 There shall be separate stores for wet and dry items and the chemicals/disinfectants should be properly labelled. Packing material store shall be of adequate size with proper fly and dust proofing system. Cartons shall be kept on cleanable pallets away from the walls and covered properly.
- 3.4.1.19 The establishment may have a well-equipped in-house laboratory for testing microbiological and other chemical parameters or can test their products in external private or government laboratories.

### 3.4.2 Independent Ice Production and Storage Facilities

- 3.4.2.1 Ice shall at all times be produced from potable water and be handled as food and as such be protected from contamination from air, dust, soil and any other poor hygiene practice.
- 3.4.2.2 The infrastructure and hygiene requirements specified in section 3.4.1 applies to ice production and storage where applicable; the requirements in sections 3.4.1.1, 3.4.1.3, 3.4.1.4, 3.4.1.5, 3.4.1.6 and 3.4.1.7, shall always apply to ice producers.
- 3.4.2.3 The ice factory shall establish and implement a food safety management system including at least all procedures and records pertaining to cleaning and sanitation of all facilities, personal hygiene, staff training, control of water, and amounts supplied to different operators.

### 3.4.3 Independent Cold Storage Facilities

- 3.4.3.1 The surroundings shall be reasonably free from objectionable odors, smoke, dust and other contaminants. The refrigerated storages shall be housed in a building of permanent nature affording sufficient protection from the environment and shall be of sufficient size for the work to be carried out under hygienic conditions. The design and layout shall be such as to preclude contamination.
- 3.4.3.2 Good Hygiene practices shall be applied.
- 3.4.3.3 In cold storages, ante-room with suitable size having smooth walls, floor and roof shall be provided, the door of which shall be made of non-absorbent material and fitted with air curtain/strip curtains. There shall be suitable mechanism to prevent condensation of water inside ante room. Suitable provisions for loading and unloading the cargo hygienically without causing temperature fluctuation shall be provided.
- 3.4.3.4 Cold storages shall have refrigeration system with sufficient capacity to maintain the temperature around product at  $-18^{\circ}\text{C}$  or below and equipment and practices for storage of the products shall allow for efficient circulation of the cold air around products in the whole room.
- 3.4.3.5 It shall be ensured that during defrosting, variation in temperature is minimal and the period is short so as to avoid temperature abuse of the products.
- 3.4.3.6 The cold store shall have an automatic temperature recording device with a temperature sensor which shall be located at the warmest place in the cold storage. Cold stores Approved for EU market, shall have an automatic recording device (data logger), which comply with EN 12830 standard to monitor the air temperature in cold store. Thermometers and recording devices used for monitoring in the cold store shall be shall verified periodically according to EN 13486.
- 3.4.3.7 Chill rooms for storing chilled fishery products shall have a refrigeration system sufficient to maintain the product temperature at  $4^{\circ}\text{C}$  or below.
- 3.4.3.8 Cold Stores shall have a documented Food Safety Management System adequate to their operations. The system shall include at least procedures and record keeping pertaining to Good Manufacturing Practices, cleaning and sanitation, details of loading, unloading and storage of products (for traceability purposes), store temperatures, and calibration of temperature measuring devices and records of actions taken in cases of non-compliance with temperature requirements.

- 3.4.3.9 Cold storages shall ensure that products received for storage are at least -18°C when entering the cold store.
- 3.4.3.10 Temperature recording shall be dated and stored for a period of at least two years, or for a longer period taking into account the nature and the shelf life of the quick-frozen foodstuffs.

### 3.5 HACCP Based Control Systems – Processing and Associated Actors

- 3.5.1 Food business shall control food safety hazards that are reasonably likely to occur in the operation through developing and implementing a HACCP based own check system following at least the ASEAN General Principles of Food Hygiene including the sections 2a – 2.j below.
- 3.5.2 Pre-requisite programs shall be documented and implemented at least for
  - a. Good Manufacturing Practices
  - b. Control of Raw material supplies
  - c. Control of Water and Ice
  - d. Control of contamination from food contact surfaces
  - e. Prevention of cross contamination
  - f. Personal Hygiene
  - g. Employee health
  - h. Control of contamination of pests
  - i. Control of toxic compounds (chemicals)
  - j. Control of packaging materials
- 3.5.3 The Prerequisite Programs shall be documented as adequate for the operation and monitoring and verification shall be defined and implemented, as necessary to ensure the continued control of hygiene conditions.
- 3.5.4 The seven principles of HACCP shall be applied, documented and implemented as adequate for the operation. The principles are:
  - PRINCIPLE 1: Conduct a hazard analysis.
  - PRINCIPLE 2: Determine the Critical Control Points (CCPs).
  - PRINCIPLE 3: Establish critical limit(s).
  - PRINCIPLE 4: Establish a system to monitor control of the CCP.
  - PRINCIPLE 5: Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control.
  - PRINCIPLE 6: Establish procedures for verification to confirm that the HACCP system is working effectively.
  - PRINCIPLE 7: Establish documentation concerning all procedures and records appropriate to these principles and their application.
- 3.5.5 Food business operator shall ensure that the HACCP system is developed, implemented and maintained under personal with adequate knowledge to identify the hazards and related control measures as they may be applied in the whole organization. The personal shall be understood as the HACCP Team Leader and the HACCP Team.
- 3.5.6 Food business operator shall maintain all the HACCP records including CCP monitoring, corrective action records, verification records, production records, testing records, cleaning and sanitation records, validation records, calibration records, temperature records, review and audit reports etc. for a period as least as long as products may on the market. The records shall be available for verification by FCA at any time.

- 3.5.7 Food business operators shall organize record keeping so they for all products produced allow for traceability to supplier(s) of input and to buyer of the product.
- 3.5.8 The food business operators shall review the HACCP system to verify that it is adequate to control food safety hazards that are reasonably likely to occur at least once in a year and in case of any change in the product/process/ source of raw material or in case of food safety relate complaints from customers. The records of reviews shall be maintained for verification.
- 3.5.9 Food business Operator shall ensure that internal audits covering all areas of Good Hygiene Practices (GHPs), Good Manufacturing Practices (GMPs) and HACCP are conducted at least once in a year.
- 3.5.10 The food business operator shall ensure that the FCA has an updated version of the HACCP system documentation. Any deviation in the products produced and process flow changes that influence on the identification of the CCPs shall be brought to the notice of the competent authority immediately.

## 3.6 Product Control – Processing and Associated Actors

### 3.6.1 Raw Material Control

- 3.6.1.1 Food business operator shall take utmost care to ensure the traceability, quality and safety of all raw materials used for processing. For this purpose, the business shall comply with the requirements to Internal Control System (ICS) as specified in section 8 of the CQS Manual, and where relevant also the Annex 1 of the CQS Manual. Further the specific requirements stipulated in section 3.6.1.2-3.6.1.5 below shall be applied.
- 3.6.1.2 A specification for the raw materials shall be agreed with or communicated to the supplier, including at least:
  - a. For fish raw materials, the raw material specification shall include quality criteria typical for the species, temperature criteria at receiving and agreements on hygiene criteria for harvest/landing and transport where such activities are not under the control of the food business operator.
  - b. For raw materials from aquaculture, the raw materials specification shall also include provisions for accepting raw materials only from farms that:
    - i. Commit to comply with the regulation on use of veterinary medicines and other chemicals, as per requirements in section 3.6.3.
    - ii. Commit to have implemented GAqP in production
    - iii. Commit to supply only fish that have no visual signs of diseases.
  - c. The specification for other inputs shall be provided by the supplier and include information about ingredients, information about content of any food additives by name and number according to international harmonised system (E-number or INS-number), and information about storage conditions and use, where adequate.
- 3.6.1.3 Traceability to raw material shall be maintained by both of the food business operators.
- 3.6.1.4 Food business operator shall ensure that fish raw materials are washed with clean water, and that chilling to at least +4°C is initiated immediately after catch or harvest of the raw material. Transportation of fish raw materials shall be done in clean vehicles in clean and properly covered containers.

- 3.6.1.5 Receiving control shall be conducted before accepting the raw material for further processing. The receiving control shall at least include organoleptic evaluation against the specification by a qualified/ experienced employee of the factory. The organoleptic evaluation shall include also assessment of visual signs for diseases. Sampling for verification or monitoring under the HACCP system may be done on a laid down frequency specified in the HACCP Plan. The sample size shall be documented.

### 3.6.2 Final Product Control – Processing and Associated Actors

Under the HACCP system, the food business shall document sampling and testing of final products and raw materials to document compliance with specific food safety requirements of the importing countries. The FCA shall ensure that updated information about requirements of major import markets is available to the business. Annex 3 and 4 of these Technical Requirements provide guidance on sampling and testing where no specific market requirements apply.

1. **Organoleptic evaluation** shall ascertain the freshness of the product before export. If organoleptic evaluation of raw material/finished products reveals any doubt as to the freshness of fishery products, the sample shall be tested for total volatile basic nitrogen (TVB-N) or trimethylamine nitrogen (TMA-N), (see Annex 5).
2. **Parasite check:** Food business operators shall ensure that fishery products have been subjected to visual examination and of removal of visible parasites before or during processing, where relevant (See Annex 5).
  - i. Processors should make every effort to achieve parasite check through a non-destructive examination of fish and fishery products during processing by qualified personnel, where applicable. The checking shall be performed under good light conditions, when adequate, by using candling.
  - ii. When processing conditions do not allow for the examination of each individual fish, the processor must develop a sampling plan for each batch of processed fish. The sampling plan for mechanically eviscerated fish must include a representative number of samples of not less than 10 fish per batch.
3. **Histamine:** Food business operators shall ensure that the HACCP system monitoring and verification document compliance with requirements in Cambodia National Standards for fish sauce and Prahok (fermented fish) as well as the relevant Codex standards and/or standards on export markets to which the products are intended.
4. **Microbiological criteria:** As a part of verification procedure, fishery products meant for export shall be tested on a laid down frequency to document that microbiological hazards are controlled and, that the product comply with specific market or customer criteria.
5. **Contaminants, residues and other chemicals:** As a part of HACCP verification the procedure, fishery products meant for export shall be tested on a laid down frequency to document that environmental contaminants, residues of veterinary medicines, and additives are under controlled as foreseen in the HACCP Plan, and that the product comply with specific market or customer criteria.

### 3.6.3 Special Requirements for Export of Aquaculture Products

In addition to provisions in section 3.6.2, the following requirements apply for export of products originated from aquaculture:

- 3.6.3.1 Establishments intending to process aquaculture products meant for export shall have a specific approval given by the Fisheries Competent Authority based on their supply of raw materials as specified in section 3.6.3.2.
- 3.6.3.2 Establishments shall export aquaculture products only from raw materials procured from farms Listed and monitored by Fisheries Competent Authority, as provided for in section 4.3.4.
- 3.6.3.3 Processing facilities shall accept raw materials from aquaculture only after ensuring that the animals have not undergone illegal treatments and, if allowed treatment has been done, that withdrawal period according to section 3.2.2.11 is adhered to. Records of traceability pertaining to each lot of raw material shall be maintained by the establishment.
- 3.6.3.4 Under the HACCP System, food business operators shall conduct regular audits of the farms from where they procure aquaculture products to verify that the farms are following Good Aquaculture Practices (GAQP) specifically that they comply with legal requirements as regard are use of veterinary medicines and other chemicals. They shall maintain audit reports for verification by the FCA.

### 3.6.4 Additives and Ingredients

- 3.6.4.1 Additives and ingredients shall be controlled as per requirements in section 3.6.1.2.c and the food business operator shall further ensure that the additives used are allowed for the type of product on the intended market and shall obtain documentation for such requirements from liable sources, e.g. legislation or guidance from the competent authority of the market.
- 3.6.4.2 The HACCP system shall include control measures ensuring additives to be present in the final product only in concentrations allowed for the specific product at the specific market.
- 3.6.4.3 If additives are used, this shall always appear on the label or on accompanying documents to the final product, according to specific marked conditions.
- 3.6.4.4 Substances used for the protection of plants and plant products or for treatment of animal or human diseases shall never be used as additives in or come in contact with fishery products intended for human consumption.
- 3.6.4.5 The Cambodian Standard CS 260:2014 for Food Grade Salt<sup>11</sup> shall apply to salt used in processing of fishery products.

### 3.6.5 Toxic Fishes

- 3.6.5.1 Fishery products derived from poisonous fishes belonging to the families like Tetraodontidae, Molidae, Diodontidae, and Canthigasteridae may be processed in the approved establishment/factory vessel/freezer vessel only under the supervision of qualified persons, for which special permission shall be obtained from the FCA. However, poisonous fishes belonging to the above-mentioned families are prohibited for export to European Union.

<sup>11</sup> Compliant with Codex Stan 150-1985

## 3.7 Process Control – Processing and Associated Actors

### 3.7.1 Hygiene and Sanitation

- 3.7.1.1 Food business operators shall ensure proper hygiene and sanitation throughout the handling, transportation and storage of fish and fishery products to avoid introduction and multiplication of microbial contaminants. Food business operator shall comply with requirements in Chapter 4.10 of the CQS manual and, where relevant, also the Annex 1 of the CQS Manual. Further the specific provisions described in section 3.7.1.2-3.7.1.5 below shall be observed.
- 3.7.1.2 Food business operator shall develop a written cleaning and sanitation procedures, which shall cover cleaning and sanitation of all areas of the establishment, including utensils and equipment, on laid down frequencies.
- 3.7.1.3 Cleaning and sanitation procedures shall use only chemicals allowed for food contact surfaces and shall be designed so to avoid risk for contamination of the food with the chemicals.
- 3.7.1.4 Effectiveness of cleaning and sanitation shall be ensured by visual inspection and also by testing of swab samples taken from food contact surfaces for verification, at least where this is deemed necessary to ensure controlling the risk for contamination of ready to eat food. Annex 4 provides further guidance in this regard.
- 3.7.1.5 Records of cleaning and sanitation and also the test results of swab samples shall be maintained for verification by the FCA.

### 3.7.2 Personal Hygiene

- 3.7.2.1 Since employees may be a source of contamination, food business operators shall develop proper control measures to ensure their personal hygiene, appropriate movements and behaviour. Food business operators shall ensure compliance with all parts of chapter 7.1, 7.2 and 7.3 of the CQS Manual and, where relevant also the Annex 1 of the CQS Manual. Further food business operators shall observe the specific requirements in section 3.7.2.2-3.7.2.7 below.
- 3.7.2.2 Sufficient number of facilities shall be provided at appropriate places to enable the workers to clean and sanitize their hands and feet and to wear clean work clothes before each entry to the fish handling areas.
- 3.7.2.3 Utmost care shall be taken by the workers to maintain hygiene and sanitation while handling cooked or other ready to eat products to avoid microbial contamination and toxin formation.
- 3.7.2.4 Workers shall not eat, talk, cough, sneeze, and spit etc. inside fish handling areas. They shall trim their nails and remove their ornaments before entering the processing areas. They shall wear clean work clothes.
- 3.7.2.5 The movements of employees, utensils and equipment shall be restricted to prevent cross contaminations.
- 3.7.2.6 Workers suffering from injury or disease shall not be permitted to work inside the fish handling area. Each employee working in the processing areas shall have a health certificate issued by an authorized medical practitioner stating that he/she is fit to work in a fish processing establishment and the certificate shall be renewed

every year. Employees shall conduct medical examination before joining for duty after taking leave on medical ground. Special Measures in View of COVID19 may apply.

- 3.7.2.7 During a COVID-19 epidemic, the establishments shall implement the relevant national guidance of prevention and control measures and Food Safety specific measures issued by FAO and WHO<sup>12</sup>. This means specifically to carry out periodic tests of COVID-19 for their staff, to develop necessary prevention and control measures for aquatic products safety, and to ensure the effective implementation of those measures in the whole process of the raw material, processing, packaging, storage, and transportation, to prevent contamination.

### 3.7.3 Quality of Water and Ice

- 3.7.3.1 Food business operator shall implement control to document that the quality and safety of water and ice used in their factory comply with required standards. For this purpose, food business operator shall comply with chapter 4.4 of the CQS Manual and, where relevant, also the Annex 1 of the CQS Manual. Further the food business operators shall observe the specific requirements outlined in section 3.7.3.2-3.7.3.5 below.
- 3.7.3.2 Processing establishment approved for export to EU shall sample water used for processing and ice production and have it tested in a laboratory recognised for this by the FCA for compliance with criteria as per EC Directive (EU) 2020/2184, Annex II and Annex I Part A and C at least two times per year and for compliance with criteria as per EC Directive (EU) 2020/2184 Annex 1 Part B once per year, or whenever the source of water or ice is changed. Processing establishments approved for export to China shall sample and test water used for processing against criteria in Chinese Standard GB 5749-2006.
- 3.7.3.3 Establishment approved for export to countries, with no specific criteria for processing water, shall test water used for processing and ice production as per the Cambodian Drinking Water Quality Standards<sup>13</sup> at least two times per year and as deemed necessary to document food safety.
- 3.7.3.4 Ice shall comply with the same criteria as water used for the production of the ice.

### 3.7.4 Pest Control

- 3.7.4.1 Food business operators shall take suitable measures to ensure a pest free environment inside the establishment. For this purpose, the food business operator shall comply with all provisions in chapter 4.12 of the CQS Manual and, where relevant, also the Annex 1 of the CQS Manual. Further food business operators shall observe the requirements in section 3.7.4.2-3.7.4.3 below.
- 3.7.4.2 Elimination of shelters and attractants of pest in the surroundings shall be done to ensure pest free environment.
- 3.7.4.3 Records of pest control activities shall be maintained for verification.

<sup>12</sup> FAO. 2021. COVID-19: Guidance for preventing transmission of COVID-19 within food businesses. Updated guidance. Rome. <https://www.fao.org/3/cb6030en/cb6030en.pdf>

<sup>13</sup> Cambodian Drinking Water Quality Standards, <https://www.fao.org/faolex/results/details/en/c/LEX-FAOC210689>

### 3.7.5 Time and Temperature Control

- 3.7.5.1 As a major tool to control contamination by growth of microorganisms and toxin formation, all processing establishments shall implement time temperature control starting from the procurement of raw material till shipment of the consignment and as adequate for the related raw materials and products.
- 3.7.5.2 Fish raw materials, intermediate products and final products shall be kept at temperature below +4°C at any time, unless in short periods of processing or fermented fish production where practicalities do not need or allow to maintain the low temperature. Such periods shall be as short as possible and the time-temperature shall be controlled and documented under the GMP/HACCP monitoring as adequate.
- 3.7.5.3 Special precaution shall be taken to avoid temperature abuse while procuring, transporting and processing histamine forming fishes.
- 3.7.5.4 All temperature recording devices shall be calibrated on a laid down frequency.
- 3.7.5.5 Cooking and freezing devices shall be validated to ensure that the applied time-temperature profile is adequate to achieve the intended core temperature.

### 3.7.6 Control of Cross Contamination

- 3.7.6.1 Food business operators shall design and implement control measures to prevent cross contamination with biological or chemical contaminants from unsanitary objects to food and /or food contact surfaces and to this end comply with all provisions in chapter 4.8, 4.9 and 4.11 of the CQS Manual and, where relevant, also the Annex 1 of the CQS Manual. Such measures may include proper maintenance, cleaning and sanitation, employee's hygiene, employee movement and behaviour, pest control, waste management, time and space separation etc.
- 3.7.6.2 Only food grade lubricants shall be used inside the food handling and processing area.

### 3.7.7 Traceability

Food business operators shall develop and implement methods to trace the source of raw materials, ingredients and packing materials, from its origin through all stages of production, processing and distribution. Lot identification is essential in product recall and in stock rotation and shall be applied.

### 3.7.8 Storage

- 3.7.8.1 Food business operators shall comply with all provisions in chapter 4.13 of the CQS Manual and, where relevant, also the Annex 1 of the CQS Manual. Further food business operators shall adhere to the specific requirements stipulated in section 3.7.8.2-3.7.8.5 below.
- 3.7.8.2 Fresh fishery products, thawed/unprocessed fishery products, and cooked and chilled products must be stored at a temperature approaching that of melting ice. If fishery products are kept under ice, the ice shall be allowed to melt, but the melt water shall be drained away from the products continuously; containers for such purpose shall therefore be designed with appropriate drainage facility.

- 3.7.8.3 Frozen fishery products during storage shall be kept at a temperature of not higher than  $-18^{\circ}\text{C}$  in all parts of the products.
- 3.7.8.4 Cleaning and sanitation chemicals, and other chemicals, shall be stored separately under lockable condition with proper labels, including instructions on worker safety during handling.
- 3.7.8.5 Food grade ingredients shall be stored under clean conditions and at temperature and other conditions as prescribed by the supplier and so they are not adulterated due to humidity, dust, vermin etc.

### 3.7.9 Transportation

- 3.7.9.1 Food business operators shall comply with all requirements in chapter 4.14 of the CQS Manual and, where relevant, also the Annex 1 of the CQS Manual. Further Food business operators shall observe the requirements stipulated in section 3.7.9.2-3.7.9.5 below.
- 3.7.9.2 Vehicles used for transporting fish and fishery products and ice shall have clean, smooth storage areas made up of non-corrosive material that will not contaminate the product. Cleaning and sanitation of vehicles shall be done before and after the use and the records of cleaning shall be maintained.
- 3.7.9.3 Frozen fishery products, with the exception of whole fish initially frozen in brine for the manufacture of canned food, must be maintained during transport at an even temperature of not more than  $-18^{\circ}\text{C}$  in all parts of the product, possibly with short upward fluctuation of not more than  $+3^{\circ}\text{C}$ .
- 3.7.9.4 Vehicles used for the transportation of fishery products and ice meant for export purpose shall be approved and monitored by the FCA.
- 3.7.9.5 Refrigerated vehicles approved for transporting fishery products meant for export to EU shall have temperature recording device which shall comply with EN 12830, EN 13485 and EN 13486 standards.

### 3.7.10 Packaging

Fish and fishery products meant for export shall be packed in export worthy containers/packets that will not impart contamination or undesirable changes in the product but will give sufficient protection to the product until it reaches the customer. Requirements of chapter 5.2 of the CQS Manual shall apply.

### 3.7.11 Labelling

- 3.7.11.1 Proper information about the product shall be given to the consumer through labelling, invoice, or other commercial documents accompanying the goods. However, in no circumstances, false, misleading or illusory information shall be given in the label as regards to the nature, identity, properties composition, quantity, durability, origin, production or processing methods of the product. Chapter 5.1. of the CQS manual shall apply and further requirements as stipulated in section 3.7.11.2-3.7.11.3 shall be observed.
- 3.7.11.2 General Requirements:  
The outer packages of fishery products meant for export, that has to undergo further processing at the destination, shall have the following minimum information printed/ stencilled/ pasted in English or in the language of the importing country or both.

- a. Registration No of the establishment
- b. Name of the country of origin
- c. Production date
- d. Name of product (common name)
- e. Trademark if applicable

Additional requirements of importing country, if any, shall also be complied with.

#### 3.7.11.3 Specific Requirements

1. In case of food is packed so to be sold directly to the consumer, following additional information to point 3.7.11.2 shall be given in the label:
  - a. Name under which the product is sold
  - b. Common name and scientific name of the fish included
  - c. List of ingredients in descending order of proportion
  - d. Name and/or E-number or INS-number of additives used in the product
  - e. Net weight and where relevant drained weight
  - f. Date of Production (directly and/or with lot code)
  - g. Date of minimum durability or best before
  - h. Storage conditions or condition of use
  - i. Name/business name of the manufacturer or packer
  - j. Information on nutritional value
2. Any ingredient known to allergenic shall always be declared. (e.g.: Crustaceans or sulphite). Any ingredient which has been treated with ionizing radiation should also be declared.
3. Notwithstanding the points 1 and 2 above, the food business operator shall always ensure that labelling of the products, as a minimum, comply with the legal requirements of the market for which the product is intended. This may be additional or more specific requirements including, but not be limited to:
  - a. Commercial and Scientific name of the fish included in the product.
  - b. Production method for the fish included in the product (Wild catch or Aquaculture and fishing gear).
  - c. Catch area (FAO area code for sea catch, country name for aquaculture and fresh water catches).
  - d. If the name of the product indicates the presence of an ingredient determining for the product, the percentage of that ingredient shall be indicated (e.g. fish in tomato sauce; the amount of tomato sauce shall be indicated).
4. Where an export market does not specify requirements to labelling, the Prakas on Cambodian Standard CS 001-2000 labelling of food product and provisions in the Cambodian Food Safety Law, 2022 shall apply.

### 3.8 Special Requirements for Export of Live Fish

- 3.8.1 The export of live fish for human consumption shall take place only from establishments that are under supervision and monitoring of the FCA. Only if the FCA confirms that the fish and its harvest area, comply with aquatic animal health requirements of the intended market, export shall be allowed (see also chapter 5 in these Technical Requirements).
- 3.8.2 Establishments that intent to export live fish shall be Approved, for this by the FCA in compliance with provisions in the chapters 2.2 and 4.2. Registration and Approval shall be conditional to:

- a. Implementing of principles of GMP, GHP and principles of HACCP as provided for in chapter 3.5 and in line with the type of operations in “Asia Regional Technical Guidelines on Health Management for the Responsible Movement of Live Aquatic Animals” and “Standard Operating Procedures for the Responsible Movement of Live Aquatic Animals for ASEAN” of 2015.
  - b. The transport of live fish intended for human consumption shall take place in a way that do not alter the viability of the fish.
- 3.8.3 Health Certificates for food safety of live fish intended for export for human consumption shall be issued by FCA, as provided for in chapter 4.6.
- 3.8.4 Certificates on compliance with aquatic animal health and requirements of CITES live fish intended for export for human consumption, shall be issued by FCA as stipulated in the Cambodian Fisheries Law, 2006 article 68 and as per specific market requirements and international commitments.

### 3.9 Management Commitment

- 3.9.1 The management of FBOs shall express commitment to comply with all the provisions in the CQS Manual part 1.1 and 1.2 and additionally to the provisions in points 2-4 below.
- 3.9.2 The Management shall be committed to the development, maintenance, operation and continued improvement of the food safety management system as described in chapter 2 and 3 of these Technical Requirements, and to provide resources as necessary for this.
- 3.9.3 The Management shall be committed to meeting the national and international food safety requirements as well as specific customer requirements relevant for their export.
- 3.9.4 They management be committed to conduct management reviews regularly to ensure that the food safety management system and conditions of implementing are effective to maintain food safety and quality and quality of the exported products.

### 3.10 Management Responsibility

- 3.10.1 The Management of the processing facility shall comply with all the provisions in the CQS Manual part 1.1 and 1.2 and additionally to provisions in point 2 below.
- 3.10.2 Work instructions shall be clearly laid down as to the responsibility in case of failure. All personnel in the organisations shall have the responsibility to report immediately to the management in cases which may lead to or constitute an immediate risk for production or distribution of food that is not safe or in compliance with requirements in this document.

### 3.11 Training

- 3.11.1 The management shall ensure that all staff and management members are trained in food hygiene and food safety management as relevant for their work responsibility. Training may be class room training or hands on training as deemed relevant for different work responsibilities. Records of all such training shall be documented
- 3.11.2 Planning, implementing and verification of the effectiveness of the training shall adhere to all the provisions in the CQS Manual chapter 7.1.

# OFFICIAL CONTROL ACTIVITIES



## CHAPTER IV: OFFICIAL CONTROL ACTIVITIES

### 4.1 Requirements of the Fisheries Competent Authority

#### 4.1.1 Responsibility

- 4.1.1.1 The assigned Fisheries Competent Authority (FCA) shall plan and conduct official controls to verify that the objectives in these Technical Requirements are complied with by all business operators and facilities in the value chain for fishery products produced in and intended for export from Cambodia.
- 4.1.1.2 The FCA shall define and establish MOU and procedures for Listing and regular joint inspections of certain defined types of facilities with Ministry of Industry, Science, Technology and Innovation (MISTI).
- 4.1.1.3 The assigned FCA shall also assist the General Department of Customs and Excise to control food safety of imported fishery products as provided for in chapter 5.
- 4.1.1.4 The FCA shall ensure that the official controls are carried out regularly on a risk basis and with appropriate frequency, taking account of:
- a. The specific risk to food safety related with the different type of operations and products
  - b. The facilities past record of compliance with this requirements or specific market criteria
- 4.1.1.5 The official controls shall be carried out without prior warning except in cases where the notification or presence of the food business operators is specifically required.
- 4.1.1.6 The official controls shall include provisions for the FCA to require corrective actions towards non-compliances with requirements, as a condition for food business operators to maintain their eligibility to export fishery products.
- 4.1.1.7 The FCA may initiate legal actions according to the Cambodian Food Safety Law NS/RKM/0622/006 chapter 9 and the Cambodian Fisheries Law, 2006 chapter 14, in cases of food business operators' non-compliance with provisions in these Technical Requirements.
- 4.1.1.8 The FCA shall apply a transparent approach, specifically keep the food business operators informed about their procedures and practices and results of official controls.
- 4.1.1.9 The FCA shall keep itself, and related business operators, updated about specific requirements to official controls as required by certain export markets; to this end the FCA shall ensure that:
1. The competent authorities of such export markets are timely provided and updated with the required information.
  2. The requirements of the export markets are addressed as appropriate by food business operators and by FCA to facilitate the export of fishery products from Cambodia
  3. FCA may delegate official control tasks to other control bodies on the condition that:
    - a. There is an accurate description of the tasks and of the conditions under which it shall be carried out.
    - b. There is and effective communication and coordination between the control body and the FCA.
    - c. There is proof that the control body:

- i. Has the expertise, equipment and infrastructure required to carry out the tasks delegated to it
- ii. Has a sufficient number of suitably qualified and experienced staff
- iii. Is impartial and free from any conflict of interest as regards the exercise of the tasks delegated to it
- iv. Comply with operational criteria at least as specified by FCA.

#### 4.1.2 Operational Criteria

- 4.1.2.1 The assigned FCA shall have legal power to conduct official controls and take the measures provided for in these Technical Requirements. The FCA shall have legal power to close down or delisting of the food business operator in the event of non-compliance based on the risks.
- 4.1.2.2 The assigned FCA shall have financial, technical and human resources adequate to perform the official controls efficiently, including at least:
  - a. Adequate and proper maintained equipment and facilities
  - b. Access to adequate laboratory facilities operating in line with international standards
  - c. Staff who are trained as appropriate to their duties and able to carry out the controls in a consistent manner
- 4.1.2.3 The staff carrying out official controls shall be impartial and free from any conflict of interest towards the food business operators and facilities subject to the official controls.
- 4.1.2.4 The assigned FCA shall operate in line with internationally and regionally recognised quality management and performance standards and/or criteria required by specific export markets. The assigned FCA shall therefore establish and maintain updated internal procedures, work instructions and systems of documentation and communication for the staff and management, which:
  - a. Facilitate uniform performance of the official controls, including actions in case of non-compliances:
  - b. Allow for actions to ensure, in due cooperation with the related business operators, the removal of Cambodian fishery products from any market, if such products, after being placed on the market, are found to be unsafe for the consumers.
  - c. Allow for internal verification of efficiency all official control activities.
  - d. Document results by methods that allow for trend analysis of data in context of the risk-based approach.
  - e. Facilitate transparency, specifically towards communication with the involved business operators and facilities
  - f. Ensure maintenance of confidentiality as regard all information and knowledge gained during the official control activities.

#### 4.1.3 Principles of Official Control

- 4.1.3.1 The methods of official control shall be selected and designed so they are suitable to address the objective, risk profile and scope of each facility.
- 4.1.3.2 The methods may include, but not necessarily be limited to:

1. Inspection and audit of hygiene conditions, management of good practices and food safety management procedures in:
    - a. Primary production and associated actors which are Listed to supply the value chain for export of fishery products for specific markets in reference to section 4.2.1, to assess compliance with requirements in these Technical Requirements and any further specific market requirements.
    - b. Processing facilities which are Registered and Approved to export fishery products, to assess compliance with requirements in these Technical Requirements and any further specific market requirements.
  2. Assistance to the General Department of Customs and Excise, to assess fishery products intended for import to Cambodia for the purpose of human consumption, for compliance with food safety requirements in these Technical Requirements.
- 4.1.3.3 The inspection and audit may include, but not necessarily be limited to:
- a. Assessment of facilities and practices of operation in the facilities
  - b. Assessment of the operators written food safety management systems and materials including their records of monitoring and verification
  - c. Interviews with food business operators and staff members
  - d. Reading of the values recorded by the operators
  - e. Measuring of food safety parameters with own test equipment
  - f. Sampling and testing for the purpose of official control where it is deemed appropriate to verify compliance with requirements in these Technical Requirements. Sampling and testing may include but not be limited to raw materials, semi-finished products, final products, ice, potable water and surfaces in contact with food.
  - g. Defining and implementing of monitoring programs for specific hazards e.g. histamine and environmental contaminants.
  - h. Surveillance of specified activities of defined food business operators or activities at random frequency and time.

## 4.2 Approval and Listing

### 4.2.1 Listing of Primary Production and Associated Actors to Supply for Export

- 4.2.1.1 The assigned FCA shall keep a list of listed establishments with reference to a unique identity code of all primary producers and associated actors (as defined in chapter 1) under mandatory official control for verification of compliance with these Technical Requirements. The primary producers and associated actors under mandatory official control are those to be Listed to supply raw materials or other input to the value chain for export of fishery products to certain markets as specified in section 4.2.1.6.
- 4.2.1.2 The FCA shall announce to the food business operator(s) which markets that require Listing, including information about the specific requirements or conditions for such Listing of different operators.
- 4.2.1.3 The food business operators shall apply to the FCA for Listing to supply for export to different markets. The FCA shall establish procedures, work instructions and checklists as adequate for receiving and assessment of such application, and the food business operator shall be informed about such procedures in due time.

- 4.2.1.4 The FCA shall assess an application for Listing on the basis of the application and required supporting documents, and the result of inspection or audit of the practices against these requirements or specific export market requirements.
- 4.2.1.5 The supporting documents to an application for Listing shall include, but not necessarily be limited to:
  - a. Valid business licence for operation issued by the relevant authorities.
  - b. Layout of facilities and description of practices
  - c. Documentation related to procedures and practices for control of hazards and traceability related with the operations on the facility.
- 4.2.1.6 Currently Listing by FCA of primary producers and associated actors under mandatory official control applies to fishing vessels, aquaculture farms, landing sites, and collection points, which provide or distribute raw materials intended for export to the EU market.
- 4.2.1.7 Listing of facilities producing salt and ice for use in fishery products intended for export shall be established in cooperation with MISTI as provided for in section 4.1.1.2.

#### **4.2.2 Listing and Approval of Processing Factories for Export to Specific Markets**

- 4.2.2.1 Certain export markets require that the FCA establish and maintain lists of export establishments that are specifically designated to export to that market, subject to compliance with specified requirements.
- 4.2.2.2 The markets requiring specific Listing/Approval include, but may not be limited to, EU (Approval of processing factories and independent cold stores), China (Listing of fish processing factories, feed processing factories and warehouses), Vietnam (Listing of fish processing factories), US (Listing of processing factories for export of fish of the order Siluriformes), Australia, New Zealand and South Korea.
- 4.2.2.3 The Listing and Approval may be general or limited to specific products or groups of products.
- 4.2.2.4 Only establishments which are Registered and Approved for export by FCA to export fishery products (Approval ID), as stipulated in chapter 2.2 of this document, shall be Listed or Approved for the specific markets.
- 4.2.2.5 The Listing and approvals for specific markets according to section 4.2.2.2 and 4.2.2.3 shall be based on application by the food business operator and the FCA shall announce and provide guidance in this regard.
- 4.2.2.6 The FCA shall establish procedures and work instructions for the official controls related to assessment of applications and for establishing and maintaining of the Listings and Approvals for specific markets as referred to in section 4.2.2.2.
- 4.2.2.7 The FCA shall assess an application for Listing or Approval on the basis of the application and required supporting documents and the result of inspection or audit of the practices against the requirements of these Technical Requirements or specific export market requirements.
- 4.2.2.8 The supporting documents to an application for Listing or Approval shall include, but not necessarily be limited to:
  - a. Any specific documentation required by the related export market
  - b. Documentation related to valid Approval for export

- c. Layout of facilities and description of practices
  - d. Documentation related to HACCP system and pre-requisite programs
  - e. Documentation related to raw material suppliers and other stakeholders in the value chain, if so, required by the market.
- 4.2.2.9 The Listing or Approval for specific export markets is subject to continued compliance with the stipulated criteria. If the results of official controls, as stipulated in section 4.2.2.7 or in chapter 4.3, show that an establishment do not comply with criteria related with a Listing or Approval, the FCA shall not allow the establishment to export to the market until compliance is re-installed.
- 4.2.2.10 The FCA shall establish documented procedures and work instructions for permanent or temporarily withdrawal of a Listing or Approval and inform the food business operators accordingly.

## 4.3 Methods of Official Control

### 4.3.1 Surveillance Visits

- 4.3.1.1 Surveillance visits may be carried out to any facility at any time.
- 4.3.1.2 Surveillance visits may be announced or un-announced depending of the objective and context of the visit.
- 4.3.1.3 Observations may be carried out as:
- a. Observations/assessment of practices of relevance when conducting target sampling, e.g. under the residue monitoring program or in context of the pre-export assessment.
  - b. Specific planned activities, e.g. the assessment of raw material quality and practices on landing sites, collection points and auctions.
  - c. Specific assessment to verify the corrective active action taken by the FBO on the non-compliances observed during audits
  - d. Short visits for gathering of information e.g. in feed distribution centres, Listed or non- Listed landing sites, collection points and auctions.
- 4.3.1.4 Activities and observations in surveillance visits shall be recorded in context of the key activity, e.g. on the sampling report or the pre-export verification reports or if planned activity on separate records.
- 4.3.1.5 If during a surveillance visit the officer of FCA finds conditions or practices in non-compliance with these Technical Requirements, the officer shall take steps as necessary to issue a formal request of Corrective Action in reference to chapter 4.4 and further documented internal procedures.

### 4.3.2 Inspection

- 4.3.2.1 Inspection is a planned activity that may be carried out to any establishment at any time in the value chain, including for example but not limited to primary producers, processing establishments, and associated actors as defined in chapter 3 of these Technical Requirements.
- 4.3.2.2 The purpose of inspection is to verify that the establishment comply with the general hygiene and food safety criteria which apply to the establishment.
- 4.3.2.3 The FCA shall document and implement procedures and work instructions for

frequency of planned inspections to each type of establishments and inform the food business operators accordingly. The frequency of inspections shall be risk based considering the following:

- a. The type of product and establishment (risk based)
- b. The previous performance of the establishment (past record of compliance)
- c. The existence of unforeseen events (e.g. market rejections, non-compliant results in sampling and testing)

**Annex 6** of these Technical Requirements provides for the detailed principles of risk characterisation and the related inspection frequencies that should apply.

- 4.3.2.4 Inspections shall be carried out in reference to documented procedures and checklists reflecting the legal requirements which apply to the establishment and its related Listing or Approval.
- 4.3.2.5 Inspections may include but not be limited to:
  - a. Assessment of physical facilities
  - b. Assessment of practices
  - c. Interview of management and operators
  - d. Review of written work procedures, instructions and results of monitoring related to control of food safety and hygiene to assess whether they are adequate to control food safety efficiently.
  - e. Sampling of final products, raw-materials, semi-manufacture, water, ice, ingredients, packaging materials and swap test of food contact surfaces.
- 4.3.2.6 Results of inspections shall be recorded in systematic way. The food business operator shall be informed about the outcome of and inspection in a written report. The report shall identify the establishment representative, the name of the inspectors, the scope of the inspection and the result of the inspection, specifically identified non-compliances with this requirements or specific market criteria, to which the establishment is Listed or Approved.
- 4.3.2.7 If during inspection the officer of FCA finds conditions or practices of non-compliance as stipulated the officer shall issue a formal request of Corrective Action in reference chapter 4.4 and further documented internal procedures.
- 4.3.2.8 A formal Corrective Action Request following an inspection result shall identify the non-compliance and the related objective evidences with reference to the legal requirements and the request to identify and implement adequate Corrective Action within a time limit.

### 4.3.3 HACCP Assessment

- 4.3.3.1 HACCP is a planned activity that shall be carried out in establishments that apply either mandatory or voluntary HACCP, including specifically processing establishments.
- 4.3.3.2 The purpose of the HACCP Assessment is to verify that the establishment documents and implements food safety management measures in accordance with the principles stipulated in chapter 3.5 of this document, and that the implemented measures are adequate to ensure efficient control of food safety.
- 4.3.3.3 Regular HACCP Assessment shall be planned, implemented and documented according to the principles described in section 4.3.2.3 – 4.3.2.8, however in addition to section 4.3.2.5 include also:

- a. Assessment of the correct application of the 7 principles and 12 preliminary steps as provided for in chapter 3.5.
- 4.3.3.4 HACCP Assessment shall always be conducted in response to a request for Listing or Approval to one of the markets identified in chapter 4.2.

#### 4.3.4 National Residue Monitoring Program (NRMP) for Products from Aquaculture

- 4.3.4.1 The FCA shall implement a national monitoring program to verify that residues of veterinary medicines and environmental contaminants, in fishery products from aquaculture in Cambodia are not present in levels which may harm the consumers and which are below limits required by the markets which the products are intended for.
- 4.3.4.2 The FCA shall ensure that the NRMP is managed and supervised by a cross functional Residue Monitoring Committee (RMC) with expertise and management representatives from areas of management of aquaculture, control of authorisation, distribution and use of veterinary medicines, laboratory testing relevant to the program and requirements to food safety requirements/official controls on the EU market.
- 4.3.4.3 Residue Monitoring Committee (RMC) shall decide and ensure enforcement of remedial measures in cases of detection of distribution and use of prohibited veterinary medicines and in cases of misuse or misguidance related to distribution and use of authorised veterinary medicines. Such remedial measures may include but not be limited to suspension of the farm, hatchery and/or feed mill involved in the illegal activity until such time FCA is satisfied that the activity will not re-occur<sup>14</sup>.
- 4.3.4.4 The FCA shall establish and implement documented procedures for:
  - a. Planning, implementing and reporting the results of the program on an annual basis.
  - b. Investigations of cases of non-compliant findings with focus on identifying root causes
  - c. Actions against cases of non-compliant findings, with focus on ensuring that the products are withdrawn or not placed on the market and minimizing the risk for re-occurrence of the case.
- 4.3.4.5 All processing establishments and their related aquaculture farms that are Approved for export of products from aquaculture to the China, South Korea, Australia, New Zealand and EU Markets shall be included in the NRMP. Other processing establishments and their related aquaculture farms may be included by request or by the decision of the FCA.
- 4.3.4.6 The objective of the program shall be to:
  - a. Detect the illegal use of prohibited veterinary medicines.
  - b. Detect the illegal or wrong use of allowed veterinary medicines.
  - c. Collect data in support of management towards responsible management of veterinary medicines in animals intended for food.
  - d. Monitor the level of environmental contaminants, specifically heavy metals, residues of pesticides, PCBs, dioxin and dioxin like PCBs in fish from different harvest and farming areas.

<sup>14</sup> DG-Decision No. 955 FIA dated 22 March 2024 on Technical Order for the Implementation of Residue Monitoring Program in Aquaculture in Kingdom of Cambodia.

- 4.3.4.7 The program shall be based on annual plans for sampling and testing considering:
- a. Risks related with potential illegal substances on the market.
  - b. Risk related with potential wrong use of legal substances.
  - c. Risks related with specific potential environmental contaminations in related areas (run off from farming areas, mining, etc.).
  - d. The amount of production in the included farms.
  - e. The necessary laboratory testing capacity and capability.
  - f. The results of previous year sampling and testing.
  - g. Any specific market requirements to the program, specifically the EU regulation 2022/2292.
  - h. Cambodian legislation on authorisation, distribution and use of veterinary medicines in products of aquatic animal origin<sup>15</sup>.
  - i. Cambodian legislation on prohibited and allowed pesticides.
- 4.3.4.8 The program shall provide annual reports on the implementing of the program and the results obtained, with specific focus on actions taken towards non-compliant findings.
- 4.3.4.9 The FCA shall submit the NRMP results of the previous year and the plan for the next year to relevant authority in EU on or before 31 March every year. If required, this can also be sent to other countries on demand

#### 4.3.5 Laboratory Services for Official Control

- 4.3.5.1 Sampling and testing of fishery products intended for export, for the purpose of official control, shall be planned and conducted in reference to international recommended standards or method descriptions, e.g. ISO, AOAC, FDA-BAM, APHA, NMKL-NorVal International.
- 4.3.5.2 Where import markets require testing with specific methods or with methods complying with specific performance criteria such methods, or methods that has been demonstrated to be equivalent, shall be used.
- 4.3.5.3 Laboratories used for sampling and testing for purpose of official control shall apply systematic quality management following international standard, specifically the laboratory shall:
- a. Document their validation of all test methods used for purpose of official control, specifically document performance criteria which may be required by specific import markets.
  - b. Participate in internationally recognised proficiency tests on a regular basis for the test methods used for purpose of official control.
  - c. Ensure and document that staff assigned to do testing are qualified and able to conduct the tests in accordance with specified performance criteria.
  - d. Issue analytical reports for all testing, following international standard and be able to document traceability for all data collected from receiving the sample to the issuing of the Analytical report.
- 4.3.5.4 The FCA shall maintain a List of laboratories that may be used for testing for purpose of official control. Laboratories shall comply at least with provisions in section 4.3.5.3 while accreditation to ISO 17025 for the criteria and test methods to be used shall be preferred.

<sup>15</sup> DG-Decision No. 954 FIA dated 22 March 2024 on Technical Order for the Use of Aquatic Medicinal Products in the Kingdom of Cambodia.

## 4.4 Actions in Case of Non-Compliance

- 4.4.1. In case of non-compliance with regulatory requirements as stipulated in this document, the FCA is empowered to take suitable actions against the involved food business operators under the Cambodian Food law NS/RKM/0622/006 chapter 9 and under Cambodian Fisheries Law, 2006 chapter 14.
- 4.4.2. The actions may include, but not be limited to, levying penalty, withholding health certificates, imposing suspension or withdrawing of the Approval or Listing granted for export.
- 4.4.3. The FCA shall establish and implement documented procedures for deciding and managing actions in case of non-compliances and inform the food business operators accordingly.

## 4.5 Procedures to Removal of Unsafe Food from the Market

- 4.5.1 The FCA shall establish and implement documented procedures covering their role in prompt removal from the market of fishery products that are deemed to be unsafe for the consumers. Such procedures shall cover cases where:
  - a. The food business operator shall inform the FCA, in accordance with section 3.3.1.2 of this document, that a product has been deemed unsafe, or for other reasons, rejected from an export market.
  - b. The FCA receive information from the competent authority of an export market, that a fishery product from Cambodia is deemed unsafe and to be rejected for import or to be withdrawn from that market.
- 4.5.2 The FCA shall ensure that all establishments, which are Listed or Approved for export of fishery products from Cambodia, have documented procedures for communicating with the FCA and for taking actions as appropriate to withdraw or recall of their products from the market if and when such is deemed necessary for protection of consumers.
- 4.5.3 The FCA shall oversee and, if deemed necessary for protection of consumers, request specific measures to recover, re-direct or dispose of products that are rejected or withdrawn from an export market. The involved business operators shall have affirmative duty to give effect to request from the FCA in this regard.
- 4.5.4 The FCA shall establish documented procedures for the controls to be conducted and leading to the decisions about measures to recover, re-direct or dispose of products that are withdrawn from an export market.
- 4.5.5 The FCA shall establish documented procedures for their investigation of cases of rejection or withdrawal due to other market complaints. The investigation shall analyse the cause for the market rejection or complaint and lead to decisions on Corrective Actions to be taken by the involved business operator(s) who shall have affirmative duty to give effect to request from the FCA in this regard.
- 4.5.6 In reference to the results of an investigation specified in chapter 4.4 the FCA is empowered to take suitable action against the involved facilities under the Cambodian Food law NS/RKM/0622/006 chapter 9 and under Cambodian Fisheries Law, 2006 chapter 14.

## 4.6 Export Certification

### 4.6.1 Health Certificates for Fish and Fishery Products

- 4.6.1.1 The FCA shall establish procedures to issue Health Certificates or other certificates of compliance with food safety requirements as required from different markets in

- reference to Sub-decree/Anukret 370 dated on 28 December 2023, Annex 5 section II.
- 4.6.1.2 If a market require certification for absence of specific animal diseases, the FCA shall cooperate with the relevant sections of Department of Aquaculture Development, to provide the relevant documentation as per article 66 of the Cambodian Fisheries Law, 2006.
  - 4.6.1.3 The FCA shall ensure that certificates are always issued on a valid template provided by the imported country if it is required.
  - 4.6.1.4 The FCA shall sign certificates only after assuring, by adequate verification, that the consignment complies with criteria and requirements specified by that market.
  - 4.6.1.5 The FCA shall establish documented procedures and work instructions for verification of compliance and issuing of certificates of compliance with food safety criteria. These pre-export verification procedures may include desk verification and/or onsite verification of the compliance with required criteria.
  - 4.6.1.6 The pre-export verification procedures mentioned in section 4.6.1.4 shall be decided based on risk and include history of compliance with HACCP requirements and compliance of previous consignments.
  - 4.6.1.7 For export markets which do not have own Health Certificates or certificates of compliance with food safety criteria, the FCA will issue Health Certificates on templates in Annex 1 to these Technical Requirements.
  - 4.6.1.8 The FCA shall inform food business operators about the requirements to Health Certification, or other certifications, including the procedures FCA has established in this regard.

## 4.7 Training

- 4.7.1 The FCA shall establish documented job descriptions for all key job functions related to managing and implementing official controls.
- 4.7.2 The FCA shall identify required key competencies for officers assigned to inspection, sampling or health certification and ensure that all staff members are trained as appropriate to their job function related with inspection, certification, sampling, reporting and administrative functions. General qualifications and areas of additional training are provided in Annex 2 of these Technical Requirements.
- 4.7.3 The FCA shall keep updated records of all staff members including CVs, training records and assignments for different job functions.

## 4.8 Transparency

- 4.8.1 Development of food safety standards and official control systems shall be done in a transparent manner as required in the Cambodian Food Safety Law, 2022 article 7(B). All the stakeholders of the food chain shall have equal opportunity to give their contributions. Co-operation of all stakeholders is essential for the success of any food safety system.
- 4.8.2 Public information and public consultation are the major tools in achieving the transparency. Therefore, FCA shall have regular meetings with all the stakeholders to collect their suggestions before finalizing the standards and also to update them with the latest national and international requirements. Information may also be communicated through social media, official letters, websites etc.

# IMPORT OF FISH AND FISHERY PRODUCTS



## CHAPTER V: IMPORT OF FISH AND FISHERY PRODUCTS

### 5.1 General Requirements

- 5.1.1 Establishments, companies or individuals that intend to import fish and fisheries products to Cambodia shall obtain and maintain a valid Import License issued by MAFF in accordance to Cambodian Law on Fisheries, 2006, article 67.
- 5.1.2 Article 7 of Sub-decree 21 provides GDCE and line ministries<sup>16</sup>, under which MAFF, with the overall policy responsibility for particular commodities or products, for which they are generally responsible for ensuring compliance with international obligations, compliance with national laws and regulations governing the control of these products. These agencies shall establish clear risk-based selectivity criteria for these particular commodities. Articles 10-14 of Sub-decree 21, 2006 requires the Custom and Exercise Department to establish inter-agency agreements with the different involved ministries, under which MAFF, detailing the classification of products and the controls that shall be conducted based on identified risks. Where the necessary expertise is not available within the GDCE the line ministries shall make such expertise available on request.
- 5.1.3 Sub-Decree No. 27 on "Adjustment/Restructuring of the Competent Institutions Controlling Exported and Imported Goods to Facilitate Trade and Strengthen Cambodian Competitiveness" dated January 28, 2019 of the Government of Cambodia, grants the General Department of Customs and Excise of the Ministry of Economy and Finance the sole authority to inspect imported and exported goods at international gates, international border gates, bilateral border gates, border area gates, and seaport gates, special economic zones, temporary storage facilities, and other places for inspecting imported and exported.
- 5.1.4 Sub decree No. 370 ANKr.BK, 2023 by the Royal Government of Cambodia (Anukret 370), establish lists of products that are subject to prohibition and restriction of importation-exportation and transit to and from Cambodia. The list, provided with Annex 2 of the Anukret 370, includes products that require an Import or Export Permit and Annex 3 provides the list of products that require certificate on pathology or health/quality from the exporting country.
- 5.1.5 The list of products that require Import or Export Permit, in Annex 2 of Anukret 370, includes specific products from all subcodes of HS codes 03. The List of products that require a certificate on pathology or health/quality from the exporting country, in Annex 3 of Anukret 370.
- 5.1.6 Establishments, companies or individuals with valid Registration and valid License to import fishery products shall comply with all regulatory requirements and administrative procedures for the import as stipulated by these Technical Requirements.
- 5.1.7 The FCA shall in cooperation with the GDCE establish criteria for food safety control of imported fisheries products in reference to Sub-decree 21, 2006 article 7 and articles 10-14 and the provisions in the Annexes of Anukret 370.
- 5.1.8 The FCA shall establish procedures and work instructions to support the GDCE in conducting official control of imported fishery products in as provided for in chapter 5.2-5.4 below and under general provisions for official control as provided for in sections 4.1.1.1 and 4.1.3.2.

<sup>16</sup> Inter-ministerial Prakas No. 574 PK, dated 25 June 2019 on Collaboration between General Department of Customs and General Department of Cambodian Control of Exported and Imported Goods and Fraud Suppression (CamCONTROL), releasing CamCONTROL from responsibility in this regard.

## 5.2 Procedures for Import Intended for Domestic Market – Recommendations from Fisheries Administration<sup>17</sup>

- 5.2.1 The FCA for food safety of fisheries products shall establish and implement documented procedures and work-instructions to verify the food safety of imported fishery products as per agreement with the GDCE as per requirements in chapter 5.1 above.
- 5.2.2 The verification according to point 1 shall be planned and conducted based on food safety risks and may include, but not be limited to one or more of the following controls:
- Document check prior to import, specifically verification of Health Certificate from the competent authority in the country of origin.
  - Document check, identity check and physical check upon arrival to Cambodia.
  - Sampling and testing for compliance with Cambodian food safety criteria.
- 5.2.3 The Health Certificate mentioned in point 2 shall include information about:
- Company Name and address of Exporter, Importer and Producer
  - Description of product
  - Origin of the raw material (aquaculture/wild caught)
  - Weight (Net/Gross)
  - Scientific Name of species in the consignment
  - Temperature required during storage and transport
  - Unique ID number of the company processing the products, by the responsible competent authority for food safety in the country of processing.
  - Statement by the competent authority, that the product is produced in an establishment that comply with food safety regulations of that country and that product it is fit for human consumption.
- 5.2.4 The FCA shall recommend import only if the document check of the Health Certificate mentioned in point 3 satisfy that the product is safe according to Cambodian food safety requirements.
- 5.2.5 In case where imported fishery products are imported for further processing intended for export, the FCA shall assure that the imported products comply with relevant criteria on the market which is intended for. This may include assurances by the exporting country competent authority and/or or sampling and testing.
- 5.2.6 The document check, identity check and the physical check at arrival to the border inspection point in Cambodia shall be conducted in cooperation and coordination with the GDCE<sup>18</sup>.
- 5.2.7 The document check at the arrival as mentioned in point 5 shall always be carried out, and it shall verify that the information on the Health Certificate accompanying the consignment is equivalent to the information received for desk verification.
- 5.2.8 The verification of identity as mentioned in point 5 shall include:
- Inspection of labels on the arrived products, where information shall match information on accompanied documentation and documentation received prior to arrival.
  - Physical inspection of content in packages where the species and type of product shall match information on label.
- 5.2.9 The physical check mentioned in point 7 shall be planned and conducted considering the food safety risk related with the product and may include sampling and testing for

<sup>17</sup> This chapter to be reviewed based on new Fisheries Law and will be valid only on basis of the new Fisheries law.

<sup>18</sup> Prakas No. 1447 MEF dated 26 December 2007, Ministry of Economy and Finance, on Provisions and Procedures on Customs Declaration, and Instruction NO.1308 GDCE dated 24 November 2009 on Detail Procedures and Responsibilities in Functioning Customs Declaration (Single Administrative Documents-SAD) through electronic mean.

compliance with organoleptic, chemical and microbial quality and food safety criteria as follow:

- a. One of each ten consignments from the same supplier if it is raw, low risk products for cooking before consumption (routine schedule).
- b. One of each two consignments from the same supplier if it is high risk products ready to eat (cooked products, histamine sensitive species, cooked dried shellfish) (routine schedule).
- c. Samples from ten consecutive consignments from the same supplier if results of previous sampling and testing from that supplier showed non-compliant results (sampling on suspicion).

5.2.10 Consignments that do not comply with criteria for document check and identity check as mentioned in points 6, 7 and 8 shall be detained as per procedures of the GDCE until decided if the consignment may be allowed to enter Cambodia.

5.2.11 Consignments from where samples have been taken for organoleptic, chemical and physical test according to point 8 shall be handled as follow:

- a. If the sample was taken according routine schedule, the consignment shall be released after the sampling, and further distribution do not need to wait for test result.
- b. If the sample was taken on suspicion, the consignment shall be held in detention until the result of the testing is available.
- c. If test results from a routine sampling show that the consignment does not comply with requirements, the consignment shall be re-called from the market.
- d. If the test result from a sample taken on suspicion show that the consignment does not comply with requirements, the consignment shall be rejected for entrance in Cambodia.

5.2.12 The FCA shall inform the Competent Authority of the country of origin in cases where a consignment is rejected due to the non-compliance with document, identity or physical controls at the border entrance. Databases available specifically for this purpose, e.g. the ASEAN RASFF and the EU Rapid Alert systems shall be used for this.

### 5.3 Additional Requirements for Import of Fish or Fishery Products Intended for Processing and Re-export

Consignments imported intended for processing and export to markets that require specific Approval by the FCA (See chapter 4.2.2.4), shall come from facilities that are approved or listed for export to that market by the competent authority of the country of origin. The business operator shall keep traceability documentation on supplier, amount and type of material imported and type of product produced from that amount.

### 5.4 Additional Requirements for Import of Aquaculture Products

In case of aquaculture products meant for human consumption, the Health Certificate, as mentioned in chapter 5.3 point 2, shall be accompanied by a statement from the competent authority of the country of origin, that the consignment complies with Cambodian criteria for residues of veterinary medicines and environmental contaminants.<sup>19</sup>

<sup>19</sup> DG-Decision No. 954 FiA dated 22 March 2024 on Technical Order for the Use of Aquatic Medicinal Products in the Kingdom of Cambodia.

## 5.5 Additional Requirements for Import of Live Fishes

Consignments of live fish intended human consumption shall be imported under the procedures provided in chapter 5.2 and 5.3, however only after control and confirmation by the DAD in cooperation with GDCE that the consignment may be allowed into the country on the basis of compliance with Cambodian aquatic animal health requirements and status.

Consignments of live fish, where transport conditions have obviously resulted in altering the viability of the fish, shall not be allowed import for human consumption. Samples for testing food safety parameters as provided for in chapter 5.2 point 8 may not be taken from live fish.

The FCA and the Aquaculture Division shall establish documented and well-coordinated procedures to license importers, list exporters and conduct the necessary controls in line with the principles and guidelines "Asia Regional Technical Guidelines on Health Management for the Responsible Movement of Live Aquatic Animals" and "Standard Operating Procedures for the Responsible Movement of Live Aquatic Animals for ASEAN" of 2015.

## List of Annexes to Technical Requirements

Annex 1: Health Certificate for Food Safety of Fisheries Products Intended for Export from Cambodia

Annex 2: Requirements to Competencies and Training for Technical Staff for Conducting Official Control of Fisheries Products

Annex 3: Reference Analytical Methods

Annex 4: Sampling and Sampling Plans

Annex 5: Food Safety Criteria

Annex 6: Risk Categorization of Facilities in the Value Chain for Fish Handling and Processing

## Annex 1: Health Certificate for Food Safety of Fisheries Products Intended for Export from Cambodia

### Annex 1.1: Health Certificate for Fishery Products Intended for Export (general form)

**ព្រះរាជាណាចក្រកម្ពុជា**  
**KINGDOM OF CAMBODIA**  
**ជាតិ សាសនា ព្រះមហាក្សត្រ**  
**NATION RELIGION KING**



**រដ្ឋបាលធនធាន**  
**Fisheries Administration**  
**នាយកដ្ឋានបច្ចេកវិទ្យាកែច្នៃ និងគុណភាព**  
**Department of Fisheries Post-Harvest Technologies and Quality Control**  
 No. 186 Preah Norodom Blvd., P. O. Box 582, Phnom Penh, Cambodia  
 Tel/Fax: (855)-23 224 800

## វិញ្ញាបនបត្រសុខភាព HEALTH CERTIFICATE

វិញ្ញាបនបត្រសុខភាពនេះត្រូវបានបញ្ជាក់ក្នុងគោលបំណងនាំចេញសម្រាប់ផលិតផល ផលិតផលផលិតផលដូចខាងក្រោម៖ This health certificate is issued on the export purpose for fish and fishery products as follows:	
ផលិតផលផលិតផល <input type="checkbox"/> Live fishery products	ផលិតផលផលិតផលស្រោចកែច្នៃ <input type="checkbox"/> Fresh and processed fishery products
<b>១. រដ្ឋបាលធនធាន</b> <b>1. Competent Authority ( FISHERIES ADMINISTRATION )</b>	<b>២. លេខសំគាល់វិញ្ញាបនបត្រ</b> <b>2. CERTIFICATE REFERENCE NUMBER</b>
<b>៣. អ្នកផ្ញើ (ឈ្មោះ អាសយដ្ឋាន លេខទូរស័ព្ទ និងអ៊ីម៉ែល)</b> <b>3. CONSIGNER (name, full address with telephone and e-mail)</b> Name : Address : Email : Tel :	<b>៤. អ្នកទទួលបញ្ជី (ឈ្មោះ អាសយដ្ឋាន លេខទូរស័ព្ទ និងអ៊ីម៉ែល)</b> <b>4. CONSIGNEE (name, full address with telephone and e-mail)</b> Name : Address : Email : Tel :
<b>៥. ប្រទេសនាំចេញ</b> <b>5. COUNTRY OF EXPORT</b>	<b>៦. ប្រទេសជានិច្ច</b> <b>6. COUNTRY OF DESTINATION</b>
<b>៧. ច្រកចេញ</b> <b>7. EXIT POINT/S</b>	<b>៨. ច្រកចូល</b> <b>8. ENTRY POINT/S</b>
<b>៩. បរិយាយនៃបរិក្ខេប</b> <b>9. MEANS OF TRANSPORT</b> យន្តការ <input type="checkbox"/> ទាត់ <input type="checkbox"/> រថភ្លើង <input type="checkbox"/> បរិក្ខេបយន្ត <input type="checkbox"/> ផ្សេងទៀត <input type="checkbox"/> Airplane Ship Train Road Vehicle Other	<b>១០. កាលបរិច្ឆេទចេញដំណើរ</b> <b>10. DATE OF DEPARTURE</b>
<b>១១. ភិក្ខុភាពផលិតផល</b> <b>11. IDENTIFICATION OF COMMODITIES</b> ប្រភេទ: ត្រី <input type="checkbox"/> សិប្បីស <input type="checkbox"/> មណ្ឌុកស <input type="checkbox"/> សត្វរុន្តជាតិ <input type="checkbox"/> ផ្សេងទៀត <input type="checkbox"/> Type: Fish Mollusk Amphibian Crustacean Other	<b>១២. សីតុណ្ហភាពរបស់ផលិតផល</b> <b>12. TEMPERATURE OF PRODUCTS</b> បរិយាកាស <input type="checkbox"/> ត្រជាក់ <input type="checkbox"/> បង្កក <input type="checkbox"/> Ambient Chilled Frozen
<b>១៣. ប្រភពនៃផលិតផល</b> <b>13. SOURCE OF PRODUCTS</b> ពិធម្មជាតិ <input type="checkbox"/> ការចិញ្ចឹម <input type="checkbox"/> Wild Culture	<b>១៤. ទីតាំងដើមកំណើត</b> <b>14. PLACE OF ORIGIN</b> Cambodia
<b>១៥. ការពណ៌នាអំពីមុខទំនិញ</b> <b>15. DESCRIPTION OF COMMODITIES</b>	

ល.រ No.	ប្រភេទ Species	ចំនួនកញ្ចប់ No. of packages	ទម្ងន់សរុប Net weight (Kg)	ទម្ងន់សរុប Total weight(Kg)
<b>បរិមាណសរុប TOTAL QUANTITY</b>				
១៦. ប្រភេទនៃការដេញដូរ 16. TYPE OF PACKAGING	១៧. ចំនួនសរុបនៃកញ្ចប់ 17. TOTAL NUMBER OF PACKAGES	១៨. លេខកុងតឺន័រ 18. CONTAINER NUMBER (S)		១៩. លេខតែប 19. SEAL NUMBER (S)
២០. ទំនិញនេះត្រូវបានចេញវិញ្ញាបនបត្រសម្រាប់ 20. COMMODITIES CERTIFIED FOR				
អាហាររបស់មនុស្ស <input type="checkbox"/>	រាវីសត្វល្អិត <input type="checkbox"/>	ការស្រាវជ្រាវ និង/ឬ ការស៊ើបអង្កេត <input type="checkbox"/>	ផ្សេងទៀត <input type="checkbox"/>	
Human consumption      Ornamental aquatic animal      Research and/or investigation      Others				
២១. ការបញ្ជាក់ពីរដ្ឋបាលជលផល 21. ATTESTATION BY THE COMPETENT AUTHORITY ( FISHERIES ADMINISTRATION)				
The Undersigned Competent Authority of Fisheries Administration of Cambodia certifies that the above mentioned products were from the registered aquaculture farms, and processed by the registered enterprise in complying with sanitary conditions under inspected by the Competent Authority, and the products were not found any pathogenic microorganism, harmful substances and foreign substances to confirm safe for human consumption.				
២២. សុពលភាពរបស់វិញ្ញាបនបត្រ 22. VALIDATION OF THE CERTIFICATE				
This certificate is permitted for one transportation permit only from the date of sign until 26 <sup>th</sup> March, 2024				
២៣. ចេញដោយរដ្ឋបាលជលផល 23. ISSUED BY THE COMPETENT AUTHORITY ( FISHERIES ADMINISTRATION)				
បញ្ជាក់ដោយភ្នាក់ងារត្រួតពិនិត្យរដ្ឋការ CERTIFIED BY OFFICIAL INSPECTOR				
ប្រធាននាយកដ្ឋានបច្ចេកវិទ្យាពិទ្ធិនិងគុណភាព Director of the Department of Fisheries Post-Harvest Technologies and Quality Control (Head of Safety and Quality Control)		ភ្នំពេញ, ថ្ងៃទី ..... ខែ ..... ឆ្នាំ ..... Phnom Penh, Day:..... Month: ..... Year 2024		
		ត្រូវបានឃើញនិងឯកភាពដោយប្រធានរដ្ឋបាលជលផល SEEN AND APPROVED BY THE HEAD OF THE CENTRAL FISHERIES ADMINISTRATION		
ប្រតិភូរាជរដ្ឋាភិបាល ទទួលបន្ទុកជា ប្រធានរដ្ឋបាលជលផល Delegate of the Royal Government, Director General of Fisheries Administration (Head of Central Fisheries Administration)		ភ្នំពេញ, ថ្ងៃទី ..... ខែ ..... ឆ្នាំ ..... Phnom Penh, Day:..... Month: ..... Year 2024		
		ប្រតិភូរាជរដ្ឋាភិបាល ទទួលបន្ទុកជា ប្រធានរដ្ឋបាលជលផល Delegate of the Royal Government, Director General of Fisheries Administration (Head of Central Fisheries Administration)		

## Annex 1.2: Health Certificate for Fishery Products Intended for Export to China

For the format of health certificates for fish and fishery products exported to China, there are different requirements depending on the products (aquaculture, wild, live fish, crocodiles, and ornamental fish).

**柬埔寨王国**  
**KINGDOM OF CAMBODIA**  
**民族 宗教 国王**  
**NATION RELIGION KING**



**渔业局**  
 Fisheries Administration  
**渔业技术和质量控制部**  
 Department of Fisheries Post-Harvest Technologies and Quality Control  
 No. 186 Preah Norodom Blvd, Phnom Penh, Cambodia. P. O. Box 582

### 柬埔寨王国向中华人民共和国出口水产品卫生证书

## HEALTH CERTIFICATE

For fish and fishery products intended to export from Cambodia to the People's Republic of China

<b>1. 出证部门 DEPARTMENT OF CERTIFICATE ISSUANCE</b>		<b>2. 证书编号 CERTIFICATE REFERENCE NUMBER</b>	
<b>3. 托运人 (姓名, 地址, 电话号码, 电子邮箱)</b> <i>CONSIGNOR (name, full address with telephone and email)</i>		<b>4. 收货人 (姓名, 地址, 电话号码, 电子邮箱)</b> <i>CONSIGNEE (name, full address with telephone and email)</i>	
Name : Address : Email : Tel :		Name : Address : Email : Tel :	
<b>5. 发货地 PLACE OF DISPATCH</b>		<b>6. 目的地 PLACE OF DESTINATION</b>	
<b>7. 运输工具信息 TRANSPORT INFORMATION</b>			
运输方式 Means of Transportation:		<input type="checkbox"/> 空运 Airplane <input type="checkbox"/> 海运 Ship <input type="checkbox"/> 火车 Train <input type="checkbox"/> 陆运 Road Vehicle <input type="checkbox"/> 其他 Other: .....	
船只名称 Name of Vessel:			
航班号 Flight Number:			
其他运输工具信息 Information of Other Transport Means:			
<b>8. 原料原产国 COUNTRY OF ORIGIN OF RAW MATERIALS</b>		<b>9. 出发日期 DATE OF DEPARTURE</b>	
Cambodia		14/September/2023	
<b>10. 商品识别 IDENTIFICATION OF COMMODITIES</b>		<b>11. 产品温度 TEMPERATURE OF PRODUCTS</b>	
公类: 鱼 <input type="checkbox"/> 软体动物 <input type="checkbox"/> 两栖类 <input type="checkbox"/> 甲壳类 <input type="checkbox"/> 其他 <input type="checkbox"/> Type: Fish Mollusk Amphibian Crustacean Other		常温 <input type="checkbox"/> 冷藏 <input type="checkbox"/> 冷冻 <input type="checkbox"/> Ambient Chilled Frozen	
<b>12. 产品来源 SOURCE OF PRODUCTS</b>		<b>13. 生产水域性质 TYPES OF PRODUCTS WATER AREA</b>	
野生 <input type="checkbox"/> 养殖 <input type="checkbox"/> Wild Aquaculture		淡水 <input type="checkbox"/> 海水 <input type="checkbox"/> Freshwater Sea water	
<b>14. 养殖区域 AQUACULTURE AREA</b>		<b>15. 捕捞区域 CATCH AREA</b>	
<b>16. 加工方式 PROCESSING TYPE</b>		<b>17. 生产方式 PRODUCTION MODE</b>	

18. 产品说明 DESCRIPTION OF COMMODITIES					
编号 No.	商品名称 Commercial name	学名 Species/Scientific name	包装数量 # of Packages	净量 Net weight	总重量 Total weight
包装类型 TYPE OF PACKAGING		生产批号 Lot No. of Products	生产日期 Production Date		
19. 总数量 TOTAL		20. 集装箱号 CONTAINER NUMBER (S)	21. 封条码 SEAL NUMBER (S)		
22. 企业信息 INFORMATION OF THE ESTABLISHMENTS					
养殖场名称和原料原产国官方批准的注册号 Aquaculture farm name and registration number approved by the country of origin of raw materials:					
捕捞渔船船名、注册编号和船籍 Name of fishing vessel, registration number and flag of the vessel:					
捕捞加工渔船船名、注册编号和船籍 Name of fishing and factory vessel, registration number and flag of the vessel:					
运输渔船船名、注册编号和船籍 Name of Transport Fishing Vessel, Registration number and Flag of the Vessel:					
加工厂厂名和注册编号 Name of processing plant & Registration number of the plant:					
原料存放独立冷库名称、注册编号和所属国 Name of Independent cold storage for raw materials, Registration number and host country of the Storage:					
成品存放独立冷库名称、注册编号和所属国 Name of Independent cold storage for products, registration number and host country of the storage:					
23. 渔业局健康声明 ATTESTATION BY THE COMPETENT AUTHORITY					
<p>兹证明: This is to certify that:</p> <p>1. 该产品在主管当局推荐在华注册的捕捞渔船、运输渔船、捕捞加工渔船、独立冷库和加工企业捕捞、加工、包装、储存和运输。The products are fished, processed, packaged, stored and transported in fishing vessels, transport fishing vessels, fishing and factory vessels, independent cold storages and processing plants, which are registered in China recommended by the Competent Authority.</p> <p>2. 该产品在卫生条件下生产、包装、储藏和运输, 并置于主管当局监督之下。The products were produced, packed, stored, and transported under sanitary condition, which were under the supervision of competent authority.</p> <p>3. 该产品经主管当局检验检疫, 未发现中国规定的致病微生物、有毒有害物质和异物, 及中国和世界动物卫生组织(OIE) 所列的疫病。The products were inspected and quarantined by competent authority and not found any diseases, pathogenic microorganism, harmful substances and foreign substances regulated in the P.R.China and the diseases listed by China and OIE.</p> <p>4. 该产品符合兽医卫生要求, 适合人类食用。The products meet veterinary sanitary requirements and are fit for human consumption.</p> <p>5. 证书中所载的养殖场、加工厂、捕捞渔船、捕捞加工渔船、运输船、独立冷库均能按照联合国粮农组织和世界卫生组织制定发布的有关新冠肺炎与食品安全指南, 建立有效的食品安全管理体系, 做好各项防控措施, 确保输华产品未被新冠病毒污染。The aquaculture farm, processing plant, fish vessel, fish and factory vessel, transport vessel and independent cold storage in the certificate have established effective food safety management system according to the COVID-19 and food safety guidance issued by FAO and WHO, and enact all kinds of protective measures to ensure that the products are not polluted by the Covid-19 virus.</p>					
24. 证书有效期 VALIDATION OF THE CERTIFICATE					
<p>该证书仅可用于单次运输许可, 从签署之日起至-----</p> <p>This certificate is permitted for one transportation permit only from the date of sign until-----</p>					
25. 由渔业局颁发 ISSUED BY THE COMPETENT AUTHORITY (FISHERIES ADMINISTRATION)					

<b>經官方檢驗員認證</b> <b>CERTIFIED BY OFFICIAL INSPECTOR</b>	
漁業技術和質量控制司可長 Director of the Department of Fisheries Post-Harvest Technologies and Quality Control ..... (Head of Safety and Quality Control)	金邊市, 20...年 ... 月 ... 日 Phnom Penh, Day:..... Month: ..... Year 20....
<b>漁業局局長批准</b> <b>SEEN AND APPROVED BY THE HEAD OF THE CENTRAL FISHERIES ADMINISTRATION</b>	
柬埔寨王國政府代表 漁業局局長 Delegate of the Royal Government, Director General of Fisheries Administration ..... (Head of Central Fisheries Administration)	金邊市, 20 年 ... 月 ... 日 Phnom Penh, Day:..... Month: ..... Year 20....
編寫說明 Introduction for filling: 1. 生產國是指產品完成最後一級外銷包裝工序的所在國。 Country of production is referred to the country where the last outer packing procedure of the product was completed. 2. 加工方式是指冰凍、冷凍、干燥、蒸餾、熏制、罐裝等。 Processing type is referred to Chilled, Frozen, Dried, Salted, Smoked, Canned. 3. 輸出國主管部門應完整填寫從捕撈、加工、包裝、存儲、運輸和出口等全過程中涉及的所有原料產國、產品生產國和證書簽發國的企业信息, 包括養殖場、船隻船艙 (仅限具有冷凍或冷藏功能的船隻船艙)、船隻加工船艙、運輸船艙、加工廠和獨立冷庫的名称和注冊號, 不得遺漏上述任何环节中涉及的企业信息。 The competent authority of the exporting country fill in the establishments information of country of origin of raw material, country of production and country of certificates involved in the whole process of fishing, processing, packaging, storage, transportation and export, including the names and registration numbers of aquaculture farm, fishing vessels (only for the fishing vessels with freezing or refrigeration function), fishing and factory vessels, transport fishing vessels, processing plants and independent cold storage. The establishments information involved in any of the above links shall not be omitted. 4. 此證書內容不適用部分以 N/A 填寫。 If any of the information required is not applicable, then the blank area must be filled with N/A.	

### **Annex 1.3: Health Certificate for Fishery Products Intended for Export to EU**

Regulation (EU) 2020/2235, Annex 3, chapter 28

FISH-CRUST-HC Chapter 28: Model animal health/official certificate for the entry into the Union of live fish, live crustaceans and products of animal origin from those animals intended for human consumption

[https://publications.europa.eu/resource/cellar/707075fe-ca8a-11ee-95d9-01aa75ed71a1.0006.02/DOC\\_1](https://publications.europa.eu/resource/cellar/707075fe-ca8a-11ee-95d9-01aa75ed71a1.0006.02/DOC_1)

## Annex 2: Requirements to Competencies and Training for Technical Staff for Conducting Official Control of Fisheries Products

1. Technical staff of the Competent Authority shall have adequate educational level and technical training to ensure that they can carry out their tasks with an appropriate level of technical competence.
2. Food safety inspection is a multidisciplinary activity, that will combine elements of the following disciplines, and inspectors should be able to work within a multidisciplinary framework.
3. Basic qualifications of inspectors shall be in one of the following fields:
  - Fisheries science
  - Food science and technology
  - Food chemistry and engineering
  - Agroindustry
  - Veterinary science
  - Molecular cell biology
  - Public health
  - Food microbiology
4. The inspectors shall also have a detailed knowledge of the content of the national legislation. Particular attention should be paid to:
  - Legal status of the inspector as a representative of the Competent Authority
  - Procedures laid out for approval of establishments and other fishery business operations in the first instance, approval, renewal of approval and withdrawal of approval
  - Procedures laid out for health certification of products
  - Powers of inspectors (entry, seizure of unfit products, sampling)
  - Responsibilities of inspectors (commercial confidentiality)
  - Technical food safety conditions to be complied with in relation to fishery products
  - Definitions to be applied in the course of controls for health conditions
  - Effective communication and reporting systems
5. All inspectors shall be provided with additional training in the areas of:
  - Fish biology, taxonomy, identification and composition
  - Fish spoilage mechanisms and freshness evaluation
  - Bio-toxicology of fishes
  - Aquaculture and fishing technologies
  - Commonly used fish processing technologies
  - Specific hazards related to fish in general and certain species and preparations
  - EU legislation applicable to products and related controls required for import to EU.
  - Official control methods and techniques including the assessment of non-compliances, enforcement measures and follow up
  - Food safety risk analysis with special reference to the risks and hazards in the production, processing and distribution of fish and fishery products
  - Development and assessment of internal control system based on HACCP principles
  - Quality assurance programs and their assessment
  - Official certification systems
  - Any other topic necessary to ensure that official controls are performed in accordance with current legislation

### Annex 3: Reference Analytical Methods

Some major markets required specific analytical methods or their equivalent methods. In such cases the required analytical methods shall be applied. In cases with not specific requirements, the analytical methods in Table 1 below shall be applied.

Table 1. Laboratory analyses for fish and fishery products from official sampling

Category of analysis	Type of analysis	Recommended method
<b>Sensory analyses</b>	Freshness of finfish	Codex Guidelines CAC-GL 31-1999
	Freshness of crustaceans	Codex Guidelines CAC-GL 31-1999
	Freshness of cephalopods	Codex Guidelines CAC-GL 31-1999
	Check for visible parasites	Internal instruction based on EU Regulation (EC) 2074/2005
<b>Chemical analyses</b>	TVB, TMA, DMA	Codex Alimentarius/Conway's method
	Histamine	Codex method (AOAC 977.13) or EU method (HPLC-UV)
	Sulfur dioxide (SO <sub>2</sub> )	BS EN 1988-1:1998
	Salt content	AOAC method or Brix meter
	Heavy metals (Hg, Pb, Cd)	(Cd and Pb) BS EN 14 084:2003 Hg (BS EN 13806:2002)
	Pesticides	Validated methods with adequate performance criteria compare to accepted maximum limit.
	Veterinary drugs	Validated methods with adequate performance criteria compare to accepted maximum limit.
<b>Microbiological analyses</b>	Total Plate Count (TPC)	(22°C or 36°C) EN ISO 6222 ; (30°C) EN ISO 4833
	Total coliforms, Fecal coliforms, <i>E. coli</i>	EN ISO 9308
	<i>Salmonella/Shigella</i>	EN ISO 6579:2002 + Amend 1:2007
	Coagulase + <i>S. aureus</i>	ISO 68881:1999/Amend. 1:2003
	<i>Vibrio parahaemolyticus</i>	(ISO/TS 21872-1:2007)
	<i>Listeria monocytogenes</i>	ISO 11290-1:1996/Amend.1:2004
	<i>Vibrio Cholerae</i>	(ISO/TS 21872-1:2007)

Note: Testing of fishery products intended for export, for the purpose of official control, may also use international recommended standards or methods, e.g. ISO, AOAC, FDA-BAM, APHA, NMKL-NorVal International.

## Annex 4: Sampling and Sampling Plans

### 1. General Requirements to Business Operators and FCA

The business operators as well as the FCA shall carry out sampling and testing to verify that the HACCP based systems are effective to control identified food safety hazards. The sampling frequencies and test parameters shall be defined within the business operators HACCP systems and within the FCA Technical Procedures and the respective related work instructions.

It is the responsibility of each part determine the frequency of the samplings for efficient verification and documentation of food safety.

The FCA and business operators shall keep the results of sampling and testing in formats that allow easy trend analysis and information gathered and this shall be included in the risk assessment when determining frequency of sampling for different parameters.

Results of the business operators sampling and testing shall be available for FCA officials at audit an inspection of the HACCP systems.

### 2. Test Methods and Sampling - FCA

Procedures for sampling and testing, to be conducted for the purpose of official control of food safety of fishery products, as foreseen in sections 4.1.3.3, 4.3.2.5, 4.3.5 and 4.6.1.5 of these Technical Requirements, shall be documented in quality management systems of the FCA and the laboratories or other control bodies, to which such responsibility is delegated. FCA shall have procedures and where necessary, related work instructions including, but not be limited to:

#### *Test Methods*

- Reference to the test method used
- Performance criteria for the test method used as applicable (detection limit, accuracy, limit of quantification etc.)
- Matrix for which the test method applies/has been validated
- Sample preparation
- Detailed technical test procedure including calculation and presentation of the result

#### *Sampling*

- Identification of the lot sampled from and the size of the lot (a day's production, the products produced from on batch of raw material, a consignment ready for export etc.).
- Special precautions to be taken to avoid any changes of the substance to be tested for (e.g. sterility, cleanliness or migration of substances from the containers to be used for the sample).
- Number and size of incremental and aggregate samples where relevant
- Containers to be used for the sample, including sealing of the container
- Ensuring of samples to be kept for references
- Principles for systematic labelling of samples and record keeping of the sampling process which ensure that samples may not be mixed up.
- Conditions for sample storage, transport and delivery to the laboratory (time and temperature)
- Sampling plans as adequate for the type of product, size of the consignment and lots/ sublots and the purpose of the sampling and testing.

### 3. Test Methods and Sampling - Business Operators

Business operators shall have procedures and related work instructions for verification by sampling and testing documented under the HACCP system. The documentation shall include at least the elements described in chapter 2 above and information about the laboratory services relied on.

The business operator shall select a laboratory that can provide satisfactory information about the test methods as described in section 2 above. Business operators shall require the laboratory to inform, where relevant, whether the method(s) to be applied are equivalent with any specific market criteria.

### 4. Specific Market Requirements – Sampling Plans and Test Methods

Where export markets, for example the EU market, have specific requirements for test methods, sampling methods or sampling plans, such methods shall always be applied for the purpose of official control of consignments intended to be exported to these markets.

If there are no specific market requirements, the principles in relevant international standards, as indicated in section 5 – 7 below shall be applied.

### 5. Sampling Plans for Microbial Testing

When a consignment for export or import is to be tested for compliance with microbial criteria stipulated in Annex 5 of these technical requirements, or with specific market criteria, a two or three attribute sampling plan shall be applied<sup>(Ref. 1)</sup> and the number of samples and acceptance level shall be determined based on the risk as indicated in the Table 1 below, where it is not otherwise defined in Annex 5.

**Table 1: Classification of sampling plans for microbial criteria, including histamine, according to nature of concern and hazard**

Nature of Concern	Decreased hazard	Unchanged hazard	Increased hazard
No direct health hazard (spoilage and shelf-life)	n=5, c=3	n=5, c=2	n=5, c=1
Low indirect health hazard (indicator organism)	n=5, c=3	n=5, c=2	n=5, c=1
Moderate direct health hazard (limited spread)	n=5, c=2	n=5, c=1	n=10, c=1
Moderate direct health hazard of potential extensive spread in food.	n=5, c=0	n=10, c=0	n=20, c=0
Severe direct health hazard.	n=15, c=0	n=30, c=0	n=60, c=0

Examples:

- If Salmonella in a ready to eat products is considered to be “A moderate direct health hazard (limited spread), hence the sampling should be done with n=5 and c=0
- E. coli in raw fish is considered to be of “A low indirect health hazard (Indicator organism) with decreased hazard (because the product will normally be cooked before eating) hence the sampling should be done with n=5 and c=3.
- See definitions of n, c, m and M in section 11 of this Annex

(Ref. 1) CAC/GL 50-2004 chapter 3.2.2 and section 10 in this Annex for definitions.

## 6. Sampling for Control of Net Weight/Drained Weight

When control of net weight/drained weight of lots/consignments ready for export or lots/consignments intended for import the tolerable error for a given net weight/ drained weight as indicated in Table 2 below shall be applied and the number of samples depending of the size of the consignment shall be determined as per Table 3.

Example: If the consignment has 500 master cartons of 10 kg, 81 samples shall be taken (Table 2) and 4 of the samples may have a negative tolerance of up to 150 g (table 3).

**Table 2: Sampling for net weight/drained weight control**

Lot size (units)	Number of samples to be taken	Number of packages allowed with the error in Table 3
20	all	0
40	32	1
60	35	1
80	47	2
100	49	2
200	64	3
300	67	3
400	81	4
500	81	4
600-100000	98	5

Reference: OIML R 87 (2016).

**Table 3: Tolerable negative error of weight/drained weight**

Nominal weight/drained weight (An g)	Tolerable Negative Error (TNE)	
	% of An	g
5 to 50	9	-
50 to 100	-	4,5
100 to 200	4,5	-
200 to 300	-	9
300 to 500	3	-
500 to 1 000	-	15
1 000 to 10 000	1,5	-
10 000 to 15 000		150
Above 15 000	1	

Reference: OIML R 87 (2016)

## 7. Sampling for Control of Environmental Contaminants

- 7.1 Sampling for control of environmental contaminants (heavy metals, dioxin and dioxin like substances) in a lot/consignment intended for export or import shall be based on the following principles.
1. A number of incremental samples shall be taken randomly in the consignment; however, focus may be given to the biggest fish in the consignment.
  2. The incremental samples shall be pooled to one aggregate sample, from where the laboratory sample(s) shall be drawn.
  3. The result of the sampling and testing is the result from the laboratory sample.
    - a) If the result for the bigger fish is below the criteria in Annex 5, the consignment shall be considered compliant.
    - b) If the result for the bigger fish is higher than the criteria in Annex 5, new samples shall be taken from smaller fish. If the result from this testing is below the criteria in Annex 5, the fish of this size and smaller sizes shall be considered compliant while the bigger fish shall be non-compliant and sorted out of the consignment for other purposes.
- 7.2 The number of incremental samples shall be determined depending of the size of the lot.
- a) A lot/consignment or a subplot can consist of only one species of marine fish or freshwater fish.
  - b) A lot/consignment which is more than 15 tonnes shall be divided in sublots of 15-30 tonnes
  - c) The number of incremental samples from a lot or subplot shall be determined as follow

**Table 4: Minimum number of incremental samples to be taken from the lot or subplot**

Weight or volume of lot/sublot (in kg or litre)	Minimum number of incremental samples to be taken
< 50	3
≥ 50 and ≤ 500	5
> 500	10

Reference: EU Regulations (EC) 333/2007 and (EC) 644/2017

If the lot or subplot consists of individual packages or units, then the number of packages or units which shall be taken to form the aggregate sample is given in Table 5.

**Table 5: Number of packages or units (incremental samples) which shall be taken to form the aggregate sample if the lot or subplot consists of individual packages or units**

Number of packages or units in the lot/sublot	Number of packages or units to be taken
≤ 25	at least 1 package or unit
26-100	about 5 %, at least 2 packages or units
> 100	about 5 %, at maximum 10 packages or units

Reference: EU Regulations (EC) 333/2007 and (EC) 644/2017

## 8. Sampling for Control of Residues of Veterinary Medicines

Sampling for control of residues of veterinary medicines in a lot/consignment intended for export or import shall be based on the principles for environmental contaminants as described in section 6 above, however the incremental samples shall include all sizes of the fish in the lot/consignment.

## 9. Hygiene Control of Food Safety Surfaces

Hygiene control of food safety surfaces shall or may be carried out as required in the sections 3.7.1.4 and 4.1.3.3 of this technical requirements and Table 1 of this Annex. The controls shall be carried out with methods described by international standards such as ISO 18593:2018 or other methods where validation proves their efficiency for purpose.

The operator and the FCA shall make work instructions for implementing the method to be used, including at least, but not limited to the instructions for use, surface area to be controlled, the incubation temperature and the criteria for acceptable and not acceptable. Records shall always include details of time and place of the testing.

The routine hygiene control shall as be based on total count; however, it may be made specific for specified pathogenic bacteria (e.g. salmonella, E. coli, Listeria spp.) in cases where causes for specific cases of risk for food safety are to be analysed.

## 10. Special Conditions

If it is not possible to carry out the sampling as set out in this Annex because of unacceptable commercial consequences (e.g. damage to the lot or package forms) or where it is practically impossible to apply the above mentions sampling methods, alternative methods may be applied provided that they are sufficiently representative for the sampled lot or subplot and fully documented.

## 11. Definitions That Apply to This Annex

n	The number of samples to be tested in microbial analysis
m	The lower limit which determines compliance (microbial analysis)
M	The higher limit which may apply in determining compliance (microbial analysis)
c	Is the number of samples that are permitted to have results above <b>m</b> (single limit) or between <b>m</b> and <b>M</b> if the two are different
Two attribute sampling plan	If only one limit <b>m</b> applies to the product, or if <b>m = M</b> .
Three attribute sampling plan	If two limits <b>m</b> and <b>M</b> applies to the product and if <b>m &lt; M</b>
Lot:	An identifiable quantity of food delivered at one time and determined to have common characteristics, (such as origin, variety, type of packing, packer, consignor or markings). The size of fish shall be comparable.
Sublot:	Designated part of a large lot in order to apply the sampling method on that designated part. Each subplot must be physically separated and identifiable.
Incremental sample:	A quantity of material taken from a single place in the lot or subplot
Aggregate sample:	The combined total of all the incremental samples taken from the lot or subplot; aggregate samples shall be considered as representative of the lots or sublots from which they are taken
Laboratory sample:	A sample intended for the laboratory

## Annex 5: Food Safety Criteria

### 1. Chemical Criteria and Additives

The food safety criteria in the tables below shall apply for fishery products imported to Cambodia and for fishery exported from Cambodia, if no other criteria are specified by the customer or by the legislation of the country of destination.

Guidelines on specific market criteria can be found on DFPTQ of FCA website

Parameter		Products	Maximum Level
<b>Residues of veterinary medicines</b>	Prohibited veterinary medicines and veterinary medicines allowed with an MRL	All fish and fishery products originating from aquaculture	As provided for in DG-Decision No. 955 FiA dated 22 March 2024 on Technical Order for the Use of Aquatic Medicinal Products in the Kingdom of Cambodia
	Sulphites <sup>1)</sup>	Fresh and frozen, uncooked fish and fishery products	100 ppm
		<ul style="list-style-type: none"> <li>Frozen, cooked crustaceans</li> <li>Other fishery products, fully preserved (canned or fermented).</li> </ul>	150 ppm
		<ul style="list-style-type: none"> <li>Smoked, dried, fermented, and/or salted fish and fish products</li> </ul>	30 ppm
	Phosphates <sup>1)</sup>	<ul style="list-style-type: none"> <li>Frozen fish, fish fillets, and fishery products</li> <li>Frozen battered fish, fish fillets, and fishery products.</li> <li>Frozen minced and creamed fishery products.</li> <li>Smoked, dried, fermented, and/or salted fish and fishery products.</li> <li>Fish and fishery products, marinated and/or in jelly, pickled and or in brine</li> <li>Salmon substitutes, caviar, and other fish roe products</li> <li>Semi-preserved fish and fishery products, (e.g. fish paste)</li> <li>Fully preserved, including canned or fermented fish and fishery products</li> <li>Cooked fish and fishery products 2000</li> </ul> <p>Note: This criterion applies also to products of bivalve molluscs, echinoderms, tunicates, gastropods.</p>	2200 ppm

	Sorbates <sup>1)</sup>	<ul style="list-style-type: none"> <li>Smoked, dried, fermented, and/or salted fish and fishery products</li> <li>Semi-preserved fish and fish products</li> </ul> <p>Note: This criterion applies also to products of bivalve molluscs, echinoderms, tunicates, gastropods.</p>	1000 ppm
		<ul style="list-style-type: none"> <li>Cooked fish and fishery products</li> </ul> <p>Note: This criterion applies also to products of bivalve molluscs, echinoderms, tunicates, gastropods.</p>	2000 ppm
	Benzoates <sup>1)</sup>	<ul style="list-style-type: none"> <li>Cooked crustaceans (including mollusks and echinoderms)</li> <li>Semi-preserved fish and fishery products</li> </ul>	2000 ppm
		<ul style="list-style-type: none"> <li>Smoked, dried, fermented, and/or salted fish and fish products.</li> </ul> <p>Note: This criterion applies also to products of bivalve molluscs, echinoderms, tunicates, gastropods</p>	200 ppm
Other food additives	Fishery Products in product groups 9.1-9.4 in CODEX STAN 192-1995 as amended 2023.	As provided for in Codex Alimentarius CODEX STAN 192-1995 as amended 2018.	
<b>Contaminants</b>	Cadmium <sup>2)</sup>	<ul style="list-style-type: none"> <li>Marine bivalve mollusks</li> <li>Cephalopods without viscera</li> </ul>	
	Lead <sup>2)</sup>	Fish	0,3 ppm
		<ul style="list-style-type: none"> <li>Marine bivalve mollusks,</li> <li>Cephalopods without viscera</li> </ul>	2,0 ppm
	Methyl Mercury <sup>2) and 3)</sup>	<ul style="list-style-type: none"> <li>Marine bivalve mollusks,</li> <li>Cephalopods without viscera</li> <li>Seafood mix (different fishery products in same unit)</li> <li>Surimi based fishery products</li> </ul>	0,5 ppm
		Tuna, whole commodity excl. viscera	1,2 ppm
Alfonsino, whole commodity excl. viscera		1,5 ppm	
Marlin, whole commodity excl. viscera		1,7 ppm	
Shark, whole commodity excl. viscera		1,6 ppm	
Tin <sup>2)</sup>	Canned food	250 ppm	
<b>Other Food Safety Criteria</b>	Histamine	Histamine poisoning fish; Tuna, Mackerel, Sardine, Saba, etc.	100 ppm
		Fish Sauce Fermented fish	400ppm 200 ppm

**Notes:**

- <sup>1)</sup> As specified in CODEX STAN 192-1995 as amended 2023
- <sup>2)</sup> Codex Alimentarius CSX 193-1995 as amended 2022
- <sup>3)</sup> If the total mercury concentration is below or equal to the ML for methylmercury, no further testing is required and the sample is determined to be compliant with the ML. If the total mercury concentration is above the ML for methylmercury, follow-up testing shall be conducted to determine if the methylmercury concentration is above the ML.

**Microbiological Criteria for Fresh and Frozen Fish & Fishery Products Intended for Export**

Product group	Parameter	<i>n</i>	<i>c</i>	<i>m</i>	<i>M</i>
Raw Fish, crustaceans and molluscs, fresh or frozen: (to be prepared and cooked before consumption)	<i>E. coli</i> ; MPN/g	5	3	10	500 <sup>a)</sup>
	<i>Staphylococcus aureus</i> , CFU/g	5	2	10 <sup>3</sup>	10 <sup>4</sup>
	<i>Salmonella</i> spp.; /25g	5	0	ND	
Prepared fish and fishery products; frozen, ready to cook (to be cooked before consumption; e.g. breaded fish)	TPC; CFU/g	5	2	10 <sup>5</sup>	10 <sup>7</sup>
	<i>E. coli</i> ; MPN/g	5	2	10	500
	<i>Staphylococcus aureus</i> , CFU/g	5	1	10 <sup>3</sup>	10 <sup>4</sup>
	<i>Salmonella</i> spp., /25g	5	0	ND	
Cooked fish and fishery products, frozen, ready to eat (eg. Fish balls).	TPC; CFU/g	5	2	10 <sup>4</sup>	10 <sup>5</sup>
	<i>E. coli</i> ; MPN/g	5	0	<3	
	<i>Staphylococcus aureus</i> , CFU/g	5	2	10 <sup>2</sup>	10 <sup>3</sup>
	<i>Vibrio parahaemolyticus</i> , CFU/g	5	1	10 <sup>2</sup>	10 <sup>3</sup>
	<i>Salmonella</i> spp.; /25g	5	0	ND	
	<i>L. monocytogenes</i> ; /25g	5	0	ND	

ND means shall not be detected

**References:**

- 1) ICMSF, MICROORGANISMS IN FOODS 2 Sampling for microbiological analysis: Principles and specific applications 1986, 2. Ed.; Chapter 17 (modified)
- 2) CAC/GL 50-2004 chapter 3.2.2
  - a) Example: Take 5 samples, up to 3 of the samples may be between 10 and 500 MPN/g and other at least 2 samples  $\geq 10$ MPN/g. The Result is compliant only when both criteria are complied with.

**Microbiological Criteria for Traditional Fishery Products Intended for Export and Domestic Market**

Product	TPC; CFU/g	Yeast & Mould; CFU/g	Staphylococcus, Aureus; CFU/g	Vibrio cholera; /25g	Clostridium Perfringens /0.1g	Salmonella spp. /25g	E-coli MPN/g	Listeria	Coliform
Dried shrimp (CS106:2015)	< 100,000	<500	<100	NT	<100	ND	<3		
Dried fish (sweet) (CS167:2025)	<10,000	<1,000	ND	NT	NT	ND	ND	ND	
Salted dried fish product (CS167:2025)	<10,000	<1,000	ND	NT	NT	ND	ND	ND	
Fish ball (CS198:2015)	< 100,000	NT	≤100	NT	≤100	ND	<3		≤10
Fermented fish (Prahok) (CS522:2015)	<10,000	<50	ND	NT	ND	ND	ND	ND	

ND means shall not be detected

NT means shall not be tested (no criteria apply)

CS means Cambodian Standard

## Annex 6: Risk Categorization of Facilities in the Value Chain for Fish Handling and Processing

FCA shall perform official controls regularly at frequencies based on risk. The risk categorization shall be evidence-based and allow a competent authority to make and document risk management decisions.

The risk categorization involves consideration of two aspects:

- Product characteristics based on (a) aquatic animal species involved (b) location of the activities or operations (c) activities and processes performed by the operators (d) materials used in operations that may influence food safety, integrity or wholesomeness (e) intended use of the product. Examples are indicated in Table 1.
- Process control characteristics such as controls implemented by the operators along the food chain from primary production to consumption. This could include information on internal audits, third party audits and outcome of official controls performed previously. Examples are indicated in Table 1.
- Outcome of official controls/status of compliance, see Table 3.

**Table 1. Matrix for combining information from product risk and internal process controls**

Product	Process control status				
	No GHP, GMP	GHP but no internal audit	GHP, GMP internal audit	GHP, GMP, internal and external audit	GHP, GMP, HACCP, internal and external audit
Raw fish, live and raw bivalve molluscs, molluscs like clams, oysters, mussels in shell or shucked consumed without cooking	High risk	High risk	Moderate risk	Moderate risk	Low risk
Lightly preserved fish eg with NaCl <6%, pH >5. Includes marinated, cold smoked fish consumed without cooking	High risk	High risk	Moderate risk	Moderate risk	Low risk
Products from histamine producing fish raw fish to be cooked before eating, heat sterilized products, products preserved with salt and acid NaCl <6%, pH >5	High risk	Moderate risk <sup>*</sup> )	Moderate risk <sup>*</sup> )	Low risk <sup>*</sup> )	Low risk <sup>*</sup> )

Semi-preserved fish with NaCl >6%, pH <5, with preservatives like benzoate Eg salted and marinated fish, fish sauce, some of the fermented fish (Prahok)	Moderate risk	Moderate risk	Moderate risk	Low risk	Low risk
Frozen cooked fishery products, dried fish, salted fish, hot smoked fish, eaten after cooking	Moderate risk	Moderate risk	Moderate risk	Low risk	Low risk
Fish sauce NaCl ≥20%, Fermented fish (Prahok)	Moderate risk	Moderate risk	Low risk	Low risk	Low risk
Non-histamine forming wild caught fish or fishery products fresh or frozen eaten after cooking	Moderate risk	Low risk	Low risk	Low risk	Low risk
Non-histamine forming fish or fishery products from aquaculture, included in NRMP, fresh or frozen to be cooked before eating .	Moderate risk	Moderate risk	Low risk	Low risk	Low risk

\*) For histamine producing species and related products the risk classification applies only if the GMP includes traceability to the raw material supply with documentation for adequate time-temperature in the handling. If this is not the case the risk classification should always be "High".

**Table 2: Categorization of inspection findings**

Minor (m) defects	Major (M) defects	Critical (C) defects.
<ul style="list-style-type: none"> <li>Non-compliances do not impact on food safety or</li> <li>The risk to food safety is of low magnitude and can be rectified and contained easily.</li> </ul>	Non-compliance which are of such a nature that if it is persists (i.e., is not rectified), it will or is likely to pose a risk to public health.	Non-compliance which are of such a nature that there is a serious and immediate risk public health.  Certain non-compliance e.g. illegal activities or serious fraudulent practices should be also considered as critical.

**Table3: Determining of inspection frequencies based on risk allocation of the establishment and inspection findings**

<b>Establishment Rating</b>	<b>Minor m</b>	<b>Major M</b>	<b>Critical C</b>	<b>Low Risk</b>	<b>Medium Risk</b>	<b>High Risk</b>
<b>Level 1 Satisfactory</b>	0	0	0	1/year	2/year	3/year
<b>Level 2 Satisfactory, Minor non-compliance</b>	1- ≤9	0	0	1/year	2/year	3/year
<b>Level 3 Unsatisfactory</b>	≥10 <sup>*)</sup>	0	0	1/year	2/year	3/year
<b>Level 4 Unsatisfactory, Serious****)</b>		1- ≤5 <sup>**)</sup>	1 or more	2/year	3/4	4/year
<b>Level 5****) Unsatisfactory Critical</b>		>5 <sup>***)</sup>	≥ 1	At least 3/ year	At Least 4/year	At Least 6/year

<sup>\*)</sup> and <sup>\*\*)</sup> and <sup>\*\*\*)</sup> The level will also be allocated if 2 or more consecutive inspections result in Level 2, Level 3 or level 4 respectively

<sup>\*\*\*\*)</sup> Establishments that get inspection result at Level 4 or level 5 shall have their Approval for export suspended until it is demonstrated that all critical non-compliances are resolved and proving to be effective to control food safety. Inspection frequency may be decided based on progress on solving the non-compliances

Inspection frequencies shall not be exceeded but if they cannot be met priority shall be given to medium and high-risk operations

#### Ratings Change and Frequency of Inspection

When the rating of an establishment is changed:

- To a lower level the next inspection shall occur at the frequency of the lower-level rating.
- To a higher level the next inspection shall occur at the frequency of the lower level. Any two consecutive similar higher ratings will result in that rating being the accepted inspection frequency.



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