

**BUMPY OR SMOOTH ROAD AHEAD IN COMPLIANCE WITH EUROPEAN UNION REGULATIONS? CHALLENGES AND OPPORTUNITIES FOR SMOKED CATFISH EXPORT FROM NIGERIA.**

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**ABSTRACT**

Trade in smoke dried fish is driven by demand from Africans in the European Union (EU) and United States. The EU hygiene package follows the principles of the farm to table promoted by the World Trade Organisation (WTO) and was designed to protect the health and safety of consumers as well as addressing animal welfare, plant health and environmental protection. Nigeria can export all forms of fishery products to the EU community except aquaculture products. EU rules have become more stringent and in the case of aquaculture products include compliance with raw material traceability, existence of an aquaculture residue plan on heavy metals, contaminants, pesticides and veterinary drugs. Presently, the country is still in the process of adopting requirements to meet the EU regulations on quality control for farmed products. This paper is exploratory in nature and focuses on the smoked catfish export being mostly an aquaculture produce. Large consignments of smoked fish have been rejected due to mould growth, insect infestation, inappropriate packaging and occurrence of contaminants. Huge public investment is required for setting up a certification system and update administrative provisions, monitoring technologies and sanitary control. Considering this, Nigeria is challenged with inadequate technical infrastructure for environmental management of aquaculture. Therefore, what are implications for small-scale commercial catfish farms and fish processors in smoked catfish export in overcoming these technical barriers within a short period? What should be the roles of the State and regulatory agencies in surmounting these obstacles?

**INTRODUCTION**

Fish and fishery products contribute approximately 10% of total World agricultural exports (UNCTAD, 2017). Growth in fish and fishery products trade is driven by high demand fuelled by growing production. In recent years, share of developing countries in global fish trade is growing and declining in developed economies.

Nigeria was harmonized to export fish and fisheries products to the European Union in 1998. Nigeria exports shrimps, crabs' legs; cuttlefish; oysters; periwinkles; **smoked dried catfish**, fish fillets, especially soles; shark fins and oils; and live ornamental fish of indigenous species (FAO 2007, FAO,

2017). There is a high demand for smoked-dried fish from West Africa consequence upon growing demand by African- Caribbean living in the US and Europe.

Nigeria is the highest producer of the African mud catfish *Clarias gariepinus* in the World. Often faced with glut, smoked catfish presents an opportunity to absolve excess production at the domestic level and for export. Presently, export of smoked catfish (Siluruformes) to the US is under ban. For many catfish farmers, the EU market presents a market opportunity to be harnessed.

Nigeria is listed in the first category of countries that can export all forms of fish and fishery products caught from the wild to the EU community. EU Council Directives 2006/88/EC, 2008/53/EC, 2012/31/EU and 2014/22/EU restrict access to all ‘commercial’ consignments of cultured fish from exporting countries into the EU without satisfying listed conditions. EU Directives (hygiene package) have become some forms of barrier to accessing the EU market by many catfish producers/processors in Nigeria.

Can the small-scale fish farmers become active players in the export of smoked catfish to the EU?

### **GOAL**

The goal of the presentation is to discuss the possible challenges and opportunities for smoked catfish export especially of farm origin from Nigeria to the EU.

### **OBJECTIVES**

- To discuss the status of the aquaculture industry in Nigeria with reference to cultured catfish.
- To assess Nigeria’s readiness for compliance with EU Directives on the placement of aquaculture products in the EU market.
- To recommend to the catfish farmers and fish processors especially those operating on small-scale, ways of overcoming trade barriers to exporting their products to the EU markets.

### **METHODOLOGY**

The studies used mixed methods: interviews, and experiences in the export of smoked catfish, regulatory, supervisory and inspection activities. Secondary data were also reviewed for this study and findings presented in the sequence of the objectives raised.

### **FINDINGS**

**To discuss the status of the aquaculture industry in Nigeria with reference to cultured catfish.**

Nigeria has suitable land (1.7 million ha) and water resources (14 million ha) for aquaculture production enough to be self-sufficient in fish production. From 2005, several initiatives led to an exponential growth in fish farming in Nigeria which included the investment of \$30m in the NEPAD World Fish Programme for sustainable African Aquaculture (NEPAD FISH FOR ALL SUMMIT/ Presidential Initiative; birth of the Catfish Farmers Association of Nigeria -a formidable Non-Governmental Organisation championing the growth of the Catfish industry, the National Aquaculture Strategy for Nigeria; MSME/World Bank interventions, WAAPP, Growth Expansion Scheme and the 4-year implementation plan under the Fisheries and Aquaculture Value Chain.

Currently, Nigeria occupies the enviable position as the highest producer of *Clarias gariepinus* not only in Africa but also globally. Nigeria is the world's largest producer of farmed North African catfish with over 160,000 tonnes in 2015 increasing its output by 39% since 2010. (Eurofish International Organisation, 2017). The African Catfish has more market value and demand for local consumption and potentials for export compared to other species. Despite increasing demand, a glut occurred in catfish production (Oyeleye, 2007). Glut led to the value-addition of catfish in the form of smoked catfish.

**02. To assess Nigeria's readiness for compliance with EU Directives on the placement of aquaculture products in the EU market (Opportunities).**

The 2016 Aquaculture Regulation has been signed by the Honourable Minister of Agriculture and Rural Development making it a legal instrument and the National Monitoring Residue plan carried out and documented for 2016 and 2017.

There is an ongoing process to accredit the Nigerian Fisheries Laboratory to both local and international standards. One of the requirements which is the expansion of the microbiology laboratory is being addressed. The laboratory has been assessed for ISO 17025 but is waiting to be accredited.

There is national documentation of annual data on aquaculture, record keeping and annual rendition of data/records to the EU. The publication of "Criteria and Guidelines for Certification of Aquaculture Products in Nigeria is freely distributed by the Federal Department of Fisheries to the stakeholders and the general public.

There is increased collaboration and formation of self-help groups among fish farmers towards achieving the desired standards for certification. There is inclusiveness and collaborations amongst public and private organisations, especially between the Competent Authority -Federal Department of Fisheries and the Nigeria Agricultural Quarantine Service (NAQS), the Standard Organisation of Nigeria (SON), Fisheries Society of Nigeria (FISON), Catfish Farmers Association of Nigeria (CAFFAN), and others.

**02. To assess Nigeria's readiness for compliance with EU Directives on the placement of aquaculture products (Challenges).**

Most laboratories in Nigeria do not have the required equipment. Some only have the HPLC with variable wave length which does not have detectors that can monitor to the low level, required to international standard.

There are still limitations with the method development of individual parameters and stated standard methods. Fish matrix has very limited method available in international testing. Limitation to test/analyse certain parameters, such as mercury, is still a challenge.

Other challenges include training in techniques of handling products and the use of advanced technology in the development of smoking kilns to reduce the residue on the finished products. Training of fish handlers in personal hygiene and in handling of raw materials to finished products. AwFishnet is playing a pivotal role with women.

Also, are little or no compliance by most practising farmers, weak linkages between Federal and State Agencies and the need for exports to be differentiated to conform to the correct labelling standards for different countries.

## **RECOMMENDATIONS**

The following are recommendations that will ensure smooth compliance with EU Regulations for the export of smoked catfish to the EU:

- 1) Compulsory adaptation of best practices on all aquaculture establishments, processing facilities, other handlers (packaging and transportation), marketing. Inspection of farms must be all encompassing with accurate documentation of data and other information
- 2) Stakeholders inclusiveness for good governance of transparency, mass participation and decision making
- 3) Establish National Aquatic Animal Health Programme. Veterinary services must be at strategic locations for identification and treatment of diseases and parasites.
- 4) Develop Code of Conduct for aquaculture on environmental and social issues, food safety, animal health disease control and use of drugs for aquaculture.
- 5) Documentation: Daily collection of data on all farm activities, record of inspections; disease occurrence if any, movement of inputs, fish and fisheries products.
- 6) Collaboration with European partners in an EU-funded project called the African Food Tradition revisited by Research (AFTER) to boost competitiveness of local fish farmers and processors.
- 7) Deliberate targeted interventions to ensure compliance with EU Directives for ease of access, the United States Department of Agriculture Food Safety and Inspection Service (USDA FSIS) Notice 14-18 and the certification requirement from NAQS by the Russian Government. This is to avoid operators in the catfish industry from getting disenchanted.

## **CONCLUSION**

Bumpy or Smooth? Not smooth but not too bumpy. Urgent need to create awareness of what needs to be done by Government and stakeholders. Achieving the goal of commercial export of smoked catfish into the EU market requires strong political will, inclusiveness and adequate funding. With the ban on the importation of *Siluruformes* into the US it has become critical for Government to take the necessary steps to ensure the certification of smoked cat fish and other aquaculture products into the EU and all other markets.

## **FOOTNOTES**

AwFishNET Nigeria chapter was midwived by African Union Inter Bureau of Animal Resources (AU-IBAR) in Tanzania 2016. The network is made up of women fish traders and processors, professionals (fishery managers, scientists, accountants, lawyers among others). The network promotes empowerment and visibility of women in the fisheries value chain and advocates on important prevailing fisheries issues.

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