

Sanitary and Phytosanitary Measures: Objectives and Principles of SPS Agreement and Implications for Indian fisheries sector

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Introduction

The basis of much of the world trade today is governed by the various provisions and agreements of the World Trade Organization (WTO). It is a forum where the rules of global trade are evolved, trade agreements are negotiated and finalized and trade disputes are settled. Generally it supports the premise that there should be a free flow of goods, services, capital and labour across national boundaries and it should be as fair as possible. Historically it began in 1948 with the establishment of the General Agreement on Tariffs and Trade (GATT) which became an international organization for international trade matters and negotiations. While the timeline for the agreements of the WTO are rather torturous and long winding, a semblance of concurrence came about after the Uruguay Round of Negotiations which was held during the period 1986-1994, the result of which was the coming into being of the WTO itself on 1st January 2005. The WTO covers most aspects of trade including 'trade in services, and in traded inventions, creations and designs (intellectual property)' (<http://www.wto.org>). They are legally accepted by all the countries who are members in the WTO. Till then the agreements went by the name the GATT (General Agreement on Tariffs and Trade). The Agreement on the Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement or SPSA) along with several important agreements came into force from the date of establishment of the World Trade Organization on 1 January 1995. As on May 2012, 155 countries were members in WTO.

Trade in the world is either for goods or for services and these are the two broad areas covered by the WTO under various agreements governing the two. The outline for the agreements are common, with the details being specific (<http://www.wto.org> last accessed on August 7, 2012). There is the basic principles for trade (GATT), for services (GATS - General Agreement on Trade in Services) and for Intellectual Property (TRIPS- Trade-Related Aspects of Intellectual Property Rights) (Fig. 1). The basic structure of the WTO Agreements is given in table 1.

Table 19.1 The Basic Structure of WTO Agreements

Umbrella	Agreement Establishing the WTO		
	Goods	Services	Intellectual Property
<i>Basic Principles</i>	GATT	GATS	TRIPS
<i>Additional Details</i>	Other goods agreements and annexes	Service annexes	
<i>Market Access Commitments</i>	Countries' schedule of commitments	Countries' schedules of commitments (and MFN exemptions)	
<i>Dispute Settlement</i>	DISPUTE SETTLEMENT		
<i>Transparency</i>	TRADE POLICY REVIEWS		

Source: WTO (available at http://www.wto.org/english/rese/bookspe/agrmntseries4_wpse.pdf)

The additional agreements and annexes which are sector specific are different for GATT and GATS and under GATT comes the regulations for food safety, animal and plant health protection which in other words is the Sanitary and Phytosanitary Measures (SPS). While most of the agreements are for aiding the growth of trade among different countries, there are some which may actually be trade restricting. These are however under very special circumstances and come into force only for ensuring the safety of human life and other living organisms. The SPS regulations fall under this category. The SPS measures aims to protect animal and plant life and human health by ensuring food safety. It recognizes the sovereign right of a country to have protective measures in meeting the above mentioned objectives.

Historical perspective of food safety measures

Food is a very important commodity that is traded the world over. Primary food products as well as processed food products find their way from one end of the globe to another, catering to the needs and demands of consumers. Even in ancient times food was traded because not all civilizations could produce everything it wanted. Also the evolution of settlements, villages, towns and cities saw the rise of agriculture and livestock rearing resulting in surplus production of location specific food produce. Rome depended on Egypt

(<http://history.knoji.com> last accessed on August 6, 2012) and other North African countries for grain. India exported grain fresh fruit and honey to Mesopotamia and Oman (Chinese traded in salt, fish and cattle, which were sent to even places like Greece. Food historians believe that food was selected or rejected based on observation (<http://www.foodtimeline.org> last accessed on August 6, 2012).

Man realized quite early the relationship between food and health and the dangers of consuming food that is spoilt. This led to the creation of laws and regulations that would ensure safe food to consumers. Lásztity et. al. (2004) trace food laws to the ancient times and observe that most ancient civilizations like the Egyptians, the Indians, the Greek, Chinese and Romans had food regulations. They were mainly for protection of consumers against fraud as cases of adulteration of substances like milk etc. was found. Trade guilds formed in the Middle Ages controlled food quality of traded products, especially in Europe.

Detailed specifications on production of bread were stipulated. In thirteenth century France, for the first time the consumers' material interest and health, became part of the code for trade practices. Industrialisation and the rapid expansion of urban settlements and the resultant problems arising out of poor sanitation and hygiene led to growth of food control laws and measures with many such measures being put in place in Europe during the 1920s. After World War II the work towards common international standards began and the FAO/WHO Food Standards Program was established in 1963, and a joint inter governmental body was created: the Codex Alimentarius Commission (CAC) (<http://www.who.int/foodsafety/codex/en/>). Thus it is clear that safe food has been a priority for nations for centuries as man had the knowledge that food can be a cause for poor health and even death in humans. The natural corollary to human health was the health of animals and plants and this in turn forms the crux of the SPS regulations in place in different countries. That it also affects trade resulted in countries coming into agreements on the issue, however, it continues to be trade restrictive in many cases.

Basic Objectives of the SPS Measures

The SPS measures gained importance for countries not only because the safety of its people, animal and plant life was paramount but also because there was a need to offer some sort of protection for its trade as the tariff barriers had been considerably reduced after many rounds of negotiations and trade had been liberalised to a large extent. Countries had taken to Non Tariff Barriers (NTBs) as a form of trade restriction. Besides SPS, the other NTB are the Technical Barriers to Trade (TBT). The scope of TBT is much wider than that of SPS and includes human disease management, food labelling and packaging etc. However, if any of these falls under the purview of food safety it comes under the SPSA. The "SPS measures are expected to be imposed only to the extent necessary to protect human, animal or plant life or health on the basis of scientific information" while TBT can be imposed for other "legitimate" objectives like national security, environmental safety etc.

According to the definition by WTO, Sanitary means health in general and animal health sometimes, phytosanitary means plant health and sanitary and phytosanitary means food safety and animal and plant health. So in effect Sanitary and Phytosanitary means anything to do with food safety and animal and plant health.

The twin objectives of the SPS Agreement under WTO are that it "recognises the sovereign right of Members to provide the level of health protection they deem appropriate; and it ensures that SPS measures do not represent unnecessary, arbitrary, scientifically unjustifiable, or disguised restrictions on international trade". To meet both the objectives, WTO encourages members to use accepted International standards like the Codex of the FAO/WHO, the OIE, the World Organization for Animal Health (<http://www.oie.int/>) or the International Plant Protection Convention (IPPC) of the FAO (<https://www.ippc.int/>). In specific cases where there are no such standards or even otherwise where they exist but countries would prefer higher standards, the member countries are free to evolve their own standards provided they are scientifically proven.

Principles that should govern SPS Measures

The core principles that govern the formulation of SPS measures and regulations by countries are non discrimination, harmonization and equivalence. The Most Favoured Nation principle (MFN) should be adopted and the application of the regulation should be uniform across different trading partners as well as within the country. A country cannot have a different standard domestically and another governing international trade. There should be a measure of transparency in the development and implementation of measures which includes that the measures should be notified sufficiently in advance giving time to trading countries to comply with the same. There is also a provision for technical assistance to developing countries and special and differential treatment in such cases. Developing countries will be aided with technology, research or infrastructure; may be given advice grants; and training, technical expertise and equipment for complying with the measures and take advantage of the market. The special and differential treatment takes into account the special needs of developing countries and gives provisions of longer time periods for compliance to the standards.

It is also expected under the SPSA that the control, inspection and approval procedures must also be fair and just. While it is necessary that the measures must be scientifically justified, there is also a need for harmonization, i.e., making an effort to bring the standards on par internationally and not much variation in similar standards/ measures. The equivalence principle requires that even if the measures are apparently different if an exporting country demonstrates that its measures achieves the similar objectives of the importing country, the measure has to be accepted as equal by the importing country.

Governments also have the right to restrict international trade when it is necessary to protect human, animal or plant health. Besides they can also have their own standards other than any recognised international standard and also can go in for higher or more stringent standards to protect human, animal or plant health but these measures or standards must be based on scientific risk assessment on, whether it is a food borne risk and has the potential to harm human and/or animal health or there is a possibility of introduction of a disease or pest which may spread in the country and cause economic or biological losses, and also follow all the other tenets prescribed like consistency in application and it should not lead to unnecessary trade restrictions

“According SPS Agreement, an SPS measure is any measure applied:

- a. to protect animal or plant life or health within the territory of the Member from risks arising from the entry, establishment or spread of pests, diseases, disease-carrying organisms or disease-causing organisms;
- b. to protect human or animal life or health within the territory of the Member from risks arising from additives, contaminants, toxins or disease-causing organisms in foods, beverages or feedstuffs;
- c. to protect human life or health within the territory of the Member from risks arising from diseases carried by animals, plants or products thereof, or from the entry, establishment or spread of pests; or to prevent or limit other damage within the territory of the Member from the entry, establishment or spread of pests.”

Table 19.2 SPS Measures at a Glance

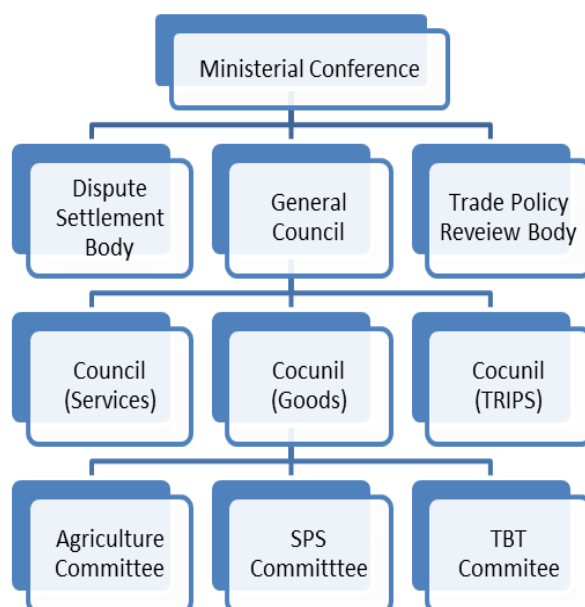
To protect:	from:
Human or animal life	risks arising from additives, contaminants, toxins or disease-causing organisms in their food, beverages, feedstuffs
Human life	plant- or animal-carried diseases
Animal or plant life	pests, diseases, or disease-causing organisms
Country	damage caused by the entry, establishment or spread of pests

<http://www.wto.org>

SPS measures may be related to product criteria, processes and production methods, testing, inspection, certification approval procedures, quarantine treatments, animal transport and packaging and labelling requirements which are directly related to food safety.

SPS Committee

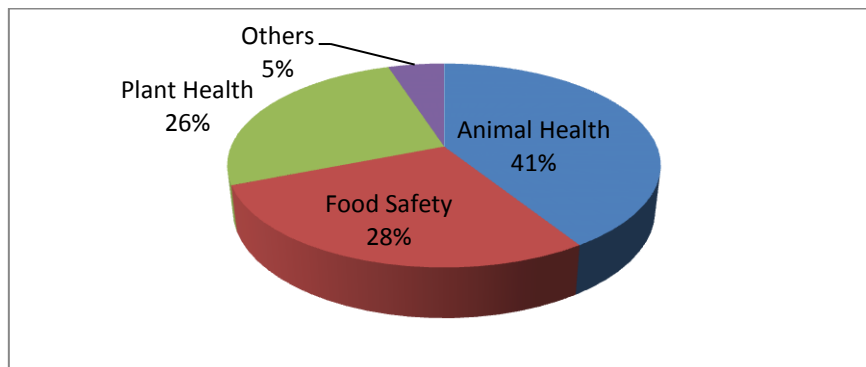
The SPS Committee is a special committee under the WTO that looks after the implementation of the SPS Agreement. It takes into account the compliance and studies the impact on trade. It is basically a forum for exchange of information on SPS among member countries. The structure of the WTO with regard to the SPS Committee is given in Fig. 1. Members can also raise issues individually or as a group with other members sometimes supporting the 'trade concern' in the meetings. The member countries agree to resolve the concerns bilaterally and the discussions and outcomes are reported to the Committee.



Source: Fall, Marième, Overview of the WTO SPS Agreement, Presentation made at the Capacity Building Workshop on WTO and Trade Issues' organized by UNCTAD-India, FICCI, CWTOS and ITC (Geneva) at New Delhi during July 20-22, 2010

Figure 19. 1 Structure of the SPS Committee under WTO

Most of the trade concerns during the period 1995-2009 were regarding animal health followed by food safety and plant health (Fall, 2010) (Fig. 2). While earlier the developed countries were the countries raising concerns now increasingly developing countries are also raising trade concerns with India being one of them.



Source: Fall (2010)

Figure 19.2 Trade Concerns raise by member countries during 1995-

Increasingly the concerns are rising for developing countries mainly because the importing country standards are becoming more and more stringent. The developing countries are not sufficiently equipped infrastructural or with trained manpower to meet the challenges. Besides, there is an almost simultaneous and exponential growth in private standards, which are being adopted by importers in these countries.

Table 19.3 Some of the Specific Trade Concern (STC) (1995-2007) involving India and related to fisheries

S.No.	Item Number	Description of Measure	Member(s) Maintaining the Measure	Member(s) Raising the Issue	Status*
India					
1.	39	Maximum levels for certain contaminants (aflatoxins) in foodstuffs	European Communities	Argentina, Australia, Bolivia, Brazil, Gambia, India, Indonesia, Malaysia, Philippines, Senegal, Thailand	R
2.	61	Import restrictions on bovine semen	India	Canada, European Communities	PR
3.	62	Restrictions on imports of horses	India	European Communities	NR
4.	96	Geographical BSE risk assessment	European Communities	Canada, Chile, India	R
5.	185	Restrictions due to avian influenza	India	European Communities	NR
6.	186	Phytosanitary import restrictions	India	United States, European Communities	PR
7.	192	Non-notification of various SPS measures	India	United States	NR
8.	200	Ban on food grade wax	India	United States	NR
9.	223	Import requirements for Indian mangoes	Japan	India	NR
10.	240	Biotech labelling and import approval process regulations	India	United States	NR
11.	253	Export certification requirements for dairy products	India	United States	NR
Fisheries					
12.	8	Ban on salmon imports	Australia	Canada, United States	R
13.	11	Restriction on levels of copper and cadmium in imported squid	Spain, European Communities	United States	R
14.	33	Salmonella-related restriction on fishmeal imports	European Communities	Chile, Peru	NR

S.No.	Item Number	Description of Measure	Member(s) Maintaining the Measure	Member(s) Raising the Issue	Status*
15.	72	Measures regarding canned tuna in oil	Belgium, European Communities	Philippines	NR
16.	77	Restrictions on canned tuna	Egypt	Thailand	NR
17.	85	Import restrictions on prawns and prawn products; revised generic IRA for prawns and prawn products	Australia	China, Thailand	NR
18.	97	Restrictions on the use of fishmeal	European Communities	Chile, Norway, Peru	NR
19.	130	Restrictions on shellfish	European Communities	Indonesia	NR
20.	142	Zero tolerance for e-coli	China	United States	NR
21.	157	Quarantine measures for the entry and exit of aquatic products	China	European Communities	R
22.	171	Animal health conditions and certification requirements for live fish	European Communities	Australia	NR

*NR= Not Reported, P = Partially resolved, R= Resolved

Disputes and Dispute Settlement

Disputes arise when members feel that there is a violation of the commitments made in the Agreements and only governments can raise a dispute and that has to be notified to the WTO Secretariat. The dispute settlement procedure follows the usual mechanism as for all other disputes in WTO where the Dispute Settlement Body takes up the matter. It sets up panels of experts to look into the issue (but can accept or reject the panel findings). The concerned members are given time for bilateral consultations, followed by the setting up of the panel (in case no agreement is reached) and time for it to complete its assessment and preparation of the report. The Dispute Settlement Body takes the final decision in the matter and if not contested within 60 days will become the final ruling in the matter.

Over 250 disputes have been raised after the establishment of WTO. Several cases have been resolved through bilateral consultations. Panels have looked into cases relating to the EU ban on meat treated with growth-promoting hormones; Australia's restrictions on imports of fresh, chilled or frozen salmon; and Japan's requirement that each variety of certain fruits be tested with regard to the efficacy of fumigation treatment (<http://wto.org>).

The import restriction by Australia on salmon was contested by Canada on the ground that salmon being imported for human consumption may not lead to spread diseases in wild salmon. The timeline of the dispute spread over 1997 to 2000. The panel set up to look into the matter found that the ban violated Article 5.1, 5.5 and 5.6 of the Agreement. The dispute ended with a mutually agreed solution.

Article 5: : Assessment of risk and determination of the appropriate level of sanitary and phytosanitary protection

1. Members shall ensure that their sanitary or phytosanitary measures are based on an assessment, as appropriate to the circumstances, of the risks to human, animal or plant life or health, taking into account risk assessment techniques developed by the relevant international organizations.
5. With the objective of achieving consistency in the application of the concept of appropriate level of sanitary or phytosanitary protection against risks to human life or health, or to animal and plant life or health, each Member shall avoid arbitrary or unjustifiable distinctions in the levels it considers to be appropriate in different situations, if such distinctions result in discrimination or a disguised restriction on international trade. Members shall cooperate in the Committee, in accordance with paragraphs 1, 2 and 3 of Article 12, to develop guidelines to further the practical implementation of this provision. In developing the guidelines, the Committee shall take into account all relevant factors, including the exceptional character of human health risks to which people voluntarily expose themselves.
6. Without prejudice to paragraph 2 of Article 3, when establishing or maintaining sanitary or phytosanitary measures to achieve the appropriate level of sanitary or phytosanitary protection, Members shall ensure that such measures are not more trade-restrictive than required to achieve their appropriate level of sanitary or phytosanitary protection, taking into account technical and economic feasibility.

Table 19.4 Dispute: Restrictions on imports of mangoes

Raised by:	Brazil
Supported by:	India
Dates raised:	June 2003 (G/SPS/R/30, paras. 34-35), October 2003 (G/SPS/R/31, paras. 25-26), March 2004 (G/SPS/R/33, paras. 65-67), June 2004 (G/SPS/R/34, paras. 25-26), March 2005 (G/SPS/R/36/Rev.1, paras 81-82)
Relevant document(s):	Raised orally
Solution:	Regulations modified to permit imports
Status:	Resolved

1. Brazil indicated that it had been seeking approval to export mangoes to Japan for 18 years. Japan demanded steam treatment in spite of the satisfactory level of the measures taken by Brazil, Chile and other potential exporters to avoid fruit fly. Japan had continuously demanded more information and had not taken previous scientific studies into account. Although Japan had offered technical assistance, this had not facilitated the process. Brazil considered that Japan's measures were inconsistent with the provisions of the SPS Agreement on equivalence, regionalization and technical cooperation.
2. Japan stated that Brazil had requested technical assistance in 1986 but had stopped the technical assistance in 1990 because it wished to develop its own technique based on hot-water treatment. This design was launched in 1998. Both countries agreed on this and the final data was submitted in 2001. Supplementary information was needed, however, before Japan could approve the measures and conclude the necessary technical studies.
3. In October 2003, Brazil stressed that Japan's restrictions on imports of mangoes were unjustified as mangoes were produced in an area 2000 km away from the area where the fruit fly was found. Brazil was waiting for the completion of the public consultation process in Japan and requested Japan to act swiftly to allow the importation of mangoes. Japan reported its authorities had recently received data from Brazil on the trapping of fruit flies and was in the process of reviewing the information. Brazil had submitted technical information in October 2001 and the technical studies by Japan were progressing well.
4. In March 2004, Brazil stated that the Japanese authorities had reacted favourably to technical data provided by Brazil the previous year. The evaluation process had entered a new phase and Brazil

hoped to come to a satisfactory solution including the signing of a protocol on packaging, storage and transportation of mangoes to Japan. India noted that, while India was a fruit fly free area its request for market access for mangoes into Japan had been under review for ten years. India had submitted data to Japan and hoped for a favourable response. Japan stated that technical evaluation of data submitted by Brazil was in the final stages. With respect to India's concerns, Japan had not received technical data from India but looked forward to receiving such data.

5. In June 2004, Brazil reported that after the last meeting, Brazilian and Japanese phytosanitary authorities had held two technical meetings in Japan to discuss a phytosanitary protocol that would allow Brazilian mango exports to Japan. In the last meeting, the Japanese authorities had confirmed that negotiations on the protocol had been concluded, and certification of consignments remained the only outstanding issue. The Japanese authorities had indicated that this issue could be resolved in parallel with the public consultation phase and Brazil encouraged Japan to initiate the public consultation soon. Japan confirmed that the technical evaluation on the Mediterranean fruit fly had been completed and a bilateral meeting had been held to coordinate plant quarantine measures for market access and requirements for hot water dipping. The new protocol was expected to be implemented based on the outcomes of these bilateral discussions.

In March 2005, Brazil informed the Committee that on 29 September 2004, Japan had modified its phytosanitary regulations and established specific norms for the import of mangoes from Brazil. In December 2004, Japanese inspectors had gone to Brazil to examine packing houses. On 12 January 2005, the first shipment of Brazilian mangoes had been exported to Japan, which marked the beginning of a regular flow of exports of mangoes to Japan. To date, eight shipments of mangoes (variety Tommy Atkins) had been exported without restrictions. Japan noted that the measure was taken through the appropriate pest risk assessment process based on technical data submitted by Brazil.

Source: <http://wto.org>

Are SPS provisions trade restrictive?

The SPS measures can very easily become trade restrictive and a Non Tariff Barrier by its characteristic features embedded in the Agreement, particularly for developing countries (Das, 2008). For instance Governments (countries) can restrict trade on the premise of protecting human, animal or plant health. Though not entirely arbitrary in cases where sufficient scientific evidence is lacking or even based on some available information such steps can be brought into force (though additional information must be sought and it must be subject to review within a reasonable period of time as a matter of 'precaution'. In spite being against fair access in international trade, many a times the protection of domestic industry from international competition is the underlying factor for resorting to such measures. More so because the market access in general has considerably increased because of substantial reduction in tariffs across the board. And because it is primarily a technical matter sometimes it is not possible for exporting countries to challenge the same for want of scientific evidence. If challenged however a country has to prove scientifically that there exists a risk to health. For developing countries the compliance to the standards is a major drawback with standards becoming more and more stringent. According to Das (2008) SPS measures were the third most frequently reported trade barrier for developing countries. 74 per cent of the submissions related to residue limits, freedom from disease and treatments and 17 per cent to testing, certification and conformity to standards. So

Implications for fisheries sector in India

Safe food is a requirement of the consumers that all sectors have to fulfill. The fact remains that the SPS measures are here to stay and to gain advantage in trade and to develop taking the advantage is what India must aim at. India has the expertise to put in place a robust system of SPS in the country on par with world standards. What is lacking is

suitable infrastructure as well as the fool proof monitoring system that is warranted in implementing the same.

For fisheries the challenges are even greater as the sector is catered to by a diverse fleet and methods of fishing, poor onboard and off board infrastructure and the lack of appropriate technical manpower for implementation of food safety in the sector.

As for the measures themselves there still exists non-harmonization of standards with standards more stringent than internationally accepted standards without proper risk analysis. For example EU does not stipulate limits for *V parahaemolyticus*, but some mEU countries like Italy and France has stipulated specific limits. *Vibrio parahaemolyticus* is found in marine environment in the tropics and is susceptible to chilling/freezing or heating to 60 degrees and is not considered a hazard in products which are to be cooked before consumption. In Japan the limits are 1000 to 10000 per gram for ready- to-eat cooked products. The differences in levels of pesticides and heavy metals in fish products stipulated by different countries are given in table 4 to illustrate the point.

Table 19.5 Levels of pesticide and heavy metals allowable in fish imported into different countries

Pesticides/ Heavy Metal	EU	USA	Japan
DDT	1ppm	5ppm	3ppm
Aldrin	0.2ppm	0.3 ppm	0.1 ppm
Chlordane	0.02ppm	0.3 ppm	0.5ppm
Fluridone	0.2ppm	0.5ppm	0.5ppm
Cadmium	0.5 ppm	3ppm	3 ppm
Lead	0.5ppm	1.5ppm	1ppm
Methyl Mercury	0.5ppm	1ppm	0.3ppm

Source: Deepak Shekhar, Joint Director, EIA-Koch, Role of Export Inspection Council of India and Export Inspection Agencies in the WTO scenario, presentation made at the National Seminar on WTO & its impact on Indian Seafood Trade, organized by SOFTI and CIFT and held at Cochin on 28 June 2008

India has been facing rejections in the International market, especially to EU, based on SPS measures. Cases of rejection of Indian Shrimp by EU in 2002 for the presence of residues of antibiotics cholomphenicol and nitrofurran. The stipulation was that residues should not exceed 0.3ppb and 1 ppb with little scientific evidence to prove that at intake of higher levels than those prescribed would be harmful to human health (Greenhalgh, 2004), Similarly heavy metal residues in cephalopods have resulted in rejections. The EU standards are more stringent than international standards and it comes under the special measures for consumer protection, animal and plant health (http://europa.eu/pol/food/index_en.htm). Earlier in 1997 (Salagrama, 2004) the EU had banned all seafood imports from India citing poor infrastructure for harvesting and processing of fish, with exporters losing heavily in the subsequent years. This was when steps had already been initiated to upgrade processing facilities to meet EU standards.

It can be noted that even within EU, different countries have different standards, as mentioned earlier. Rejections have also taken place for unspecified reasons (Rajeev, 2008) There are instances of rejection of the Indian farm-raised and sea-caught marine products for the presence of bacterial inhibitors/ antibiotic residues without specifying the residue involved in such rejections. Health authorities involved in testing activities in India feel that harmful residues are not possible to be present in the sea caught products.

Different countries have different standards. Levels of Histamine can vary from 50ppm in US to 150ppm in EU (Mathew, 2003 quoted from Salagrama, 2004). EU requires a national agency certificate while individual processors certificate would be sufficient in US. Mouldy smell has been cause for rejections of shrimp to Japan. There is lack of transparency and the measures are not notified in a timely manner and sometimes available only in the local language.

EU has a system of Rapid Alert where a rejection from a particular is known to all the member nations. However the procedure for lifting rapid alerts by the member countries is not harmonized. The number of tests required varies from country to country for lifting the rapid alert. Another drawback, especially with EU., is the destruction of consignments with antibiotic residues. This causes heavy losses as it prevents the processor from the possibility of re-export to another country with permissibility of higher levels of the same.

The positive side of the various issues the seafood export sector faced in the late 1990s and early 2000s issue has been that today quality and food safety issues are taken seriously in the sector, especially for export purposes, and the country can boast of (<http://www.mpeda.com>) 287 processing units having EU approval. The EU approval is accorded by The Export Inspection Agency (EIA) after inspection by the Inter Departmental Panel (IDP) consisting of representatives of EIA, MPEDA (Marine Products Export Development Authority) and CIFT (Central Institute of Fisheries Technology). The US also enforced the HACCP system which Indian exporters have to comply. There has been support at the government level and programmes are being implemented by MPEDA for upgradation of facilities at landing centres and for fishing boats as well. India can do well to improve its technical capabilities, develop suitable infrastructure and generate country level data to support our claims that standards need not necessarily be so high.
