



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2019-6691

FINAL REPORT OF AN AUDIT
CARRIED OUT IN
MAURITANIA
FROM 14 OCTOBER 2019 TO 25 OCTOBER 2019
IN ORDER TO
EVALUATE THE CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION
OF FISHERY PRODUCTS INTENDED FOR EXPORT TO THE EUROPEAN UNION

In response to information provided by the competent authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

This report describes the outcome of an audit in Mauritania carried out from 14 to 25 October 2019, as part of the published Directorate-General for Health and Food Safety audit programme.

The objectives of the audit were to evaluate whether the official controls put in place by the competent authority can guarantee that the conditions of production of fishery products in Mauritania destined for export to the European Union (EU) are in line with the requirements laid down in EU legislation and to verify the extent to which corrective actions submitted to the Commission Services in response to the recommendations following the previous (2011) fishery products audit (ref. DG(SANCO) 2011-6203) have been effectively implemented and enforced by the competent authority (National Office of Sanitary Inspection of Fisheries and Aquaculture Products - ONISPA).

There have been many improvements since the audit in 2011, including accreditation of ONISPA inspection activities, their laboratory network, upgrading of the national fleet of freezer vessels and the adoption of TRACES. ONISPA has also identified areas for improvement, and for which structural measures are being taken.

The official control system is based on EU-aligned legislation and comprehensive documented procedures, checklists and good practice guides. These, along with internal audit procedures, rotation/exchange of inspectors and accreditation, ensure that controls are implemented according to planned frequencies and in a consistent way.

It covers the entire production chain with the exception of artisanal vessels, which since the termination of the competent authority control strategy in 2016, relies on inconsistent food business operator auto-controls. In general, official controls identified relevant findings and ensured follow up. However, during the review of Hazard Analysis Critical Control Point (HACCP) plans, inspectors did not reliably identify if they were fully adapted to the processing activities, nor verify traceability in all cases. For the fish markets, the control reports show that alternative premises or arrangements (e.g. direct supply of fishery products from artisanal vessels to processing facilities) are required.

The shortcomings identified impact to some extent on the ability of the competent authority to provide consistently, and in full, the guarantees required by the EU health certificate when exporting fishery products to the European Union.

The report contains recommendations to address the identified shortcomings.

Table of Contents

1	Introduction	1
2	Objectives and scope	1
3	Legal Basis	2
4	Background	2
4.1	General	2
4.2	Production and trade information	3
4.3	Rapid alert system for food and feed (RASFF) notifications	3
5	Findings and Conclusions	3
5.1	Legislation	3
5.2	Competent authority	4
5.3	National provisions and procedures for listing establishments exporting fishery products to the EU	6
5.4	Official controls of production and placing on the market	8
5.4.1	<i>Official control system in place</i>	8
5.4.2	<i>Official controls of fishery products</i>	13
5.5	Follow up of RASFF notifications	14
5.6	Laboratories	15
5.7	Official certification	16
6	Overall Conclusions	17
7	Closing Meeting	18
8	Recommendations	19
ANNEX 1 – Legal References		

ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
CS	Cold stores
DG Health and Food Safety	Directorate-General for Health and Food Safety of the European Commission
EEZ	The exclusive economic zone (EEZ) is a sea zone prescribed by the 1982 United Nations Convention on the Law of the Sea over which a state (in this case Mauritania) has special rights regarding the exploration and use of marine resources, including energy production from water and wind.
EPBR	Bay of Repos Port Facility (Nouadhibou)
EU	European Union
EU Health Certificate	Model health certificate for imports of fishery products intended for human consumption, as defined in Appendix IV to Annex VI to Commission Regulation (EC) No 2074/2005
EU Listed	Facilities included in lists made in accordance with Article 12 of Regulation (EC) No 854/2004 and available at http://ec.europa.eu/food/safety/international_affairs/trade/non-eu-countries_en from which imports into the EU are permitted
EUROSTAT	Statistical Services of the European Union
FBO	Food business operator
GCM	<i>Guarde Costale Mauritanienne</i>
HACCP	Hazard Analysis Critical Control Points
IMROP	<i>Institut Mauritanien de Recherches Océanographiques et des Pêches</i> . A public body that among other things contributes to the sustainable development of fisheries and undertakes monitoring of the aquatic ecosystem.
MPEM	<i>Ministère Des Pêches et De L'Economie Maritime</i>
MPM	Nouakchott Fish Market
ONISPA	National Office of Sanitary Inspection of Fisheries and Aquaculture Products
PCBs	Polychlorinated biphenyls
PP	Processing plant
RASFF	Rapid Alert System for Food and Feed
TRACES	Trade Control and Expert System
TUNAC	Tunisian Accreditation Council. They have been responsible for accreditation of laboratories and ONISPA inspection services in Mauritania.
SMCP	<i>Société Mauritanienne pour la Commercialisation de Poisson</i> . The State body that since its creation in 1984 has had a monopoly on the organisation and export of frozen fishery products found in waters under Mauritanian jurisdiction.

1 INTRODUCTION

The audit took place in Mauritania from 15 to 25 October 2019, as part of the audit programme of the European Commission’s Directorate-General for Health and Food Safety (DG Health and Food Safety). The audit team comprised two auditors from DG Health and Food Safety.

An opening meeting was held in Nouahibou on 15 October with the competent authority (CA) the National Office of Sanitary Inspection of Fisheries and Aquaculture Products (ONISPA) within the Ministry of Fisheries and Maritime Economy (MPEM).

At this meeting, the audit team confirmed the audit objectives and itinerary, and requested additional information on specific elements of the control system in place. Representatives from the CAs accompanied the audit team throughout the audit.

2 OBJECTIVES AND SCOPE

The objectives of the audit were:

- To assess whether the official controls put in place and implemented by the CAs can provide adequate assurance that the conditions of production of fishery products in Mauritania and destined for export to the European Union (EU) are in line with the relevant requirements laid down in EU legislation, and in particular that it can attest to the requirements contained in the model health certificate for fishery products intended for the EU (as defined in Appendix IV to Annex VI to Commission Regulation (EC) No 2074/2005, hereafter: “the EU health certificate”); and, in this context:
 - to verify the extent to which corrective actions submitted to Commission Services in response to the recommendations contained in the report of the earlier 2011 audit on fishery products¹ have been effectively implemented and enforced;
- In terms of scope, the audit covered the national legislation in force, the organisation and competencies of the CA, their performance in terms of both the design and on-the-ground implementation of the official control systems in respect of the production chain of fishery products intended for EU export, and the operation of export certification procedures.

In pursuit of these objectives, the audit itinerary comprised the following:

Competent Authority		
Competent Authority (CA)	1	ONISPA, Head Quarters located in Nouadhibou within the Ministry of Fisheries and Maritime Economy (MPEM).

¹ Audit report reference: ref. DG(SANCO) 2011-6203:
http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=2659.

Regional level	2	Inspection Service North and Inspection Service South (located at the Nouakchott "antenna"), within the Department of Sanitary Inspection (ONISPA).
Laboratory visits		
Fishery Products	2	ONIPSA Laboratories Nouakchott (Chemistry and Microbiology Divisions)
Primary production		
Landing sites/ports	3	Tanit Port, Port of Nouakchott (PAN-PA) and Port of Nouadhibou (PAN).
Fishing vessels	3	Small artisanal vessels supplying chilled fish.
Wholesale (Fish) Markets	2	Bay of Repos Port Facility (EPBR) and the Nouakchott Fish Market (MPN).
Processing Facilities/Other		
Freezer Vessels	2	One in the process of approval.
Factory Vessels	1	
Establishments on land	8	EU-listed and including one cold store (listed incorrectly as a processing plant).
Airport	1	Nouakchott airport. Temporary chilled storage, export certification and dispatch by airfreight.

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation, and in particular Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

A full list of the EU legal instruments relevant to the scope of this audit is provided in Annex I to this report. Legal acts quoted refer, where applicable, to the last amended version².

4 BACKGROUND

4.1 GENERAL

Mauritania is included in Annex II to Commission Decision 2006/766/EC which sets out the list of third countries and territories from which imports of fishery products are permitted.

EU Member States are authorised to import fishery products from Mauritania from 111 EU-listed facilities, 82 freezer vessels and 1 factory vessel (list valid from 24 June 2019).

² EU legislation (Internet): <http://eur-lex.europa.eu/homepage.html>. Full legal references to EU legal acts quoted in this report are provided in Annex 1 and refer, where applicable, to the last amended version.

4.2 PRODUCTION AND TRADE INFORMATION

From 2016 to 2018, the EU imported 117 779 tonnes of fishery products from Mauritania (EUROSTAT data). A wide variety of fish, cephalopods and crustaceans (particularly shrimp) are captured for export. Spain is by far the biggest importer (83%).

Exports of fish meal/fish oil (FMFO) have doubled between 2014 and 2018, making this country now the largest exporter of fishmeal and fish oil in West Africa. These exports are destined almost exclusively for animal feeding stuff, and some for pharmaceutical/cosmetic use.

The EU and Mauritania have recently agreed to extend, for a maximum one year, the protocol to the sustainable fisheries partnership agreement. Under the protocol, the EU fleet can fish in Mauritanian waters for various species, up to 287 050 tonnes a year.

EU funding has contributed to the development of a new port (Tanit) near the capital, Nouakchott and currently facilitating a programme with the overall aim of supporting artisanal fishing to provide regional food security, and to support employment and women's entrepreneurship.

4.3 RAPID ALERT SYSTEM FOR FOOD AND FEED (RASFF) NOTIFICATIONS

Members of the RASFF network³ have issued 38 relevant notifications linked to products originating in Mauritania since the 2011 audit. Most are related to rupture of the cold chain (classified as a "border rejection").

Section 5.5 describes how the CA handled these RASFF notifications.

5 FINDINGS AND CONCLUSIONS

5.1 LEGISLATION

Legal requirements

Article 46(1)(a) of Regulation (EC) No 882/2004.

Article 11(4)(a) of Regulation (EC) No 854/2004.

Findings

1. The MPEM is responsible at national level for aligning the relevant Mauritanian food safety legislation with that of the EU.
2. The legal framework (other than for updates) and the requirements for fishery products to be exported to the EU remain largely unchanged since the fishery product audit in 2011 (see footnote 1.).

³ European Commission, EFSA, EFTA Surveillance Authority, EU Member States, Iceland, Liechtenstein, Norway and Switzerland.

3. These legal documents and standards contain the requirements to be followed by food business operators (FBOs) involved in the production chain of fishery products for export to the EU.
4. Supplementary legislation is at a draft stage (an *Arrêté* being prepared by MPEM) covering the technical conditions, including temperature control of fishery products during transport. This legislation exceeds EU requirements and is in response to rupture of the cold chain, particularly during transport in containers by road transport vehicles.

Conclusions on Legislation

5. The Mauritanian rules applicable to fishery products (whether for the domestic market or the EU) are closely aligned with EU rules and allow the CA to control and, as necessary; enforce compliance with the relevant EU requirements.

5.2 COMPETENT AUTHORITY

Legal requirements

Article 46(1) of Regulation (EC) No 882/2004, in particular points (b) to (e).

Findings

Structure and organisation

6. The ONISPA was created by Decree No. 066/2007 of 13 March 2007 amended by Decree No. 2008-117 of 8 May 2008. Its structure remains largely unchanged since the last audit in 2011.
7. In brief, there are two ONISPA sites. The headquarters of ONISPA is located in Nouadhibou, where inspection activities are carried out by Inspection Service North (SIN). A second site is located in the Nouakchott "antenna" where inspection activities are carried out by the Inspection Service South (SIS). Both inspection services report to the Sanitary Inspection Department, located at the headquarters.
8. ONISPA has been ISO accredited (17020, version 2012) since February 2016.

Powers, Independence and Supervision

9. The powers of ONISPA officials are described in the above-mentioned legislation and are adequate. In particular Law 2015-017 of 29 July 2015 on the "*Code des Pêches Maritimes*" and associated Decrees covering inspection and control of fishery products intended for human consumption and export to the EU.
10. Measures have been put in place to ensure that staff is free from any conflict of interest and persons carrying out the official controls are officials of the Mauritanian State (subject to a code of ethics for civil servants), paid by ONISPA and sworn in before the Court of Appeal. At a practical level, inspections are conducted in the field by inspection

teams that operate on a rotational basis subject to periodic review under their ISO accreditation.

11. Internal audits of the ONISPA inspection system is carried out as part of the requirements of ISO 17020 and ISO 17025 (most recently for both sites in August and September 2019 – and identifying areas for correction/improvement). These have been performed annually since 2015 for inspection and 2013 for laboratories to verify the conformity of the ONISPA inspection system with requirements in force.
12. In addition, external audits are performed annually since the Accreditation by the Accreditation Body (TUNAC) to verify the compliance of the system with the requirements of current standards. The most recent audit, identifying an administrative weakness related to EU listing (see section 5.3).
13. Workshops bring together inspectors from two ONISPA sites (Nouakchott and Nouadhibou) and are conducted regularly by the ONISPA Directorate to discuss among other things, the harmonized application of regulations and procedures.

Training – Knowledge of EU requirements

14. The audit team noted that the staff met and involved in the control of fishery products was highly knowledgeable in most areas.
15. Comprehensive training information (for the period 2015 – 2018) was provided to the audit team covering laboratory analysis, compliance with technical requirements of ISO standards (including training of internal auditors), quality management systems (including objectives and performance indicators), calibration of equipment, inspection techniques, identification of parasites and hazard analysis critical control points (HACCP) principles.

Resources available to the competent authority

16. ONISPA has been given adequate resources (facilities, equipment and skilled staff) to perform official controls. Specifically, they have 111 staff, including 32 senior staff, 25 qualified (university degree or similar) technicians and 54 assistants.
17. More resources have been assigned to fisheries with 20 new staff recruited from 2018 to 2019. Five have started work and 25 are in the final stages of induction.
18. ONIPSA is assigned a budget from the State; however, with the increased costs associated with accreditation, they now supplement their resources with charges for certification and analyses performed by operators in any of their four accredited laboratories.

Documented control procedures

19. The CA activities (including inspection and quality control of fishery products) are carried out according to the procedures described in the Manual of Inspection and Quality Control Procedures for Fishery and Aquaculture Products in Mauritania. This covers procedures for inspection in establishments, sampling, supervisory activities and organoleptic control protocol for fishery products.

20. Inspectors are provided with detailed checklists (used as a basis for all reports) covering land-based processing establishments (including those producing by-products), cold stores (CS), fishing vessels, artisanal and in shore vessels, landing operations and product inspection. These are supplemented by a range of comprehensive good practice guides.

Delegation of tasks

21. There is no delegation of tasks by ONISPA.

Conclusions on competent authority

22. With regard to the recently revised CA structures and organisation, their powers, staff (independence and knowledge) and resources available, it can be concluded that they are adequate for the performance of official control tasks.
23. The correct use of their procedures would allow the CA to implement an official control system aimed at providing adequate assurances with regard to the EU requirements applicable to fishery products exported to the EU.

5.3 NATIONAL PROVISIONS AND PROCEDURES FOR LISTING ESTABLISHMENTS EXPORTING FISHERY PRODUCTS TO THE EU

Legal requirements

Article 12(1), (2) and (3) of Regulation (EC) No 854/2004.

Parts I.8., I.11. and I.28. of the EU health certificate.

Findings

24. The CA has in place national provisions and procedures for listing fishery product establishments exporting to the EU, and for updating the information included in those lists. In brief, this comprises the following steps:
- An "initial inspection" is the first on-site inspection carried out at a land-based establishment following an application by the FBO to the MPEM for approval or significant change to an existing approval (e.g. installation of a new production line or a modification to the site);
 - MPEM relay the request to ONIPSA, who arrange for an ONISPA inspection team to review the infrastructure (plans, construction and installations), equipment and HACCP plans. Following a satisfactory assessment, a conditional approval is given by MPEM (for 2 to 3 months) permitting placement of products on the local market;
 - A further inspection is carried out to check the establishment when operational and when a suitable level of compliance has been reached (by reference to the relevant checklist), a favourable technical opinion is submitted to the MPEM, resulting in a

formal request to DG Health and Food Safety to add the establishment to the EU list;

- In the event that the results of the inspection visit are unfavourable, ONISPA draws up an observation report recording the defects and submits this to the operator. A re-inspection visit may be considered after the operator has corrected the defects;
- A similar process is followed for factory and freezer vessels, following a request from the ship-owner and before the commissioning of the vessel;
- An in-depth, scheduled evaluation inspection is carried out at least annually to assess the level of compliance with the regulatory requirements for structure and operation in order to update the list of approved establishments. Since 2017 ONISPA has been changing over from a permanent approval to an approval valid for 2 years for land-based establishments and 4 years for vessels, with renewal required. This CA indicates that this process is now 90% complete.

25. During a recent external audit by TUNAC (accreditation audit of 7-9 January 2019), it was identified that on occasion, the MPEM had added establishments to Mauritania's official list which had only conditional approval. Following this finding, a working meeting was held between ONISPA and the DDVP (Directorate for the Development and Exploitation of Products) to put an end to this practice.
26. In the cold store visited, it was noted that it had a conditional approval since 18 January 2017. Subsequent inspections were carried out on the basis that it had a definitive approval, with follow up and correction of non-compliances noted.
27. A review of the current EU list identified long-standing transcription errors (cold storage facilities approved since 1996 and included on the EU list as processing plants (PP) rather than cold storage (CS))⁴
28. Primary production fishing vessels, transport means and fish markets (and associated collectors ("*Mareyeur*") who, link the artisanal fishermen and land-based processing facilities), are exempted from this listing obligation but are registered and in principle, under official control (see section 5.4).

Conclusions on national provisions and procedures for listing establishments exporting fishery products to the EU

29. The national provisions and procedures for listing establishments are comprehensive and with recent clarifications following an external audit from TUNAC, can be considered as in line with the EU requirements established in Articles 12 and 13 of Regulation (EC) No 854/2004.
30. Current inspection and administrative arrangements do not preclude the EU listing of CS as PP.

⁴ In their response to the draft report the CA noted that this confusion will be removed when the official list of approved establishments is updated.

5.4 OFFICIAL CONTROLS OF PRODUCTION AND PLACING ON THE MARKET

Legal requirements

Article 11(4) and 12(2) of Regulation (EC) No 854/2004.

Article 46(1)(g) and (h) of Regulation (EC) No 882/2004.

Point II.1 of the EU health certificate, and in particular the controls laid down in Annex III, Chapter I of Regulation (EC) No 854/2004.

Findings

5.4.1 Official control system in place

31. The official control system in place covers the entire production chain with the exception of artisanal vessels. Since the termination of the ONISPA control strategy in 2016, they rely entirely on auto-controls carried out by processing plants on their documented list of suppliers. In the example checked, not all vessels had been inspected by the FBO with the rationale that they focussed on the vessels supplying larger volumes of fish.
32. Inspection visits are arranged under an annual work schedule prepared by ONIPSA HQ using dedicated checklists (for both land-based establishments and all categories of vessels) and includes a product and water/ice sampling plan. ONISPA has initiated the introduction of "tablets", to facilitate transfer of information to the central database. The types of inspection include:
 - Initial inspection following application for approval or significant changes to an approved PP (See section 5.3);
 - Routine inspections using relevant checklists (unfavourable result or suspension, communicated to MPEM, Wali Dakhlet Nouadhibou, SMCP and FNP). For Factory Vessels and Freezer Vessels these are carried out at each landing. In-shore vessels are scheduled for inspection each month;
 - Follow up inspections where significant non-compliances have been identified;
 - In-depth evaluations (summary report of results sent to ONIPSA HQ), carried out at least once per year to update the list of approved establishments and includes all fishing vessels with the exception of artisanal vessels;
 - Pre-export inspections which include certain obligatory checks (see section 5.4.2.). A dedicated unit at Nouakchott airport inspects all export consignments of chilled product immediately prior to loading.
33. During these visits, random organoleptic checks are to be carried out at all stages of production, processing and distribution strictly according to EU marketing standards laid down in Regulation (EU) No. 2406/96. Where checked, the inspection frequencies were respected and fish found generally to be of excellent quality.

34. In brief, official sampling and analyses occurs under the annual plan at a minimum frequency of twice per year for processing plants and landed products. This frequency, combined with pre-export, own-checks and checks on product from Member State vessels results in approximately 12 000 samples being checked per year in one of the four laboratories in the accredited network.
35. This sampling data is supplemented by a) a baseline study conducted by *Institut Mauritanien de Recherches Océanographiques et des Pêches* (IMROP) from 2012 to 2016 covering marine water, sediment and fish and b) annual updates thereafter. Results for contaminants have been consistently low.

Primary production fishing vessels and landing operations

36. Artisanal vessels and associated landing area (open beach, Nouakchott): The audit team noted the hygienic landing from three randomly selected (registered) artisanal vessels that landed fishery products in a hygienic way using insulated boxes adequately filled with ice. The box was immediately transported by waiting stainless steel cart to the fish market.
37. ONISPA is actively promoting the introduction of new small vessels with cabin and basic hygiene facilities to replace artisanal vessels supplying fishery products for export to the EU.
38. Coast Guard officials may check these vessels at random upon departure, or more commonly during landing to ensure registration of both vessel and operators. In principle, only such registered vessels can appear on the FBO supply list for EU export.
39. Ports: There are two ports from which fishery products are exported to the EU – a) the autonomous Port of Nouakchott - Port of Friendship (PAN-PA) and b) the autonomous Port of Nouadhibou (PAN).
40. For the PAN (the main port for EU exports), the audit team noted that it had a dedicated area with access controlled by police and customs. It is designed and managed to permit unloading of fishery products from vessels (both factory and freezer vessels) to awaiting refrigerated transport vehicles in a hygienic way and in the case of Refrigerated Sea Water vessels, direct to adjacent processing premises by pipe.
41. A new port is scheduled to enter operation at Tanit, near Nouakchott, later this year. It will be the second port equipped to accept artisanal vessels (i.e. < 15 metres in length) in Mauritania. It has 500 metres of landing area, including purpose built floating pontoons for smaller vessels. It has an associated desalination plant to supply 1000 tonnes of fresh water per day, ice making capacity (45 tonnes per day), and comprises a purpose built covered market that has yet to be approved by ONISPA.
42. Fish (wholesale) markets: there are two markets from which fish products for export to the EU are handled: a) the Bay of Repos Port Facility (EPBR) in Nouadhibou and b) the Nouakchott Fish Market (MPN). The fishery products are channelled to these two sites by registered collectors, subject to triage (i.e. selection of fish eligible for the EU market,

local market or for use as by-products/waste) and onward delivery (with/without) temporary storage with varying quantities of ice in lockable rooms attached to the market.

43. In one such room, unidentified fish was stored in damaged plastic crates with inadequate or no ice coverage (fish temperature of 15°C noted), which is not in accordance with Point A(1), Chapter III, Section VIII of Regulation (EC) No 853/2004⁵.
44. The audit team noted significant longstanding, intractable significant shortcomings in both fish markets visited (related to structure, hygiene, traceability of product etc.) and as a consequence, did not comply with key requirements of Regulations (EC) Nos 852/2004 and 853/2004. These findings were also identified by ONISPA in their comprehensive reports.
45. The CA acknowledges that they wait for the completion of the new port and market at Tanit and construction of upgraded market facilities at Nouadhibou to remedy the situation.
46. The registered collectors (approximately 100 in total) may work directly for an EU listed establishment, or supply on their own account, either direct or via registered suppliers ("*fournisseur*") that have their own contracts with approved FBOs to process fishery products on their behalf. There were no records available to demonstrate they had checked the hygiene conditions of the artisanal vessels providing the fishery products to them.

Facilities, including vessels, handling fishery products

47. The audit team visited nine EU listed land-based establishments. The audit team noted that official control staff was present regularly (319 controls in 2018), that official controls and oversight tasks (routine, in-depth, follow up and pre-export inspections for certification and official sampling) were carried out at the stipulated frequencies, using dedicated check lists and EU health certificates issued as described in section 5.7.
48. In general, the sampling plans for testing products, water and ice drafted in the framework of the FBO pre-requisite (own-check) programmes were in line with EU rules, and applied satisfactorily. Own-checks analyses are typically conducted at one of the four accredited ONISPA laboratories under contract. In summary the routine establishment checks include:
 - Water/Ice – every 2 months for total coliforms, E.coli and streptococci. To note, potable water is chlorinated and obtained from the public supply network. For cleaning and disinfection, FBOs typically use salt water obtained from wells that must meet minimum requirements for depth and water quality;
 - Fish – routine organoleptic checks and at least annual checks for heavy metals (Lead, Cadmium and Mercury) with the selection of fish more susceptible to contamination (e.g. fish living near the seabed);

⁵ In their response to the draft report the CA noted that the temperature recording was for a large fish that had just been landed and, consequently, an isolated case. They drew attention to observation No. 53 and text “the audit team generally noted that fish had excellent organoleptic characteristics and were typically stored under ice”.

- Final product – regular microbiology, including total cell count (FMAT ISO 48331 – 1:2003).
49. One EU listed facility did not comply with the relevant hygiene standards for the room used to carry out filleting operations. ONIPSA promptly restricted the approved activities (i.e. it removed filleting from the activities that could be performed).
50. Of the remaining eight land-based establishments, three were broadly compliant using modern wall and floor materials that are easy to clean and maintain. Five establishments were partially compliant, typically due to the HACCP plan being poorly adapted (see paragraph 51.) to the actual operations or structures, which ONISPA acknowledge require upgrading to a greater or lesser extent. The following points were regular findings, also noted by ONISPA:
- Damage to walls, floors and ceilings or flaking paint making surfaces difficult to clean.
51. The following points were identified sporadically and not typically noted by ONISPA:
- Incomplete ducting of waste water from refrigeration units;
 - Flaked ice storage allows direct contact with workers' footwear. Associated roof condensation due to regular opening of door for access of personnel.
52. Where checked in-depth (three cases in land-based establishments), the facilities visited, did not comply with one or more key requirements of Regulations (EC) No 852/2004 in relation to HACCP and this had not been noted during ONISPA inspection visits. In brief:
- Flow diagrams did not fully reflect the process(es) accurately;
 - Reception temperatures cited at a range of temperatures above 4°C and not a temperature approaching that of melting ice;
 - Critical control points not identified or limits not set. Operator unaware of their own critical limits;
 - HACCP records unavailable, due to the fact that the plan was not adapted to the operations performed.
53. In relation to operational hygiene, the audit team generally noted that fish had excellent organoleptic characteristics and were typically stored under ice. For frozen product, where checked, all frozen fish was at -18°C or below according to both FBO and ONISPA calibrated thermometers.
54. The traceability exercises did not allow ONISPA and FBOs to demonstrate in a consistent way (as foreseen in Article 18 of Regulation (EC) No 178/2002) the maintenance of the relevant information at various steps in the production chain, or within an establishment exporting large volumes of frozen octopus supplied by artisanal vessels through independent collectors. Challenges relate to the fact that details of fishery products from artisanal vessels are not officially recorded at the time of landing but on reception at the

establishments⁶. In addition, fishery products typically pass via a large number of collectors, either directly or indirectly to the processing plant (see paragraph 44.).

55. Factory and freezer vessels: Since 2015, more than 15 new freezer vessels have been approved. Moreover, in 2019 the competent authority suspended the approval of 25 freezer vessels (these vessels were confined to port until shortcomings were corrected).
56. The two freezer vessels visited (one proposed for listing) were broadly satisfactory with regard to construction, maintenance, equipment and operational hygiene. Frozen products were stored well below -18°C and this was associated with continuous temperature records.
57. One factory vessel did not comply with the relevant standards and this had not been identified in the inspection reports. ONISPA suspended activity pending the provision of an updated HACCP plan. The plan available dated back to 2006 when the vessel was listed as a freezer vessel. It was not adapted to the current activities including the use of undocumented, albeit authorised additives.
58. The audit team visited the Coast Guard (GCM) and observed the measures put in place for the monitoring, control and surveillance of the Mauritanian EEZ. This includes tracking by satellite of all Mauritanian fishing vessels > 15M and the introduction of electronic catch reporting. This initiative has been undertaken to coincide with new port infrastructure, as seen at Tanit (see paragraph 41.).

Checks on the EU eligibility of imported raw materials

59. There are currently no imports of raw materials used for the manufacture of products for EU export and fishery products from EU vessels are transferred to transport vehicles for onward transit to the EU with a “transfer certificate” (Commission Regulation (EU) 2017/1973).

Conclusions on official controls of production and placing on the market

60. Official controls cover the entire production chain for fishery products destined for the EU, with the exception (since 2016) of artisanal vessels. These controls are generally carried out in accordance with the applicable procedures, are arranged under an annual work programme and overall are in line with EU requirements.
61. However, the system implemented to control EU-listed facilities was found to be insufficiently effective in some areas, as evidenced by a) the weak assessment and enforcement of implementation of HACCP plans, which is not in accordance with point

⁶ Limited traceability data is available for exported chilled product as in these cases; national rules require the fish market of origin to be reimbursed taxes for itemised and weighed fish identified in the export certificate. This information is obtained from a written record maintained by the collector in duplicate (one copy for their records and the other for the supplying fisherman). Where collectors are employed directly by an EU listed establishment, this record may be available for review either at the FBO premises, their lockable room at the market (see paragraph 42.) or as a copy contained within the relevant export certification file (see paragraph 32., last bullet).

1.(b).(i) of Chapter I of Annex III of Regulation (EC) No 854/2004 and b) the continued use of two fish markets and associated rooms, which do not operate to the required standards nor reliably maintain fish at the required temperature⁷.

62. Traceability, particularly when it relates to large export consignments with fishery products originating from artisanal vessels, cannot be assured.
63. These shortcomings undermine the reliability of the guarantees provided, and attested to by the CA, that fishery products exported to the EU were produced in EU compliant establishments and in accordance with the EU rules, particularly when sourced from artisanal vessels supplying their fishery products via either of the two markets.

5.4.2 Official controls of fishery products

Legal requirements

Point II.1 of the EU health certificate, and in particular official controls laid down in Annex III, Chapter II of Regulation (EC) No 854/2004.

Findings

64. The official controls of fishery products are carried out in accordance with competent authority procedures (i.e. at the prescribed frequency during the inspection and pre-export visits).

Organoleptic examination

65. Organoleptic checks of wild caught fishery products are conducted routinely during landing of vessels > 15 metres in length. In relation to artisanal vessels, these checks are performed when the insulated boxes are deposited in the fish market located immediately adjacent to the landing site (section of clean beach).

Freshness indicators

66. Tests for total volatile basic nitrogen (TVB-N) are taken sporadically. In total, 71 samples were taken in 2017 and 56 in 2018; all compliant.

Histamine

67. Histamine testing is obligatory (based on a circular dated 15 August 2007) for all landed fish of relevant "scombroid" fish species (e.g. anchovies and tuna). Operators are aware that export certification will not be completed until satisfactory results (from the requisite

⁷ In their response to the draft report ONISPA noted that they had organised several training sessions on the assessment of HACCP plans, in the context of upgrading the skills of inspection staff. This training focuses on HACCP and the approval of HACCP manuals in fishery products processing plants. These training sessions have allowed ONISPA to a) establish a procedure for the approval of HACCP manuals, b) draw up an HACCP manual evaluation grid and c) analyse certain establishments' HACCP manuals with a view to their approval.

nine sample units) have been reported by the laboratory. All results observed by the audit team (for fish landed from freezer vessels) were well below EU limits.

Residues and contaminants

68. Mauritania does not export any aquaculture products and as a consequence is not in the list of the Annex to Commission Decision 2011/163/EU as having an approved monitoring plan. Nonetheless, their annual monitoring plan includes samples taken at establishment level for heavy metals (lead, cadmium and mercury) and pesticide residues. Dioxins and polychlorinated biphenyls (PCBs) are tested annually in an accredited overseas laboratory in the EU. No smoked products are exported; however, a test was made for benzo (a) pyrene in 2018. All the results seen were compliant; ONISPA commenting that this is consistent (i.e. low contaminant levels) with studies conducted by IMROP.
69. For the additive meta-bisulphite, a limit of 50 mg/kg is set for the edible part (i.e. lower than maximum EU limits) and ONISPA reported that all landings of crustaceans and crab are tested.
70. FBO own-check analyses provide further data, as any results above relevant limits are automatically relayed to ONISPA.

Microbiological checks and parasites

71. When deemed necessary, the CA can undertake microbiological checks (240 in 2017 and 226 in 2018) in fishery products for a range of parameters (e.g. total coliforms and aerobic mesophilic bacteria) and usually conduct an organoleptic and, to a lesser extent, a parasite check at the same time.

Official control on water and ice

72. Official controls are undertaken in establishments (including the fish markets) twice per year for microbiology (E. coli, total coliforms, enterococci and enumeration of culturable micro-organisms).

Official controls of fishery products

73. The official controls of fishery products destined for EU export cover the relevant EU requirements and, in general, offer sufficient assurances that fishery products exported to the EU comply with the relevant EU rules.

5.5 FOLLOW UP OF RASFF NOTIFICATIONS

Legal requirements

Article 11(4) of Regulation (EC) No 854/2004.

Findings

74. Investigations following a RASFF notification have to be carried out including an inspection of the establishment (physical and documentary) and official analyses performed where appropriate. ONISPA staff are notified automatically when an alert is generated.
75. ONISPA highlighted the fact that most RASFF relate to rupture of the cold chain during transport and additional requirements are to be introduced to ensure improved temperature control in transport vehicles (see paragraph 4.). In brief, a satisfactory technical assessment of such vehicles would be required from ONISPA before approval could be given by the Ministry of Transport and the authorities responsible for the port "Free Zone".
76. The audit team reviewed a number of RASFF notifications in detail. In one particular instance related to elevated cadmium in live lobster, ONISPA suspended harvesting for a year while investigations were made. According to ONISPA, this was found after an extensive investigation to be an isolated incident (locally harvested crustaceans historically have low levels of heavy metals).

Conclusion on follow up of RASFF Notifications

77. There are adequate procedures in place for follow-up of RASFF notifications by ONISPA.

5.6 LABORATORIES

Legal requirements

Article 46(1)(d) of Regulation (EC) No 882/2004.

Chapter 1 of Annex I to Regulation (EC) No 2073/2005.

Regulations (EC) No 333/2007 and (EU) No 589/2014.

Findings

78. The audit did not focus on laboratory performance; however, a visit to the two ONISPA laboratories located at SIS (Nouakchott) was included in the itinerary. The audit team noted well equipped facilities with ample space to allow progress of anonymised samples with limited risk of cross-contamination.
79. Since 2013, the ONISPA laboratory network, comprising four laboratories at two locations (covering both chemistry and microbiology) has been accredited ISO 17025, valid until November 2020.

80. In an ongoing process since initial accreditation, the scope of accreditation has been progressively enlarged, such that only analyses for dioxin and PCBs are outsourced to an accredited laboratory in Europe.
81. Laboratories participate regularly in proficiency testing with (according to data provided by the ONISPA in response to the pre-audit questionnaire) satisfactory results for 2016 to date.
82. Test methods for lead and histamine have been validated (with good Proficiency Testing results for lead in 2018) and are in the process of being included within the scope of accreditation⁸.

Conclusion on laboratories

83. The laboratory available to the CAs for their official analyses is accredited to EN ISO/IEC 17025 (scope of accreditation under continuous expansion) and follows EU reference methods or internationally recognised methods for the parameters tested.
84. At present there are two gaps in relation to the scope of accreditation (histamine and lead) which are being addressed.

5.7 OFFICIAL CERTIFICATION

Legal requirements

Article 14 of Regulation (EC) No 854/2004.

Article 6 of Regulation (EC) No 2074/2005, and in particular the EU health certificate.

Article 6 of Council Directive 96/93/EC.

Findings

Issuance of EU export certificates

85. The export certification has been conducted via TRACES since June 2017 and includes a pre-export consignment check (physical, documentary and when relevant, testing of product) before approval in the system.
86. Exports of frozen fishery products are co-ordinated by the state body SMCP. In brief, one of the three cold stores receives FBO product on the basis of a "*Bon De Transport*" itemising the number of carton boxes, origin and date. When an export is sought by the FBO, SMCP issue a "*Note d'Embarquement*" to ONISPA. ONISPA then carry out an "*Inspection de Poisson Congelé*". Following a satisfactory inspection, SMCP enter relevant data in TRACES and submit a "*Demande de Certification*". Before issuing the

⁸ In their response to the draft report the CA noted that the results of proficiency tests for lead and histamine have been obtained over recent years, and these two parameters will be included in the scope of accreditation of the ONISPA laboratories for 2020.

certificate in TRACES, ONISPA verifies the data and checks the related inspection report. For chilled product transported by air, the request for export is submitted directly to ONISPA by the FBO and the pre-export check is done just prior to loading.

87. A review of TRACES data indicated that while almost all fish oil was exported (correctly) as destined for animal feed, 13 consignments were sent for "human consumption" between 2016 to 2019 (to date). ONISPA confirmed that these were samples of small volume (0.5 to 5.0 litres), sent by air and typically destined for food exhibitions and had not been certified by them. In the examples checked, the consignments had been refused entry at the relevant border inspection post.

Issuance of Certificates for fishery products caught by member state vessels

88. Following the amendment of Regulation (EC) No 2074/2005 by Regulation (EU) 2017/1973, ONISPA has been issuing certificates for fishery products from European Union vessels that are transferred in Mauritania and typically transported by refrigerated road transport via Morocco and into the EU via Spain. These consignments are subject to the same official controls and testing as undertaken for Mauritanian product.
89. ONISPA stated that they generated these certificates outside TRACES as they could not enter relevant data for non-Mauritanian flagged vessels. In the absence of this information, ONISPA provided figures to the audit team to show that in 2018, European flagged vessels (mainly Spanish), transferred 16 165 tonnes of fishery products. Large volumes of pelagic fish are landed (without transfer) into Mauritania – approximately 125 000 tonnes.

Checks on-the-spot of EU export certification of products exported to the EU

90. The audit team undertook a number of traceability exercises and reviewed several examples of health certificates and considered them to be adequately filled in. However, the traceability exercises did not allow in all cases the competent authority and FBOs to demonstrate in a consistent way the maintenance of the relevant information throughout the production chain (see also paragraph 54. and associated footnote).

Conclusions on certification

91. Export certification procedures (including the issue of "transfer" certificates for products from EU vessels) and their implementation can provide adequate assurance that EU certification principles are correctly applied. However, the guarantees are not reliably substantiated, particularly when fish is supplied by artisanal vessels via the fish markets and associated collectors.

6 OVERALL CONCLUSIONS

There have been many improvements since the audit in 2011, including accreditation of ONISPA inspection activities, their laboratory network, upgrading of the national fleet of

freezer vessels and the adoption of TRACES. ONISPA has also identified areas for improvement, and for which structural measures are being taken.

The official control system is based on EU-aligned legislation and comprehensive documented procedures, checklists and good practice guides. These, along with internal audit procedures, rotation/exchange of inspectors and accreditation, ensure that controls are implemented according to planned frequencies and in a consistent way.

It covers the entire production chain with the exception of artisanal vessels, which since the termination of the CA control strategy in 2016, relies on inconsistent FBO auto-controls. In general, official controls identified relevant findings and ensured follow up. However, during the review of HACCP plans, inspectors did not reliably identify if they were fully adapted to the processing activities, nor verify traceability in all cases. For the fish markets, the control reports show that alternative premises or arrangements (e.g. direct supply of fishery products from artisanal vessels to processing facilities) are required.

The shortcomings identified impact to some extent on the ability of the competent authority to provide consistently, and in full, the guarantees required by the EU health certificate when exporting fishery products to the EU.

7 CLOSING MEETING

At the closing meeting held in Nouakchott on 25 October, the audit team presented the main findings and preliminary conclusions of the audit. The CAs acknowledged the audit findings, and undertook to take comprehensive action where relevant for all things "big or small".

8 RECOMMENDATIONS

No.	Recommendation
1.	<p>The competent authority should ensure that the EU list correctly identifies cold storage facilities and it is kept up-to-date, as required by Article 12 (1) of Regulation (EC) No 854/2004.</p> <p><i>Recommendation based on conclusion No 58</i></p> <p><i>Associated findings No 43</i></p>
2.	<p>The competent authority should ensure that the official control system put in place is implemented effectively; in particular, they should ensure that all official control staff are adequately trained on the assessment and implementation of HACCP in order to be able to provide the necessary assurances that fishery products fully comply with the standards required to meet all guarantees as set out in the EU health certificate for imports of fishery products contained in Appendix IV of Annex VI to Regulation (EC) No 2074/2005.</p> <p><i>Recommendation based on conclusion No 61</i></p> <p><i>Associated findings Nos 52 and 57</i></p>
3.	<p>The competent authority should take measures to ensure that the relevant EU standards are applied to the fish markets involved in the production chain of fishery products for EU export, including the temperature requirements of chilled fish in Chapter III (A)(1) of Section VIII of Annex III to Regulation (EC) No 853/2004.</p> <p><i>Recommendation based on conclusion Nos 61 and 63</i></p> <p><i>Associated findings Nos 42 and 43</i></p>
4.	<p>The competent authority should maintain the progress noted to date within the laboratory network, particularly with regard to ongoing expansion of the scope (i.e. lead and histamine) of accreditation.</p> <p><i>Recommendation based on conclusion No 84</i></p> <p><i>Associated findings No 82</i></p>
5.	<p>The competent authority should ensure that fishery products to be certified for export should be traceable at all stages of production, processing and distribution as foreseen in Article 18 of Regulation (EC) No 178/2002.</p> <p><i>Recommendation based on conclusion Nos 62 and 91</i></p> <p><i>Associated findings Nos 54 and 90</i></p>

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

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2019-6691

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Dec. 2006/766/EC	OJ L 320, 18.11.2006, p. 53-57	2006/766/EC: Commission Decision of 6 November 2006 establishing the lists of third countries and territories from which imports of bivalve molluscs, echinoderms, tunicates, marine gastropods and fishery products are permitted
Dec. 2011/163/EU	OJ L 70, 17.3.2011, p. 40-46	2011/163/EU: Commission Decision of 16 March 2011 on the approval of plans submitted by third countries in accordance with Article 29 of Council Directive 96/23/EC
Dir. 96/23/EC	OJ L 125, 23.5.1996, p. 10-32	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
Reg. 2406/96	OJ L 334, 23.12.1996, p. 1-15	Council Regulation (EC) No 2406/96 of 26 November 1996 laying down common marketing standards for certain fishery products
Dir. 98/83/EC	OJ L 330, 5.12.1998, p. 32-54	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin

Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 1881/2006	OJ L 364, 20.12.2006, p. 5-24	Commission Regulation (EC) No 1881/2006 of 19 December 2006 setting maximum levels for certain contaminants in foodstuffs
Reg. 333/2007	OJ L 88, 29.3.2007, p. 29-38	Commission Regulation (EC) No 333/2007 of 28 March 2007 laying down the methods of sampling and analysis for the control of the levels of trace elements and processing contaminants in foodstuffs
Reg. 1333/2008	OJ L 354, 31.12.2008, p. 16-33	Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives
Reg. 2017/644	OJ L 92, 6.4.2017, p. 9-34	Commission Regulation (EU) 2017/644 of 5 April 2017 laying down methods of sampling and analysis for the control of levels of dioxins, dioxin-like PCBs and non-dioxin-like PCBs in certain foodstuffs and repealing Regulation (EU) No 589/2014