

# **INTERNATIONAL ASSOCIATION OF FISH INSPECTORS (IAFI)**



Professionals for a Safe and Sustainable Global Seafood Supply

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## **UN OCEANS Conference**

### **Position Paper on Interactive Dialogue: Making fisheries sustainable and providing access for small-scale artisanal fishers to marine resources and markets**

#### ***Introduction***

IAFI is the International Association of Fish Inspectors. We represent professional interests in ensuring that the fishery and aquaculture supply chain delivers safe and good quality products to consumers, thus contributing to societal food security.

#### ***IAFI Intervention***

IAFI calls on the conference to urge Member States to pay greater attention to addressing structural deficiencies in the value chain for fishery and aquaculture products, so as to reduce the risk of unsafe and low-quality products being placed on the market and ensure equitable application of controls. In particular the following steps are recommended:

- 1. Ensure appropriate and proportionate application of non-tariff barriers*

Aquatic food business operators in developing countries have a harder task in meeting regulatory requirements with regard to SPS (Sanitary and Phytosanitary) and IUU catch certification conditions. Due to compliance failures, several MS with important resources exploited by SSF are unable to access profitable global markets. To minimise impacts where SSF are concerned, importing countries should ensure that the measures are appropriate, relevant and proportionate to the risks.

Informal regional trade in products of small-scale fisheries contributes significantly to food security and livelihoods. As developing countries successfully strengthen the management of their SPS conditions, the application of such standards without considering the capacity of small-scale operators to comply runs, a high risk of limiting traditional trade flows for example across land borders in Africa with negative impacts for livelihoods and food security.

IAFI therefore calls for strengthening the capacities of developing countries in managing SPS risks, and deliver relevant incentives (grants, loans) and tools (regulatory exemption, derogations) to manage regulatory impacts and potentially conflicting demands for better livelihoods and safer foods.

### *Improve management of food safety risks from aquatic products*

Ensuring safety of traditional food processes is an ongoing challenge, as better scientific risk assessment delivers improved knowledge of harm from unsafe food. The consumer health impacts of consumption of artisanally produced smoked-dried fish products, are considerable. The process introduces highly carcinogenic polycyclic aromatic hydrocarbons (PAH). Governments of many developing countries which rely on these products for food security and sustainable livelihoods have so far remained silent about these risks. This omission causes ongoing, unquantified but most likely significant harm to their national consumers and undermines the nutritional benefits of fish consumption.

A regulatory response may not be feasible in many countries. However there are other ways to manage this risk. In countries dependent on these processes, governments are recommended to adopt steps to inform consumers of the risks inherent with the consumption of these popular products and promote the adoption of safer appropriate technology smoking kilns.

### *Develop grant and loan schemes for value chain investments geared to small scale operators*

The SSF Sector in developing countries is rarely sufficiently invested, especially concerning processing distribution infrastructure. Private sector finance is difficult to obtain and public investment in infrastructure remains highly constrained, mostly limited to ad hoc donor activity. Communities also lack relevant business planning skills and organisation. Almost all of the private investment in SSF that is made is generated from revenues, and directed at increasing extractive capacity (boats, gear and engines). Much higher levels of investment are required in the downstream value chain to increase value added through better preservation, safety and quality. Developing countries and donors are encouraged to adopt matching grant and subsidy schemes for sustainable SSF investments (excluding increased extractive capacity such as vessels, gear and motors).

### *Strengthen stakeholder organisations to act as representatives and service providers to small scale operators*

Typically, SSF communities are remotely located from the main centres of population, comprise an ethnic minority and lack civil organisation. They struggle to get their voice heard. Strong associations representing stakeholder interests can do much more both to ensure political representation and delivery of services to members. Fishers and fish processors have potentially conflicting, albeit valid, interests which need to be reflected in different positions, requiring different representative organisations.

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