

EU-regelverk om produksjon av fiskeolje til humant konsum

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Definition fish oil

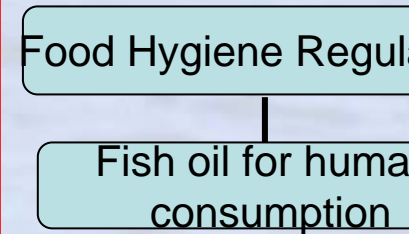
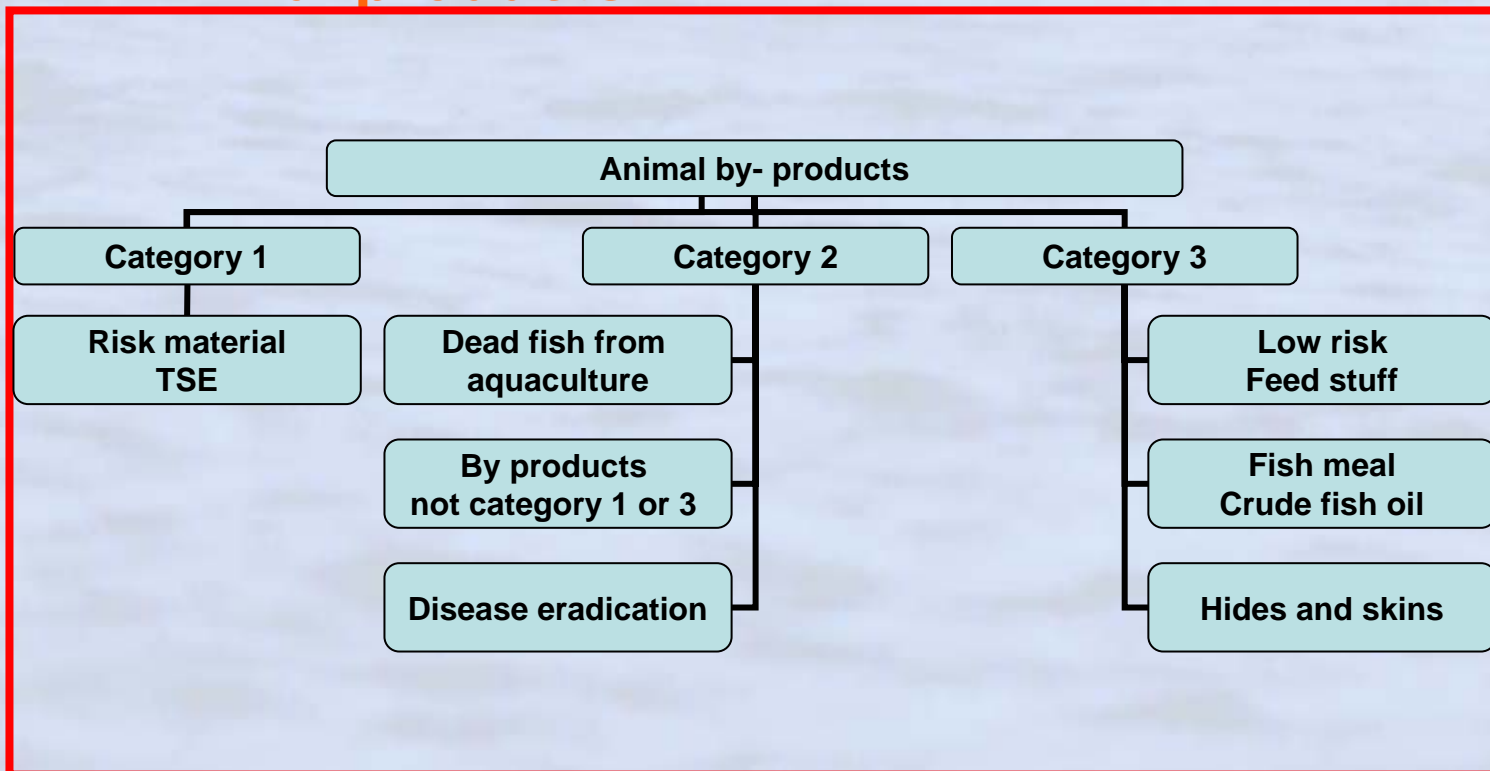
- Fish oil that is processed from fresh raw fish, by the use of temperature and different processing steps to separate fish oil from the protein and water fraction.
- When necessary, the fish oil has to undergo further processing, refinement, and purifying before it can be placed on the market according to the hygiene requirements.

BIPRODUKTER

RESTRÅSTOFF

Animal products

Human consumption



A small step from feed to food



Crude fish oil for feed
Approved according to animal by-products regulation, HACCP and GMP+

Food Hygiene for Fish oils

- Regulation (EC) No 1662 /2006 specific hygiene rules for food of animal origin
- Commission Regulation (EC) No 1020/2008 amending Annexes II and III to Regulation (EC) No 853/2004 as regards identification marking, raw milk and dairy products, eggs and eggs products and certain fishery products.
- Commission Regulation (EC) No 1022/2008 amending Regulation (EC) No 2074/2005 as regard the total volatile basic nitrogen (TVB- N) limits
- Commission Regulation (EC) No 1023/2008 amending Regulation (EC) No 2076/2005 as regard the extension of the transitional period granted to food business operators importing fish oil intended for human consumption.

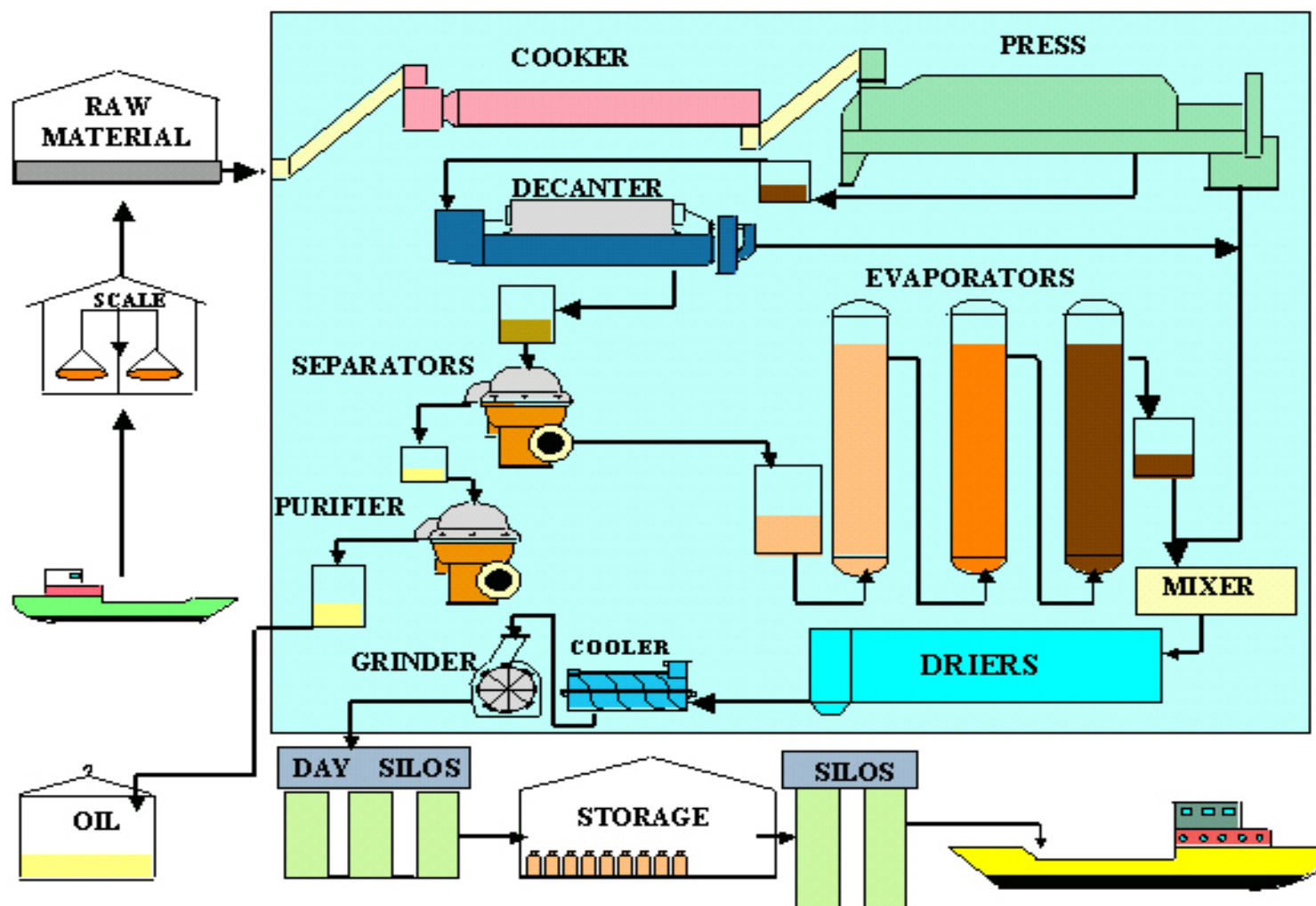
Catch/landing

- Regulation (EC) No 853/2004 Annex III, section VIII, chapter IV B and.....

Raw materials used in the preparation of fish oils for human consumption must:

- Come from registered vessels in a national register
- The raw material must be transported and stored under hygienic conditions
- the raw materials has to derive from fishery products fit for human consumption

Come from approved establishments but Only the fish oil part to be approved



Primary production/ catch

The raw material for fish oil production has to:

- **Landing within 24 hours:**
 - The fish has to be protected from contamination and the catch must be landed as soon as possible.
- **Landing after 24 hours**
 - For vessels that do not land the catch within 24 hours, in addition it is required that the fish is chilled.
 - However, by way of **derogation** the food business operator may refrain from chilling the fishery products, when **whole fishery** products are used directly in the preparation of fish oil for human consumption, and the raw material is processed within **36 hours** after the catch, provided that the freshness criteria laid down are met.

Raw material

- Regulation (EC) No 853/2004 Annex II, section VIII chapter IV part B:
 - The raw material for fish oil production must derive from fishery products fit for human consumption
 - The freshness criteria are based on the total volatile basic nitrogen (TVB-N), which shall not exceed 60 mg of nitrogen/100 g of whole fishery products used directly for the preparation of fish oil for human consumption
 - However, where the raw material is still fit for human consumption the competent authority may set limits at a higher level for certain species

Storage

- Regulation (EC) No 853/2004 Annex III, section VIII, chapter IV B
- 3) Provided that the raw material and the production process comply with the hygiene requirements for fish oil intended for human consumption, **both fish oil intended for human consumption and fish oil and fishmeal not intended for human consumption, may be stored in the same establishment.**

Transitional period

- During the transitional period, now extended until 30 April 2009, food business operators in Member States may continue to import fish oil from establishments in third countries under the regimes that were in place in that Member State prior to requirements for fish oil being included in the hygiene Regulations.
- Consignments of fish oil accompanied by such a certificate completed and signed prior to 30 April 2009 may be imported into a Member State of the Community until 30 June 2009.

Export to EU after 31. April 2009

- Export country listed
- Registration of vessels
 - But no listing of vessels that do not export
- Approval of establishments
- Listing of establishments
- Health certificate

Summary of victories:

1. Derogation, extention of the regulation until April 31st 2009
1. Defintion of fishoil, no requirements for further purifying (salmonoil)
2. Only the fish oil part of the production to be approved
3. The freshnes criteria are defined as TVN (60...)
4. The competent authority may set limits at a higher level at certain species
5. Derogation (36h) of 24 hours storage before treatment
6. Storage of food- and feed fish oil and fish meal at the same site

Så for å summere:

- Fisken må levers av en båt som er registrert i et nasjonalt register
- Fisken må være fit for human consumption
- Fisken må ha en TVN verdi under 60
- Fisken må levres innen 24 timer og prosesseres innen 36 timer
- Fiskeolje produksjonen må godkjennes av de lokale myndigheter
- Fiskeoljen må lagres på egne godkjente lagertanker

Forutsetning for arbeidet i MARING:

- Sikre størst mulig fleksibilitet i produksjon av fiskeolje
- Sikre at Norge vil kunne fortsatt være en autoritet på prosessering/rensing av fiskeolje
 - Sikre videreføring av eksisterende produksjonsprosesser for lakseolje, tran, kaldpressede oljer, osv
 - Sikre nødvendig tilgang av egnet råstoff (fra 3dde land) for prosessindustrien i Norge (de som renser råolje til kosttilskudd)
 - Og dermed sikre at verdiskapningen skjer i Norge/EU og ikke i USU/Canada og eller i Latin-Amerika

Hva har vi oppnådd:

- Bidratt til å opprettholde innarbeidet praksis i næringen
- Bidratt til fleksibilitet
- Gitt spillerom både for eksisterende produksjons- prinsipper og videre prosessutvikling

Videre arbeid:

1. FHL-Maring har utarbeidet forslag til guidelines (2007) for å lette forståelsen av EU kravene for tredje land
 - kvalitetssikret guidelines i Norge/Peru/Marokko/UK
 - Vi har fått bekreftet at det er liten kvalitetsforbedring som skal til for de fleste produsenter
 - Peru, Marokko og Norge er i gang med å tilrettelegge produksjonen etter FHL-Marings Guidelines
2. Diskutert prinsippene for guidelines med EU Kommisjonen som har benyttet denne i tilretteleggelse av lovverket
3. Tatt initiativ til å få FSA/UK til å adaptere FHL-Marings Guideline som Draft National Guidelines