



U.O.C. SANITÀ PUBBLICA
Istituto per la Sicurezza Sociale

Object: Your note N ° ΦC-HB-7/14926 dated 13/06/2019

Dear Dr. Vlasov,

The Veterinary Health and Food Hygiene Operating Unit of the Prevention Department of the Republic of San Marino offers you the acts of its consideration and, in response to your note N ° ΦC-HB-7/14926 dated 13/06/2019 receipt on 12 / 07/2019, informs you of the following:

The Republic of San Marino pursuant to Decision n. 1/94 of the EC-San Marino Cooperation Committee of June 28, 1994, has adopted and applies the EU legislation on veterinary matters.

With the Decision n. 1/2010 "Omnibus" of the EU-San Marino Co-operation Committee of 29 March 2010, various measures have been established for the implementation of the Cooperation and Customs Union Agreement between the European Economic Community and the Republic of San Marino.

Following this, the Republic of San Marino has delegated the European Union, specifically Italy, to carry out veterinary checks on live animals, also for the verification of their welfare, and on products of animal origin from third countries and destined for the EU market or transit to other third countries through the so-called PIF (Border Inspection Posts).

The national PIFs are peripheral offices of the Ministry of Health and at the same time, they are part of the PIF network of the European Union (EU). They are authorized by the European Commission.

Furthermore, the PIFs carry out an important and delicate task of technical and operational support to the Customs Offices for countering the illegal trade in products and animals. This task is essential to avoid the introduction of food at risk or highly contagious diseases for animals or humans (foot and mouth disease, avian influenza, rabies and other pathogens).

The PIFs are coordinated by the Directorate General of Animal Health and Veterinary Drugs (DGSAF) of the Italian Ministry of Health.

The methods of control carried out by them have been established by Council directives n. 97/78 / EC and 97/79 / EC.

The importation of fishery products is allowed only:

1. from Third Countries included in the list, Annex II, of Dec.2006 / 766 / CE (as last amended with the limitations specified therein, (see notes to annexes I and II); with the repeal of Regulation 2076 / 2005 by Regulation (EC) No. 1162/2009, lists of third countries authorized to export to individual Member States on a bilateral basis are no longer in force. From 1 January 2010 the import of fish products is to be considered completely harmonized;

2. from establishments included in the community lists available through the link:
https://webgate.ec.europa.eu/sanco/traces/output/non_eu_listsPerActivity_it.htm

(see Delegated Decree no. 71 of June 29, 2012 "Specific rules on hygiene for food of animal origin" which implemented EC Regulation 853/2004)

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3. taking into account the restrictive measures deriving from Community notifications or from safeguard clauses or special import measures

4. from 26/11/2012 the Regulation (EU) No. 1012/2012 (amendment of Reg (CE) 2074/2005) establishes a new model of health certificate,

5. If frozen fishery products are imported directly from a refrigerated vessel, as set out in Article 15, paragraph 3 of Regulation 854/2004, the certificate established by Regulation 1250/2008 may be replaced by a document signed by the Commander of the ship compliant with the model established by regulation (EU) no. 809/2011 which amends Regulation (EC) N 2074/2005.

The import of processed bivalve molluscs, gastropods, tunicates and echinoderms is allowed only from third countries for which there are authorized areas coming from establishments included in the lists authorized for fish products.

GENERAL INDICATIONS DESCRIBED BY HYGIENE REGULATIONS RELATING TO FISHERY PRODUCTS.

From Regulation (EC) No. 853/2004 (as amended)

DEFINITIONS

Fishery products: all marine and freshwater animals except live bivalve molluscs, live echinoderms, live tunicates, live marine gastropods and all mammals, reptiles and frogs), wild or farmed and all forms, the edible parts and products of these animals.

Regulation 853 also applies to thawed unprocessed fishery products and fresh fishery products to which food additives have been added in accordance with relevant Union legislation

Fresh fishery products: unprocessed fishery products, whole or prepared, including products packaged under vacuum or in a modified atmosphere which, for the purpose of conservation, have not undergone any treatment other than refrigeration, intended to guarantee their conservation.

Prepared fishery products: unprocessed fishery products subjected to an operation that has modified their anatomical integrity, such as evisceration, beheading, slicing, filleting and mincing.

Processed fishery products: processed products resulting from the processing of fishery products or further processing of such processed products

IDENTIFICATION MARKING

The mark must be affixed either directly on the product or on the packaging or on the packaging or printed on a label affixed in turn; the mark can also consist of an irremovable tag of resistant material

The mark must be legible and indelible; the characters must be easily decipherable; it must be clearly displayed so that it can be checked. It must indicate the name of the country where the establishment is located or in full or through the two letters of the ISO code; must indicate the approval number of the establishment.

SPECIFIC REQUIREMENTS

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Primary production: breeding, fishing, harvesting of live fishery products with a view to being placed on the market, related operations if carried out on board fishing vessels (slaughter, bleeding, beheading, evisceration, fin fining, refrigeration and packaging) and transport storage of live products or products whose nature has not been altered until the first establishment

Pests: They must be frozen at -20°C in each part for at least 24 hours, either on the raw product or on the finished product:

- fishery products that are eaten raw or practically raw (sushimi)
- if intended for cold smoking $<60^{\circ}\text{C}$ inside: herring, mackerel, sprats, wild Atlantic and Pacific salmon
- marinated and / or salted fishery products if the treatment does not guarantee the destruction of the nematodes

Such fishery products must be accompanied to their placing on the market by a certificate from the producer indicating the treatment carried out (except if they are intended for the final consumer).

Visual inspection for visible endoparasites: not allowed for human consumption fishery products manifested as parasites.

PROHIBITIONS

Tetraodontidae puffer fish (*Arothron hispidus* ...)

Molidae: sunfish (English sun) (*Mola mola* *Masturus lanceolatus*)

Diodontidae porcupine fish (*Chilomycterus spinosus spinosus* *Diodon hystrix*)

Canthigasteridae (*Canthigaster*spp)

SPECIES WITH CAREFUL MEASURES

Gempylidae in particular: *Ruvettus preziosus* and *Lepidocybium flavobrunneum*, only in the form of packaged or packaged products appropriately labeled in order to inform the consumer about preparation or cooking methods and the risk connected to the presence of substances with adverse gastrointestinal effects. The scientific name on the label is mandatory.

Fish products containing biotoxins (ciguatoxin) must not be placed on the market; limits for bivalve products.

TRANSPORT TEMPERATURE

Fresh, chilled and thawed products: temperature close to that of melting ice

Frozen products: (except whole fish initially frozen in brine for canning manufacture): -18°C ; fluctuations of $+3^{\circ}\text{C}$ allowed.

If the products are under ice, the melt water must not remain in contact with the products.

Live products must be transported in conditions that do not affect food safety and vitality.

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Reg. (CE) 854/2004 (as amended)

OFFICIAL CHECKS

- Organoleptic tests: freshness

- If doubts arise about freshness, samples for ABVT and TMA-N (limit set for *Sebastes*, *Helicolenus*, *Sebastichthys capensis*, *pleuronettids*, excluding *Halibut*, *Salmo Salar*) (Reg. (CE) 2074/2005)

- Histamine random checks

- Residues and contaminants

- Microbiological

- Parasites:

visible parasite: distinguishable in fish tissues by size, color or structure;

- visual inspection: non-destructive examination of fish without the use of optical instruments in good lighting conditions or by candling (for flatfish or fillets = backlight observation in a dark room) (Reg. (CE) 2074/2005)

Checks on products imported from third countries

Each third country interested in exporting to the Community and therefore San Marino territory must:

- based on the existing general guarantees in the areas of public health and animal health, to be recognized and included in a community list
- offer specific guarantees in relation to each product to be exported, proven by a model of health certificate established in the EU that must be signed by the competent authorities of the third country and accompany the product to the recipient
- have production facilities recognized and included in a community list.

The arrival of each batch of product, destined for the EU market, must be announced to the BIP entering the EU territory for the purpose of carrying out veterinary checks.

Inspection controls are, as a rule, carried out according to percentages established with decisions of the European Commission which vary according to the type of product, even assuming the character of "systematicity".

In the event of unfavorable controls, the BIPs, depending on the non-conformity and / or the ascertained risk:

- adopt specific health measures on the consignment concerned, including: cancellation of the certificates / documents accompanying the consignment in order to prevent their reintroduction into the Community territory; rejection or destruction of the consignment or, in the absence of health risks, its destination for uses other than human consumption
- have strengthened controls on the next 10 imported lots of the same type, origin and origin with their seizure and laboratory analysis. A further intervention aimed at managing health risk,

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concerning both products imported from third countries and those of EU origin, is the activation of the so-called Alert System which allows all the Authorities of the States participating in the System to be informed.

In the case of products imported from third countries, the communication issued to all the BIP's of the EU makes it possible to activate the strengthened control procedures as well as the possible adoption of precautionary measures on the lots of type and origin similar to that ascertained at risk.

ATTACHED

A summary of the Laws and Decrees in force in the Republic of San Marino concerning fish products and other products such as seafood is attached to this document.

Please accept, Dr. Vlasov, the assurance of my highest consideration.

Dr. Antonio Putti

Responsible for Veterinary Health and Food Hygiene

Prevention Department of the Republic of San Marino

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