



Guidelines for Application of SSOQ Certification Standards to Processors

Final Draft for Comment

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These Certification Standards have been prepared by the Shrimp Seal of Quality Organization.

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Table of Contents

INTRODUCTION	1
GUIDELINES FOR APPLICATION OF CERTIFICATION STANDARDS TO PROCESSORS.....	2
1. Food Safety and Quality Assurance	2
2. Traceability.....	3
3. Environmental Sustainability	4
4. Labour Practices	5
5. Social Responsibility	6
ANNEX 1: SSOQ ALLOWABLE LEVELS OF CHEMICALS AND COMPOUNDS	7
ANNEX II: SSOQ EFFLUENT DISCHARGE STANDARDS	8

Introduction

The Shrimp Seal of Quality (SSOQ) has prepared SSOQ Certification Standards [Standards] pertaining to food safety, quality assurance, traceability, environmental sustainability, labour practices, and social responsibility in the Bangladesh shrimp industry. These Standards apply to all operators in the shrimp sector, including shrimp hatcheries, feed mills, ice plants, farms, depots and transporters, and processing plants who are certified by SSOQ. Certification to these Standards is voluntary.

SSOQ has prepared Guidelines for Application of Certification Standards that clarify the application and interpretation of these Standards for different types of shrimp operations, including farms, depots and transporters, and processors. Additional Guidelines will be prepared for hatcheries, feed mills, and ice plants in the future.

These Guidelines for application of the SSOQ Standards to shrimp processors are provided in this document. The Guidelines provide an interpretation of the Standards with respect to shrimp processors, and further define the responsibilities of processors in meeting these Standards.

This document is arranged to provide Guidelines concerning each section of the Standards. In each of these sections, the Standards themselves are reproduced verbatim in the left-hand column, with the Guidelines for their application in the right-hand column.

Guidelines for Application of Certification Standards to Processors

1. Food Safety and Quality Assurance

Standards	Guidelines for Application of Standards to Processors
<i>1.1. Internationally banned antibiotics, drugs, food additives and other chemical compounds, as listed in SSOQ's Allowable Levels of Chemicals and Compounds, shall not be used.¹</i>	Not applicable to processors.
<i>1.2. Therapeutics shall be used in the manufacturer's prescribed manner for the control of diagnosed conditions and diseases, not for prophylactic purposes. Levels of these compounds and other contaminants shall be within the restricted limits of SSOQ's Allowable Levels of Chemicals and Compounds.</i>	Processors shall regularly test processed product to ensure that levels of harmful compounds as listed in the SSOQ Allowable Levels of Chemicals and Compounds are below the allowable limits.
<i>1.3. Human and untreated animal wastes shall be kept away from shrimp operations and appropriate sanitary facilities shall be accessible.</i>	Processors shall ensure that sanitation is maintained per the standards imposed by proper implementation of HACCP, GMP, and SSOP.
<i>1.4. Shrimp shall be harvested, handled and transported in a manner that prevents contamination and deterioration.</i>	Processors should take steps, through receiving inspection and other available means, to ensure that shrimp delivered to the processing plants is unadulterated and has been safely cultivated, harvested, stored and transported prior to reaching their custody.
<i>1.5. Shrimp processing plants shall prepare, implement, and keep records of HACCP plans per HACCP, GMP, and SSOP requirements.²</i>	Processors in Bangladesh are required to comply with HACCP per the Fish and Fish Products Inspection and Quality Control Rules of 1997 governing plant sanitation, HACCP implementation, and other requirements. Evidence that HACCP plans are in existence and implemented should be made available to the certifier. Records of HACCP plan implementation, including records of regular product testing for microbial, chemical, and pollutants shall be made available to the certifier.
<i>1.6. Shrimp shall not be modified or adulterated through the addition of undeclared materials.</i>	Shrimp shall be processed without adulteration of any kind or the addition of any undeclared foreign material, whether solid or liquid, with the purpose of increasing its weight or disguising its true quality.
<i>1.7. Weights and counts of packaged shrimp shall be as declared.</i>	Processors shall take the necessary measures to ensure that their packaged shrimp reflects weights and counts accurately, and that personnel are trained and equipment maintained properly for this purpose.

¹ See Annex 1 for SSOQ Allowable Levels of Chemicals and Compounds.

² Hazard Analysis Critical Control Point (HACCP) is defined by the UN/FAO Codex Alimentarius Recommended International Code of Practice, General Principles of Food Hygiene, CAC/RCP-1, Rev. 3-1997 and by the US FDA in 9 CFR 417. GMP (Good Manufacturing Practices) and SSOP (Sanitation Standard Operating Procedures) are defined by US FDA in 9 CFR 416 and 21 CFR 110 respectively.

1.8. <i>All labels and packaging shall comply with the laws and regulations of the importing country.</i>	Processors shall ensure that they know and comply with the laws and regulations of the importing countries to which shrimp is being exported in relation to packaging and labelling.
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General Guidelines: SSOQ certifiers will conduct site visits and inspections of processing facilities, including the collection and testing of samples, to determine that these Standards are being met.

2. Traceability

Standards	Guidelines for Application of Standards to Depots or Transporters
2.1. <i>Shrimp operators shall keep records that identify and trace inputs used in their operations.</i>	<p>Processors shall maintain records that allow one to trace each processed lot of shrimp back to the farm(s) or farm group(s) from which it originated.</p> <p>The following records should be kept by SSOQ certified processors:</p> <ul style="list-style-type: none"> • Lot number or other unique identification. • Quantity • Source of shrimp: depot/ transporter • Producer of shrimp: farm or farm group name or unique identification • Date received • Purchaser (processor or consolidator or other buyer)
2.2. <i>The origin of shrimp bearing the SSOQ seal shall be traceable to SSOQ certified operators throughout the custody chain to the producing farm.</i>	Identification provided by farmers and depots shall be maintained until shrimp has been assigned to lots, at which point appropriate records to maintain traceability to the source of the shrimp shall be maintained. Only shrimp for which traceability back to SSOQ certified farms or farm groups has been maintained may carry the SSOQ seal.
2.3. <i>Shrimp produced at SSOQ certified farms shall be handled, transported and processed separately from that produced at uncertified farms.</i>	Shrimp from different farms or farm groups should preferably be kept separate, but in the case of small quantities, the number of farms or farm groups mixed in a single lot should be minimized. At no time shall shrimp from an SSOQ certified farm or farm group be mixed with shrimp from uncertified farms.

General Guidelines: A farm may represent an individual farm or a farm group. SSOQ may chose to certify farmers in groups provided they meet specified criteria for proximity, number of farmers in the group, total and individual acreage, and a cooperation agreement. The violation of a single member of the group of these Standards represents a violation of the entire farm group.

3. Environmental Sustainability

Standards	Guidelines for Application of Standards to Processors
3.1. <i>Wild caught shrimp larvae shall not be used.</i>	Not applicable to processors.
3.2. <i>There shall be no import or cultivation of non-indigenous shrimp species.</i>	
3.3. <i>Shrimp operations shall not divert or obstruct public water flows.</i>	Not applicable to processors.
3.4. <i>Mangrove forests shall not be used for new shrimp farm development.</i>	Not applicable to processors.
3.5. <i>Earthen structures, such as dikes and canals, shall be constructed in a manner that minimizes erosion and seepage.</i>	Not applicable to processors.
3.6. <i>Water movement to and from shrimp ponds shall be minimized and water flows managed in a manner that prevents erosion or other adverse impacts to surrounding land and water.</i>	Not applicable to processors.
3.7. <i>All water shall meet SSOQ Effluent Discharge Standards³ before discharge.</i>	Processors should undertake their operations with awareness of the impact of their operations on the surrounding environment and communities and take measures to avoid any negative impacts due to the location of their facilities, disposal of wastes, or the presence of their vehicles. All wastes or materials used at the depot or by the transporter shall be disposed of responsibly to minimize risks to communities and environment.
3.8. <i>Effluents and solid wastes shall be disposed of in an environmentally sustainable manner.</i>	
3.9. <i>Chemicals, fuels, and feed shall be stored, used, and disposed of in a manner to prevent contamination of the environment.</i>	

General Guidelines: SSOQ certifiers will conduct site visits and inspections of depots and transport facilities, including the collection and testing of samples, to determine that these Standards are being met.

³ See Annex 2 for SSOQ's Effluent Discharge Standards.

4. Labour Practices

Standards	Guidelines for Application of Standards to Processors
<p>4.1. <i>Employers shall not use bonded or forced labour.</i></p> <p>4.2. <i>Employers shall compensate workers in compliance with laws in force in Bangladesh.</i></p> <p>4.3. <i>Employers shall ensure that working conditions comply with laws in force in Bangladesh. Employers shall evaluate health and safety hazards and take reasonable steps to eliminate or control risks to workers posed by these hazards, and educate the workers on these risks.</i></p> <p>4.4. <i>Employers shall not require workers to work for more than the regular hours prescribed by laws in force in Bangladesh. Workers shall be entitled to at least one day off in every seven-day period without jeopardizing their employment. All overtime hours must be worked voluntarily.</i></p> <p>4.5. <i>Employers shall not discriminate in employment based on gender, age, or religion.</i></p> <p>4.6. <i>Employers shall ensure that no worker is subjected to any physical, sexual, psychological, or verbal harassment, abuse, withholding of earned wages, or other form of intimidation.</i></p> <p>4.7. <i>Where children are employed, employers shall comply with the relevant provisions of laws in force in Bangladesh.⁴ Where feasible, employers shall make accommodations to provide working children access to educational opportunities. Employers shall not employ children under the age of fourteen.</i></p> <p>4.8. <i>Employers shall comply with the relevant provisions of laws in force in Bangladesh relating to the welfare of female workers who are pregnant, breast-feeding, or on maternity leave.</i></p> <p>4.9. <i>Labour shall be allowed to associate, organize, bargain collectively, and execute their rights as prescribed by laws in force in Bangladesh.</i></p>	<p>Processors shall be in compliance with all relevant labour laws in force in Bangladesh. SSOQ certifiers will evaluate the processor's compliance with the SSOQ Certification Standards in particular, and Bangladesh labour laws in general, through site visits and interviews with management and employees.</p> <p>Processors should strive to exceed the minimum requirements of the Bangladesh labour laws currently in force in terms of working conditions, safety, and services provided to employees. Lessees of land and local labour shall be given preference in employment. Where meals or living quarters are provided to employees, the employee's wellbeing should be made a priority.</p>

General Guidelines: SSOQ certifiers will conduct site visits and inspections of depots and transport facilities, including interviews with employers and employees, to determine that these Standards are being met.

⁴ A child is defined as a person under the age of seventeen per Article 66 of the Factories Act, 1965.

5. Social Responsibility

Standards	Guidelines for Application of Standards to Processors
<p>5.1. <i>Landowners shall have clear legal right of ownership to the land on which shrimp operations take place.</i></p> <p>5.2. <i>The terms or agreement pertaining to the use of land belonging to another shall be in writing and fully complied with by lessors and lessees.</i></p>	<p>Processors shall produce clear legal title or valid lease to the land where their processing facilities are located.</p>
<p>5.3. <i>Land used for shrimp operations shall not be acquired by coercion.</i></p> <p>5.4. <i>Shrimp operations shall not block or interfere with local communities' rights to access common property resources that they depend on for survival and livelihood, including but not limited to fishing grounds, rivers, canals and rights of way.</i></p> <p>5.5. <i>Shrimp operations shall not hinder or disrupt the daily activities of neighbouring farms and communities.</i></p> <p>5.6. <i>Shrimp operations owners and workers shall respect and not interfere with the religious, cultural, and traditional beliefs and practices of the local community.</i></p> <p>5.7. <i>Shrimp operators shall make workers aware of their obligations to the local community as stated in this Standard and shall be held responsible for the acts and social conduct of their workers.</i></p>	<p>The social conduct of SSOQ certified processors shall be monitored to ensure that the processor does not commit, participate in, encourage, or cover up any social misconduct or crimes against persons or the community. In the case of any incident where processors or their workers are implicated in social misconduct or crimes against persons in the community, SSOQ will review the incident and subsequent actions taken by the processor to address the situation to determine whether certification should be withdrawn.</p>

General Guidelines: SSOQ certifiers will rely on information provided by grassroots organizations and conduct site visits and inspections of depots and transporter facilities, including interviews with owners, employees, and community members, to determine that these Standards are being met.

These Guidelines shall be reviewed by SSOQ on at least an annual basis.

Annex 1: SSOQ Allowable Levels of Chemicals and Compounds

This list of chemicals, compounds, and heavy metals as well as the associated maximum allowable levels are based on the minimum requirements of major importing countries, including the United States and European Union. The chemicals and compounds included, as well as the allowable levels, shall be reviewed at least on an annual basis and are subject to change following changes in international market requirements.

Name	Description	Allowable Level	Notes
Chloramphenicol*	Antibiotic	0.3 ppb (US FDA)	BANNED FROM USE
Nitrofurén*	Antibiotic	1.0 ppb	BANNED FROM USE
Aldrin/ Dieldrin	Pesticide	0.3 ppm	
Chlordane	Pesticide	0.3 ppm	
Chlordecone (Kepone)	Pesticide	0.3 ppm	
DDT, TDE, DDE	Pesticide	5.0 ppm	
Diquat	Pesticide	3.0 ppm	
Heptachlor/ Heptachlor epoxide	Pesticide	0.3 ppm	
Mirex	Pesticide	0.1 ppm	
Polychlorinated biphenyls (PCBs)	PCB	2.0 ppm	
2,4-D	PCB	1.0 ppm	
Arsenic	Heavy metal	76 ppm	
Cadmium	Heavy metal	3 ppm	
Chromium	Heavy metal	12 ppm	
Lead	Heavy metal	1.5 ppm	
Nickel	Heavy metal	70 ppm	
Methyl mercury	Heavy metal	1 ppm	

* An allowable level above zero is not a license to use the compound. Chloramphenicol and nitrofurén are banned from use by all SSOQ certified operators, however levels up to the allowable limits are acceptable since these trace levels could have come from uncontrollable sources.

Annex II: SSOQ Effluent Discharge Standards

Variables	Values	Frequency	Notes
pH (standard units)	6.0 – 9.5	Monthly	
Total suspended solids (mg/L)	100 or less	Quarterly	Final sample prior to discharge at time of harvest
Soluble phosphorus (mg/L)	0.5 or less	Monthly	
Total ammonia nitrogen (mg/L)	5 or less	Monthly	
5-day biochemical oxygen demand (mg/L)	50 or less	Quarterly	Final sample prior to discharge at time of harvest
Dissolved oxygen (mg/L)	4 or more	Monthly	
Chloride	800 mg/L or less	One sample per season at discharge at time of harvest	Applicable only for farms when discharged into freshwater

Farms with stocking densities above 9 PL per square meter and all processing plants are required to perform periodic testing per the schedule above. Effluents from farms with stocking densities below 9 PL per square meter will be surveyed by SSOQ on an ongoing basis to monitor effluent quality.

These standards will be reviewed on at least an annual basis.