



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis
Director

Grange
SANTE.F1 PN/mr

Subject: Reply to Viet Nam's National Authority for Agro-Forestry- Fisheries Quality Processing and Market Development (NAFIQPM) letter 195/CCPT-ATTP dated 29 January 2024

Dear Dr Nguyen Nhu Tiep,

Thank you very much for your letter dated 29 January 2024 (your ref.: 195/CCPT-ATTP) in which you raise questions concerning the certification of imported raw materials into Viet Nam for further processing into fishery products to be exported to the EU.

Your first query concerns the use of official certificates attesting the compliance of imported fishery products into Viet Nam with the relevant EU requirements. You propose the possibility that those products are accompanied by a certificate with limited attestations not covering all the relevant EU requirements. I regret to inform you that this proposal does not provide sufficient guarantees of compliance with the relevant requirements. I would like to highlight that an EU listed establishment in a third country might legitimately produce, for non-EU export, fishery products that do not comply with the EU requirements. Therefore, limiting the attestations in the certificate as you suggest, a) does not ensure that the imported raw materials covered by such a simplified health certificate comply with all the EU requirements and, b) it does not enable the certifying officer to avail of the necessary information in order to reliably endorse all the attestations contained in the model certificate FISH-CRUST-HC of chapter 28 of Annex III to Regulation (EU) 2020/2235.

Your **second query** concerns the use of certificates for fishery products landed in Viet Nam, signed by the captain, in accordance with the model FISH/MOL-CAP of Chapter 30 of Annex III to Regulation (EU) 2020/2235. I confirm that such certificate signed by the captain is sufficient in order to attest EU eligibility of those raw materials directly landed in Viet Nam. If required, your services may take due diligence steps to confirm that the certificate provided by the captain is in conformity with the rules on official

Nguyen Nhu Tiep

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certification as required by the Union legislation. We cannot comment further on the document that you provided.

I trust that the above clarify your queries and I am looking forward receiving the updated action plan addressing the recommendations of audit report DG(SANTE)2023/7759.

Yours sincerely,

(e-signed)

María Pilar Aguar Fernández

c.c.: H.E. Mr Nguyen Van Thao, Ambassador, Mission of Viet Nam to the EU
H.E. Mr Julien Guerrier, Ambassador, Delegation of the EU to Viet Nam