

Bureau of Customs now permits correction of errors in imports entries without filing a formal protest, which broadens the scope of errors subject to correction.

LICENSING: It is advisable to consult a lawyer before entering into any licence agreement; deals may for instance run into problems with either EC or West German anti-cartel law.

There are two principal types of licence in Germany: the simple and the exclusive. With an exclusive licence, the licensee can only grant one licence in any area; with a simple licence, any number can be granted.

INSPECTIONS: Enforcement of the German food law, and consequently both the taking of samples of foodstuffs and the performance of chemical analyses on them, is entirely in the hands of the 11 German states. Each individual state has developed its own administrative orders.

Special regulations govern aflatoxins in foodstuffs. Regarding the maximum level of mercury in fish, crustacea and molluscs, the FRG prohibits the circulation of fish foods for consumption with a mercury content of more than 1 ppm.

Regulations over levels of Nematodes

Draft regulations to set the maximum permitted levels of nematodes in fish sold to consumers have been prepared at both the national and Community level. Contrary to earlier expectations, EC legislation has still not been implemented and it remains open as to what will eventually be passed.

The German draft legislation, although not yet in force, poses some potential problems in the view of the German fish association. Both the Danes and the Norwegians have made interventions in Bonn that they could not guarantee the low level of nematodes required in these regulations (not more than one nematode per kilo as measured by the light table method). It is believed that they have proposed a maximum level of three nematodes per kilo.

Although the German trade can live with the proposed levels, they are worried about how the various veterinary services will actually carry out the testing. The trade feels that there is a wide latitude and that a situation could result where a shipment is certified at one level only to have tests by another method make it unacceptable. Probably only a legal decision will clarify this once regulations are in place.

Voluntary Nematode testing for imports from Canada

The present system of certification by Fisheries and Oceans works very well and is perfectly satisfactory to the German trade. With an eye to future demands, however, importers are now asking their suppliers to inspect the fish for worms and supply the documentation to the importer. This is not given to their customers but remains on file in case of any dispute.