| REPORT On implementation results of The Residues Monitoring Program for Certain Harmful Substances in aquaculture fish and products thereof in 2011 and Program Plan in 2012 Hanoi, March 2012 | |
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| REPORT On implementation results of The Residues Monitoring Program for Certain Harmful Substances in aquaculture fish and products thereof in 2011 and Program Plan in 2012 | MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT |
| On implementation results of The Residues Monitoring Program for Certain Harmful Substances in aquaculture fish and products thereof in 2011 and Program Plan in 2012 | NATIONAL AGRO-FORESTRY-FISHERIES QUALITY ASSURANCE DEPARTMEN |
| On implementation results of The Residues Monitoring Program for Certain Harmful Substances in aquaculture fish and products thereof in 2011 and Program Plan in 2012 | |
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PART I

RESULTS OF THE MONITORING PROGRAM FOR CERTAIN HARMFUL SUBSTANCES RESIDUES IN 2011

1. General

The Residues Monitoring Program for Certain Harmful Substances in aquaculture fish and products thereof (hereafter called as "Monitoring Program") has been implemented with allocated budget and plan approved by the Ministry of Agriculture and Rural Development. Relevant bodies carried out the Program in accordance with the regulations promulgated by the Decision No. 130/2008/QD-BNN of 31 December 2008 of the Ministry of Agriculture and Rural Development, procedures as described in the Practice Manual for residues control as well as relevant guidance published by the National Agro-Forestry-Fisheries Quality Assurance Department (NAFIQAD), which are also in compliance with EC regulations.

2. Scope and species monitored in 2011

2.1. Scope and species monitored by NAFIQAD reginal authorities

| Table 1: Scope of 2011 | Monitoring Program |
|------------------------|--------------------|
|------------------------|--------------------|

| Region | Participating provinces | No. of aqua. areas | Aquaculture species | | |
|--------|---|--------------------|---|--|--|
| North | Quang Ninh, Hai Phong, Thai Binh, Nam Dinh, Ninh Binh, Thanh Hoa, Nghe An, Ha Tinh | 35 | Black Tiger Shrimp (Penaeus monodon), White shrimp (Penaeus vannamei), tilapia (Oreochromis spp), Crab (Scylla serrata), Four-eyes sleeper (Bostrichthys sinenesis Lacepede) | | |
| Centre | Quang Binh, Quang Tri, Thua Thien Hue, Da Nang, Quang Nam, Quang Ngai, Binh Dinh, Phu Yen, Khanh Hoa, Ninh Thuan | 50 | Black Tiger Shrimp (Penaeus monodon), White shrimp (Penaeus vannamei), catfish (Pangasius hypophthalmus), tilapia (Oreochromis spp), Grass carp (Ctenopharyngodon idellus) | | |
| South | Ben Tre, Tien Giang, Long An, Hochiminh City, Dong Nai, Ba Ria - Vung Tau, Binh Thuan, Ca Mau, Bac Lieu, Soc Trang, An Giang, Can Tho, Dong Thap, Hau Giang, Kien Giang, Tra Vinh, Vinh Long | 78 | Black Tiger Shrimp (Penaeus monodon), Giant prawn (Macrobrachium rosenbergii), White shrimp (Penaeus vannamei), Crab (Scylla serrata), catfish (Pangasius hypophthalmus), Tilapia (Oreochromis spp), Climbing perch (Anabas testudineus), Snakehead (Ophiocephalus striatus), Feather back Fish (Notopterus notopterus) | | |
| Total | 35 provinces/cities | 163 | | | |

2.2. Sampled species

Under the Monitoring Program 2011, samples have been taken at all stages of production chain, from hatchery to commercial size farming stage. Details of sampling at each stage and groups to be analysed are described in the Table 2.

Table 2: Species samples in 2011

| No. | Production stage | Samples taken | Testing parameters |
|-----|------------------|---------------------------|---|
| 1 | Hatchery | Hatchery water | CAP |
| 2 | Aquaculture site | Fish farmed at all stages | A1, A3, A6, B1, B2a, B3a, B3c, B3d, B3e |
| 3 | Middlemen | Fishery raw materials | CAP |

Note:

- Al group (Stilbens salts and derivatives of stilbens): Diethylstilbestrol
- A3 group (Steroids): Methyltestosterone
- A6 group (prohibited antibiotics): Chloramphenicol (CAP), Nitrofurans (NTRs)
- Bl group (Anti-bacteria substances): Groups of Tetracycline, Quinolones, Sulfonamide, Trimethoprim, Florfenicol.
- B2a group (Anti worm substances, paracides): Trichlofon, Praziquantel; Trifluralin is tested together with B2a group.
- B3a group (Organochlorine compounds): HCB, Lindane, Heptachlor, Aldrin, Dieldrin, Eldrin, Chlordan, DDT
- B3c group (heavy metals): Pb, Cd, Hg
- B3d group (Mycotoxins): Aflatoxin
- B3e group (Dyes): Malachite Green/Leucomalachite Green; Crystal Violet/Leucocrystal Violet.

3. Sampling and testing

3.1. Sampling

In 2011, the sampling was carried out by the local competent authorities in compliance with the plan approved by the Ministry of Agriculture and Rural Development. However, following monthly reports by local competent authorities, NAFIQAD Headquarter, NAFIQAD CRA (Central Region Authority) and NAFIQAD SRA (Southern Regional Authority) amended monthly sampling plan to be appropriate to current local context.

Sampling activities carried out in 2011 by regions covered by NAFIQAD Headquarter, NAFIQAD CRA and NAFIQAD SRA are showed in Table 3.

Table 3: Sampling activities in 2011

| Regions | No | rth | Ce | ntre | So | uth | | Tota | al |
|---|------|-------------|------|-------------|-------|-------------|-------|-------------|--------------|
| Samples by species | Plan | De facto | Plan | De facto | Plan | De facto | Plan | De facto | Difference |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10)=(8)-(9) |
| Catfish (<i>Pangasius</i> hypophthalmus) | 0 | 0 | 9 | 9 | 1,264 | 1,256 | 1,273 | 1,265 | 8 |
| Tilapia (<i>Oreochromis</i> spp), | 73 | 54 | 18 | 18 | 26 | 26 | 117 | 98 | 19 |
| Climbing perch (Anabas testudineus) | 0 | 0 | 0 | 0 | 42 | 45 | 42 | 45 | -3 |
| Snakehead (<i>Ophiocephalus</i> striatus) | 0 | 0 | 0 | 0 | 36 | 34 | 36 | 34 | 2 |
| Four-Eyes Sleeper (Bostrichthys sincnesis Lacepede) | 7 | 7 | 0 | 0 | 0 | 0 | 7 | 7 | 0 |
| Grass Carp (Ctenopharyngodon idellus) | 0 | 0 | 6 | 6 | 0 | 0 | 6 | 6 | 0 |
| Featherback fish (Notopterus notopterus) | 0 | 0 | 0 | 0 | 20 | 20 | 20 | 20 | 0 |
| Black Tiger shrimps (Penaeus monodon) | 94 | 84 | 81 | 81 | 822 | 780 | 997 | 945 | 52 |
| White shrimps (<i>Penaeus vannamei</i>) | 140 | 123 | 400 | 400 | 210 | 208 | 750 | 731 | 19 |
| Giants Prawn (<i>Macrobrachium</i> rosenbergii) | 0 | 0 | 0 | 0 | 26 | 24 | 26 | 24 | 2 |
| Crab (Scylla serrata) | 15 | 13 | 0 | 0 | 0 | 0 | 15 | 13 | 2 |
| Raw materials at middlemen | 19 | 13 | 52 | 52 | 80 | 76 | 151 | 141 | 10 |
| Fish breeds/hatchery water at shrimps farm | 18 | 15 | 47 | 47 | 143 | 140 | 208 | 202 | 6 |
| TOTAL | 366 | 309 | 613 | 613 | 2,669 | 2,609 | 3,648 | 3,531 | 117 |

Under the Monitoring Program 2011, total of 3,531 samples were taken, in which 3,188 samples of aquaculture fish, 202 of juvenile fish and hatchery water and 141 of fish raw materials taken at middlemen, completing 96,8% of the Plan.

Number of samples taken was less than the one planned for some reasons such as: reduction of aquaculture surfaces and production, diseases occurred in some areas causing death and impossible sampling and natural disaster (flood, tornado...) in Central region.

3.2 Testing results

In 2011, number of violated samples was 32 over 3,531 analyzed samples (\approx 0,9%), less that the one in 2010, which was 57 over 4,075 (\approx 1,3%); Comparison in violated samples of 2010 and 2011 are as follows:

| Year | Violated samples/total analyzed samples (%) | | |
|--|---|------|--|
| Groups | 2010 | 2011 | |
| Group A1(Stilbens- salts and derivatives of stilbens) | 0 | 0 | |
| Group A3 (Steroids) | 0 | 0 | |
| A6 group (prohibited antibiotics) | 0,93 | 0,87 | |
| B1 group (Anti-bacteria substances) | 0,43 | 0,47 | |
| B2a group (Anti worm substances, paracides) and Trifluralin | 3,25 | 0,88 | |
| B3a group (Organochlorine compounds) | 0 | 0 | |
| Group B3c (Heavy metals) | 0,52 | 0,46 | |
| Group B3d (Mycotoxins) | 0 | 0 | |
| Group B3e (Dyes) | 0,34 | 0 | |

Testing results for harmful substances residues in 2011 are showed in Table 4.

Table 4. Testing results in 2011

| Monitored groups | Monitored | Testing | Ana | lysis | MRLs | Number of unsatisfactory | |
|---------------------|--------------------|----------|------|-------------|-------|--------------------------|--|
| Withintored groups | substances | methods | Plan | De facto | (ppb) | samples | |
| 1. Aquaculture fish | | | | | | | |
| A1. STILBENES | Diethylstilbestrol | LC/MS/MS | 70 | 72 | | 00 | |
| A3. Steroids | Methyltestosterone | LC/MS/MS | 72 | 74 | ND | 00 | |
| A6. Chloramphenicol | Chloramphenicol | LC/MS/MS | 517 | 511 | | 01 | |
| A6.NITROFURANS | | LC/MS/MS | 547 | 526 | | | |
| Nitrofurantoin | AOZ | LC/MS/MS | 547 | 526 | | 01 | |
| Furaltadone | AMOZ | LC/MS/MS | 547 | 526 | ND | 00 | |
| Furazolidone | AHD | LC/MS/MS | 547 | 526 | | 04 | |
| Nitrofurazone | SEM | LC/MS/MS | 547 | 526 | | 03 | |

| Monitored groups | Monitored | Testing | Ana | ılysis | MRLs | Number of unsatisfactory samples | |
|-----------------------------------|---|---------------------|------|-------------|---|----------------------------------|--|
| 3 1 | substances | methods | Plan | De facto | (ppb) | | |
| B1. Antibiotics Screening methods | TETRACYCLINES SULFONAMIDES QUINOLONES | ELISA | 0 | 0 | 0 | 0 | |
| | TETRACYCLINES | LC/MS/MS | 153 | 149 | | | |
| | Chlotetracycline | | 56 | 56 | 100 | 00 | |
| | Oxytetracycline | LC/MS/MS | 153 | 149 | 100 | 01 | |
| | Tetracycline | | 153 | 149 | 100 | 00 | |
| | SULFONAMIDES | LC/MS/MS | 422 | 404 | 100 | | |
| | Sulfadimethoxine | | 422 | 404 | | 00 | |
| | Sulfachloropiridazine | | 422 | 404 | | 00 | |
| | Sulfamethoxazole | LC/MS/MS | 422 | 404 | 100 | 00 | |
| | Sulfamethazine (Sulfadimidine) | De/Months | 422 | 404 | 100 | 00 | |
| | Sulfadiazine | | 422 | 404 | | 00 | |
| B1. Antibiotics | QUINOLONES | LC/MS/MS | 458 | 443 | | | |
| Confirmation method | Ciprofloxacin/ | | 458 | 443 | 600 for fish, 200 for shrimps and crabs | 05 | |
| | Enrofloxacin | | 458 | 443 | | | |
| | Flumequine | LC/MS/MS | 458 | 443 | | 00 | |
| | Difloxacin | | 62 | 62 | 300 | 00 | |
| | Sarafloxacin | | 458 | 443 | 30 | 00 | |
| | Oxolinic acid | | 144 | 144 | 100 | 00 | |
| | Danofloxacine | | 62 | 62 | 100 | 00 | |
| | Florfenicol | LC/MS/MS | 100 | 100 | 1000 | 00 | |
| | Trimethoprim | LC/MS/MS | 184 | 172 | 50 | 00 | |
| B2a. Anti worm substances, | Trichlofon (Dipterex) | GC/MS & LC/MS/MS | 117 | 106 | NID | 00 | |
| parasiticides | Praziquantel | GC/MS | 481 | 456 | ND | 00 | |
| Trifluralin | Trifluralin | GC/MS | 481 | 456 | | 09 | |
| | Aldrine | GC - ECD | 219 | 211 | 200 | 00 | |
| | Dieldrine | | 219 | 211 | 200 | 00 | |
| | Endrine | | 219 | 211 | 50 | 00 | |
| B3a. Organochlorine | | | 219 | 211 | 200 | 00 | |
| compounds | DDT | GC - ECD | 219 | 211 | 1000 | 00 | |
| | Chlordane | | 219 | 211 | 50 | 00 | |
| | Hexachorobenzen | | 219 | 211 | 200 | 00 | |
| | Lindane | | 219 | 211 | 1000 | 00 | |
| | Hg | | 220 | 217 | 500 | 00 | |
| B3c. Heavy metals | Cd | AAS | 220 | 219 | 50 for fish, 500 for shrimps | 01 | |
| <u></u> | Pb | 1 | 220 | 217 | 300 for | | |

| Manitored groung | Monitored substances | Testing | Ana | lysis | MRLs | Number of unsatisfactory |
|-------------------------------|--|----------|------|-------------|-----------------------------|--------------------------|
| Monitored groups | | methods | Plan | De facto | (ppb) | samples |
| | | | | | fish, 500 for shrimps | |
| B3d. Mycotoxins | Aflatoxine | HPLC | 140 | 131 | 4 | 00 |
| | Malachite Green/ Leucomalachite Green | LC/MS/MS | 271 | 255 | NID | 00 |
| B3e. Dyes | Crystal Violet/ Leucocrytal Violet | LC/MS/MS | 109 | 104 | ND | 00 |
| 2. Raw materials at middlemen | | | | | | |
| A6. Chloramphenicol | Chloramphenicol | LC/MS/MS | 151 | 141 | ND | |
| 3. Hatchery water | | | | | | |
| A6. Chloramphenicol | Chloramphenicol | LC/MS/MS | 207 | 202 | ND | 08 |

3.2.1. For fish samples collected at farms

- Diethylstilbestrol (group A1) residues were not detected in 72 analysis; Methyltestosterone (group A3) were not detected in 74 analysis of farmed fish. As previous years, these results showed no abuse of hormones or growth stimulators in aquaculture industry in Vietnam.
 - Prohibited antibiotics (Group A6):
- + Among 511 analysis, 01 sample of commercial-sized black tiger shrimps (0,2%) were detected with *Chloramphenicol* residue of 0,52 ppb;
- + Nitrofurans were detected in 04 samples of aquaculture fish / 526 analysis (0.,76%) (a reduction of 53% in comparison with 2010: 11 violated samples / 768 analysis), of which 01 commercial-sized catfish with AOZ and AHD residues level of 0,22 ppb and 6,52 ppb, 03 commercialized-sized black tiger shrimps with AHD and SEM residues level of 1,33ppb and 5,31 ppb.

This demonstrated that the abuse of prohibited antibiotics group A6 in aquaculture is in ongoing but the tendency is reduced in comparison with previous years. Therefore, this group has to be intensively controlled in 2012.

- Group B3e Dyes: Malachite Green was not detected in farmed fish. This nodetection and monitoring results of previous years showed that the farmer's awareness in the use of Malachite Green for fish disease prevention/treatment has been improved. Since 2009, Crystal Violet (Gentian violet) has been added to group B3e, but it was not detected in aquaculture fish among 104 analyses.
 - For restricted antibiotics (group B1):
- + Oxytetracycline residue level of 356 ppb was detected in 01 white shrimp sample /149 analysis for Tetracycline group (accounting for0,67 %). Residues of this group hd not been found between the years 2006-2010.

- + Sulfonamide residues exceeding permitted MRLs was not found (positive sign in comparison with the year 2010 of which 2 violated samples/577 analysis was detected, accounting for 0,35 %).
- + 29 farmed fish samples were found with *Enrofloxacine/Ciprofloxacin* residues levels of 1,07 ppb and 1.727,74 ppb, of which 05 samples (including 03 commercialized-size catfish, 01 black tiger shrimp and 01 tilapia) over 443 analyses for *Quinolones* (representing for 1,13%) were exceeding EU MRLs (total residues of *Enrofloxacine and Ciprofloxacin* do not exceed 100ppb), from 178,9 ppb to 1.727,74 ppb; an increase of 66% in comparison with 2010 (04 violated samples / 581 analysis, accounting for 0.68%).
 - + Trimethoprim residues exceeding MRLs were not detected in 172 analysis.
 - + Florfenicol residues exceeding MRLs were not found in 100 analysis.

All above mentioned results showed that there is still the abuse of antibiotics groups B1 (especially *Enrofloxacine/Ciprofloxacin – Quinolones* group) for fishery disease treatment. Therefore, in 2012, these criteria need to be strictly controlled, parallelly with the enforcement of the Circular No. 03/2012/TT-BNNPTNT dated January 16, 2012 on the adding of *Enrofloxacine* to the list of chemicals and antibiotics banned for use in fishery production and trading.

- There was no detection of anti worm substances and parasiticides (B2a group) *Trichlorfon (Dipterex)* in 286 analysis, of *Praziquantel* in 456 fish farmed analysis.
- + *Trifluralin* was detected in 9 samples (including 07 commercial-sized catfish, 01 black tier shrimp and 01 climbing perch) over 456 analysis (9,9%) with detection levels from 1,5ppb to 265,69ppb (accounting for 1,97%, a deduction of 80,1%in comparison with 2010: 22 samples/222 analysis 9,9%). Monitoring results showed that in spite of the Circular No. 20/2010/TT-BNNPTNT of 02 April 2010 adding *Trifluralin* to the list of chemicals and antibiotics prohibited in aquaculture, *Trifluralin* is still abused but with a reducing tendency in comparison with 2010. Therefore, in 2012, together with control measures taken by Directorate of Fisheries to fish farms, establishments producing and trading chemicals and antibiotics prohibited in aquaculture, intensified control measures to this substance should be continued under the Monitoring Program 2012.
 - For environment contaminants:
- + There was no detection of Organochlorine compounds residues (Group B3a) in 211 analysis.
- \pm For heavy metal residues (Group B3c): 01 white shrimp sample / 217 analysis (0,46%) was found with Cadimi residues of 580ppb, which was exceeding MRLs
 - No Aflatoxin (B1) was detected in 131 analysis.

3.2.2. For fish samples collected at middlemen

Chloramphenicol residues were not found fish samples collected at middlemen.

3.2.3. For juvenile fish and shrimp hatchery water samples

08 shrimp hatchery water samples / 202 analysis (3,96%) were found with *Chloramphenicol* residue levels of from 0,26 ppb to 3,76ppb, a decrease of 43,3% in comparison with 2010: 10 violated samples/143 analysis – 6,99%. These results reflect the ongoing abuse of *Chloramphenicol*, but with a decreasing tendency in comparison with the years 2009 and 2010.

3.3. Actions taken against violations

3.3.1. For farmed fish

- a. Violations related to Chloramphenicol, Nitrofurans contaminations
- Requesting farm owners to suspend the harvesting and apply relaying regime / surveillance;
- Requesting processors not to purchase raw materials from aquaculture sites contaminated with residues of banned chemicals and antibiotics;
- Carrying out the investigation of contamination cause and intensifying the sampling. When the results of intensified samples testing were satisfactory, the harvesting in relevant aquaculture sites was allowed;
- Intensifying the sampling in contaminated aquaculture farms/areas in the following crop;
- Strengthening communication on harmfulness of using banned chemicals and antibiotics to farmers.
- b. Violations related to Tretracycline, Quinolones residues exceeding the MRLs
- Requesting farms to suspend the harvesting, apply relaying regime / surveillance;
- Intensifying the sampling;
- Until the antibiotics detection levels were under the MRLs, the relaying regime was removed and the harvesting was allowed.
- Guiding farmers to comply with the withdrawal time of veterinary drugs prior to harvesting.
- c. Violations related to Cd residues
- Requesting farms to suspend the harvesting, apply relaying regime / surveillance;
- Carrying out investigation of contamination cause and intensifying the sampling.
- When the results of intensified samples testing were satisfactory, the relaying regime was removed and the harvesting was allowed.

3.3.2. For hatchery water

- Requesting to stop sale and apply relaying regime / surveillance from contaminated hatchery;
- Carrying out investigation of contamination cause and intensifying the sampling.
- Revoking relaying regime when the testing results of intensified samples were satisfactory, then sale was allowed;

- However, since juvenile shrimps in contaminated hatchery basins died of disease, the hatchery let water out and stopped farming. Therefore, intensified samples would be taken when the farming restarts.
- Strengthening communication on relevant documents and harmfulness of using banned chemicals and antibiotics to farmers, recommending hatchery and farming owners to check composition of drugs indicated on the label prior to purchase and use, do not use drugs containing banned substances or substances without clear origin,...

PART II

PLAN 2012 - RESIDUES MONITORING PROGRAM FOR CERTAIN HARMFUL SUBSTANCES IN AQUACULTURE FISH

Based on monitoring results of 2011 and survey results on current aquaculture status, the Monitoring plan 2012 has been set up as follows:

1. Species and subjects to be monitored:

- a. Principles to identify species and subjects to be monitored:
- Aquaculture species with large production;
- Samples of raw materials at middlemen for verification of the use of banned chemicals, antibiotics in fishery preservation;
- No sampling of veterinary drugs and aquatic feeds to test for banned chemicals and antibiotics residues. This activity will be carried out by relevant Departments in charge of veterinary drugs and feeds control.
- b. Some inland fisheries with small production (5-10 tons/year) as reported by local competent authorities such as: carps, grass carps, tilapia, pomfret... shall be monitored and sampled under Post-harvest Monitoring Program.
 - c. In 2012, following species and subjects will be sampled:

Species:

- Tra catfish (*Pangasius hypophthalmus*)
- Tilapia (*Oreochromis spp*)
- Climbing perch (Anabas testudineus)
- Feather back fish (*Notopterus notopterus*)
- Four-eyed sleeper (*Bostrichthys sinenesis Lacepede*)
- Snakehead (Ophiocephalus striatus)
- Grass carp (*Ctenopharyngodon idellus*)
- Black tiger shrimps (*Penaeus monodon*)
- White shrimp (*Penaeus vannamei*)
- Giant prawn (Macrobrachium rosenbergii)
- Crab (*Scylla serrata*)

Subjects:

- Hatcheries
- Middlemen

2. Criteria to be analyzed

Following EU guidelines on the setting up of the Residue monitoring program of chemicals and antibiotics residues in aquaculture fish for third countries, monitoring

results of previous years and feedbacks from importing markets, testing groups in 2012 are designated as follows:

Table 5: Testing groups in 2012

| No. | Substrates | Designated testing groups |
|-----|----------------------------|--|
| 1 | Extensive aquaculture fish | - B3a: Organochlorine compounds, including Lindan, HCB, Heptachlor, Aldrin, Dieldrin, Endrin, DDT, Chlordane - B3c: Pb, Hg, Cd |
| 2 | Intensive aquaculture fish | - A6: Chloramphenicol and Nitrofurans (AOZ (3-amino-2 oxazolidinone); AMOZ (3-amino - 5 morfolinomethyl-1,3 oxazolidin-one); AHD (1-aminohydantoin); SEM - Semicarbazide) B1: Tetracylines group (Oxytetracycline, Tetracycline), Sulfonamides (Sulfadiazine, Sulfadimidine (Sulfamethazine), Sulfadimidine (Sulfamethoxine, Sulfachlorpyridazine), Quinolones group (Sarafloxacine, Ciprofloxacine, Enrofloxacine, Flumequine), Trimethoprim, Florfenicol B2a and Trifluralin: Praziquantel; Trifluralin B3a: Organochlorine compounds, including Lindan HCB, Heptachlo, Aldrin, Dieldrin, Endrin, DDT, Chlordane - B3c: Pb, Hg, Cd - B3d: Aflatoxin (B1) - B3e: Malachite Green/Leuco Malachite Green For farmed fish, following additional tests are required: - A1: Diethylstillbestrol - A3: Methyltestosterone |
| 3 | Hatchery waters | - A6: CAP |
| 4 | Raw materials at middlemen | - A6: CAP |

3. Scheduled sampling plan

Samples shall be monitored for harmful substances residues throughout the aquaculture, the sampling based upon production volume will be carried out as follows:

- For intensive shrimps farming: the rate will be 1 sample / 100 tons of produce for black tiger shrimps; 1 sample / 150 tons for white shrimps. There is a difference between these rates because white shrimps are now intensively farming with high density and production (an average of 8-12 tons/ha, doubled compared to black tiger shrimps production). Consequently, the rate applied to white shrimps is adequate to an effective control of chemicals and antibiotics residues.

- For extensive shrimps farming: this farming method is only applied in several provinces with large water surface and saline forest for aquaculture; farmers localize big tidy areas (over 5 ha) and use natural breeds. With big aquaculture areas and low raising density, farmers do not use feeds and veterinary drugs for fish disease prevention/treatment in this case. Therefore, farmers applying this aquaculture method never feed and treat the fish with veterinary drugs. For this reason, for extensive shrimps farming, the sampling will be carried out to test for environmental contaminants (B3a, B3c) with a frequency of 1-2 samples/area/year at the time of commercial-sized products.
- For Tra catfish: The rate is 1 sample / 500 tons of produce. A such low rate has been proposed due to the super-intensive farming method at 1-hecta farm with 300-500 tons/ha of production. an actual The low sampling rate is applied due to the super-intensive farming with a productivity of 300-500 ton/ha. For this reason, the proposed rate can assure the effective control of chemical and antibiotics residues on Tra catfish.

Samples must be taken in compliance with procedures described in the Practice Manual of the Monitoring Program in order to ensure the accuracy of testing results and reflect the current situation of farming areas.

Sampling plan scheduled for 2012 are showed in Table 6.

Table 6: Number of samples to be taken by species

| | | Estimat categoriz | Number of | | |
|-----|------------------------------|-------------------------|-------------------------|------------------------------|---------------------------|
| No. | Farmed fish / Others species | Intensive farming (ton) | Extensive farming (ton) | Total production (ton) | samples to be taken |
| 1 | Tra catfish | 767,366 | - | 767,366 | 1,539 |
| 2 | Tilapia | 38,468 | _ | 38,468 | 162 |
| 3 | Climbing perch | 14,750 | - | 14,750 | 52 |
| 4 | Snakehead | 5,845 | - | 5,845 | 58 |
| 5 | Feather back fish | 2,900 | - | 2,900 | 29 |
| 6 | Four-eyed sleeper | 800 | - | 800 | 5 |
| 7 | Grass carp | 580 | _ | 580 | 5 |
| 8 | Black tiger shrimp | 148,904 | 126,261 | 275,165 | 1,430 |
| 9 | White shrimp | 154,679 | - | 154,679 | 953 |
| 10 | Giant prawn | 2,263 | _ | 2,263 | 23 |
| 11 | Crab | 1,835 | - | 1,835 | 18 |
| 12 | Raw materials at middlemen | - | - | - | 166 |
| 13 | Juvenile catfish | _ | - | - | 139 |

| 14 | Hatchery water | 1,118,390 | 126,261 | 1,244,651 | 4,579 |
|----|----------------|-----------|---------|-----------|-------|
| | Total | 767,366 | - | 767,366 | 1,539 |

4. Sampling plan and criteria to be tested by groups

- Intensifying the sampling of farmed fish for CAP and NTRs.
- Intensifying to test farmed fish for Enrofloxacine/Ciprofloxacin Quinolones residues.
- Reducing number of follow-up samples for Tetracylines, B3d, B3e, Florfenicol.
- Continuing to intensively test Tra catfish for Trifluralin, together with Group B2a.
- Removing tests for Crystal Violet/Leucocrytal Violet Group B3e because the 3-year monitoring results did not show any violation and no-consignments have been notified.

Table 7: Sampling plan for 2012

| | | Committee | | | | Nur | nber (| of sam | oles to | be ana | lvsed up | Number of samples to be analysed upon testing groups | sano | | | | |
|-----|-----------------------|-----------|----|----|-------|-----|--------|--------|---------|--------|----------|--|------|-----|-----|-----|----------|
| No. | Substrates | to be | 1 | 5 | A6 | | | | B1 | | 3 | B2a and | | | | | |
| | | taken | AI | & | CAP | NF | TC | Sul | Qui | Flor | Trime | Triffuralin | B3a | B3c | B3d | B3e | |
| - | Tra catfish | 1,539 | 47 | 46 | 250 | 228 | 64 | 182 | 189 | 64 | 65 | 121 | 59 | 59 | 74 | 106 | |
| 2 | Tilapia | 162 | 10 | П | 28 | 23 | 9 | 17 | 22 | 8 | 7 | 21 | 12 | 12 | 5 | 12 | <u> </u> |
| 3 | Climbing perch | 52 | | | 11 | 8 | 2 | 9 | 9 | 2 | 2 | 3 | 2 | 2 | 2 | 4 | |
| 4 | Snakehead | 28 | 3 | 3 | 8 | 8 | 3 | 4 | 9 | 3 | 3 | 4 | 3 | 3 | 3 | 4 | |
| 3 | Feather back fish | 29 | _ | | 5 | 4 | _ | 3 | 4 | - | _ | 2 | 2 | 2 | _ | - | |
| 9 | Four-eyed sleeper | v | 0 | 0 | 2 | | 0 | | - | 0 | _ | | _ | | 0 | _ | |
| 7 | Grass carp | S | - | - | | 0 | - | 0 | _ | - | 0 | 2 | 2 | 2 | 0 | 0 | |
| ∞ | Black tiger shrimp | 1,430 | 0 | 0 | 284 | 278 | 55 | 190 | 211 | 54 | 59 | 107 | 74 | 75 | 62 | 09 | |
| 6 | White shrimp | 953 | 0 | 0 | 155 | 188 | 35 | 118 | 165 | 13 | 51 | 150 | 99 | 99 | 29 | 71 | |
| 10 | Giant prawn | 23 | 0 | 0 | 4 | 5 | 1 | 1 | 3 | _ | 1 | 2 | 3 | 3 | | | |
| 11 | Crab | 18 | 0 | 0 | 3 | 5 | 0 | æ | 3 | 0 | | 4 | 3 | 4 | | 3 | |
| 12 | Raw materials | 991 | 0 | 0 | 169 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| 13 | Hatchery water | 139 | 0 | 0 | 139 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| | Total | 4,579 | 63 | 63 | 1,059 | 748 | 168 | 525 | 611 | 147 | 191 | 417 | 227 | 229 | 178 | 263 | |

Note: CAP - Chloramphenicol; NF - Nitroflurans; TC - Tetracyclines; Sul - Sulfonamides; Qui - Quinolones; Trime - Trimethoprim; Flo - Flofenicol;

5. Testing plan by groups

(please see Annex I)

PART III CONCLUSION

The residues monitoring program for certain harmful substances in aquaculture fish 2011 was set up and implemented in accordance with the regulations promulgated by the Decision No. 130/2008/QD-BNN of 31 December 2008 of the Ministry of Agriculture and Rural Development, procedures as described in the Practice Manual for residues control as well as relevant guidance published by the National Agro-Forestry-Fisheries Quality Assurance Department (NAFIQAD), which are also in compliance with EC regulations.

The setting up of the Plan 2012 is based upon EC relevant legislation documents/guidance on the establishment of the Third Country Residue Monitoring Program, implementation results of the program 2011 as well as notifications of importing countries. This Plan can be modified in accordance with monthly reports on aquaculture status, disease situation and the use of veterinary drugs, feeds, chemicals and probiotics in aquaculture industry in Vietnam.

Cc: - European Commission;

- Competent authorities of EU member countries

- Vietnam Embassies and Trade offices in EU member countries;

- EC Delegation to Vietnam.

For the Director General SOCIALIST REPUBLIC OF THE DIRECTOR General

NAFIQAD

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Tran Bich Nga

Annex: TESTING PLAN BY GROUP

| | | | | Allinea. | ESTING FLA | MEA. JESTING PLAN BY GROUP | | | | |
|-----|-------------------------------|--------------------|--------------------|--|-------------------------|---|--|--------------------------------------|-------------|-------------------|
| Gro | Group of substances | No. of analysis | Substance | Matrices | Screening method | Confirmatory method | LOD by screening method (ppb) | LOD by confirmat ory method | MRLs (ppb) | Laborat |
| A1 | Stilbenes | 63 | Diethylstilbestrol | Fish meat | , | LC/MS/MS ((RIVM method, in-house method) | | (ppb) | | NAFI 4,6 |
| | | | | To the state of th | ELISA (kits instruction | | 0.5 | ı | QN | NAFI 6 |
| A3 | Steroids | 63 | Methyltestosterone | Fish meat | - | LC/MS/MS (RIVM method, in-house | 1 | 0.2-0.5 | ND | NAFI 4 6 |
| A6 | Chloramphenic ol+ Nitrofurans | 1.857 | | | | method) | | | | |
| | | | | Fish meat | FI ISA (Lite | | | | Q N | |
| | Chloramphenic ol | 1.059 | Chloramphenicol | hatchery | instruction manual) | 1 | 0.2 -0.3 | | | NAFI 1,2,4,5,6 |
| | | | | Fish meat, hatchery | | LC/MS/MS (in-house method) | ı | 0.1 | N O N | NAFI |
| | Nitrofurans | 747 | | Hatel | | | | | | 2,3,4,5,6 |
| A6 | Furaltadone metabolite | 747 | AMOZ | | | | | | ND | |
| | Furazolidone metabolite | 747 | AOZ | 310 | | | | 0.1-0.5 | | NAFI 1, |
| | Nitrofurantoin metabolite | 747 | AHD | Fish meat | ı | LC/MS/MS (Rilkilt- Dutch, in-house method) | | | | 2666 |
| | Nitrofurazone metabolite | 747 | SEM | | | | | 0.3-1.0 | | NAFI 2.4.5.6 |
| B1 | Tetracycline | 891 | Oxytetracycline | Fish meat | | LC/MS/MS (in-house | | 00 01 | 001 | |
| | | | Tetracycline | | | method) | | 07-01 | 001 | NAFI 12345 |
| | | | | | | | | 10-50 | 100 | ، ۲۰۰۲، کروشه، ۱ |

| Grou | Group of substances | No. of analysis | Substance | Matrices | Screening | Confirmatory method | LOD by screening method (ppb) | LOD by confirmat ory method (ppb) | MRLs (ppb) | Laborat ory |
|--------|---------------------|--------------------|----------------------|------------|-------------|---|-------------------------------|-----------------------------------|---------------|--------------------|
| | | | | | | | | | | 9 |
| | | | Cinrofloxacin | | | | | 2-10 | 100 | |
| | | | Furofloxacin | | | | | 2-10 | | |
| | | | Linonovaca | | | HPLC-FLD, LC/MS/MS | | 0.5 | 600 for fish, | NA CI |
| | | , | Difloxacin | D. 1 | ELISA (kits | (in-house method, FDA, | 5-10 | 01-7 | fisheries | 1.2.3.4.5. |
| | Quinolones | 011 | Sarafloxacin | F180 MEat | manual) | analysis, Vol. II, No 2, | 2 | 2-10 | 300 | 9 |
| | | | Danofloxacin | | | 2003, page 114-127) | | 0.2-10 | 30 | |
| | | | Flumeauin | | | | | 3-10 | 100 | |
| | | | Oxolinic acid | | | | | 5-10 | 100 | |
| | | | Sulfadiazine | | | HPI C-FI D I C/MS/MS | | | | |
| | | | Sulfathiazole | | | (AOAC vol.86, | | | | N F |
| | | 1 | Sulfadimidine | - | | No.3,2003, in-house | | 10-30 | 100 | 123.4.5. |
| | Sulfonamides | 525 | Sulfamethoxazole | Fish meat | | method, Journal of | | 2 | 2 | 6 6 |
| | | | Sulfadimethoxine | | | chromatography A, 898 | | | | |
| | | | Sulfachlorpyridazine | | | (2006) 95-102) | | | | |
| | | | | | | HPLC-PDA, LC- MS/MS (in-house | | | ζ. | NAFI |
| | Trimethoprim | 191 | Trimethoprim | Fish meat | 1 | method, Journal of chromatography A, 898 (2000) 95-102) | ı | 10 - 20 | 00 | 6 6 6 7 9 9 9 9 9 |
| | Florfenicol | 147 | Florfenicol | Fish meat | ı | LC/MS/MS (in-house method) | ı | 0.1 | 1000 | NAFI 1,2,3,4,5, |
| B2a | | - | Praziquantel | Fich most | 1 | LC/MS/MS (in-house method) | ı | ı | 1 | NAFI 4 |
| and | Antheimintics | 410 | | FISH INCAL | HPLC/UV | | 20 | 1 | | NAFI 6 |
| -ralin | 1 Trifluralin | 416 | Trifluralin | Fish meat | t | GC/MS (AOAC | 1 | 1.0 | 100 | NAFI 2, |
| | | | | | | | | | | • |

| Laborat | 4.5.6 | | | | | | NAFI 4 | | | | 1 | | | | | NAFI 6 | | | | | | NAFI 6 | |
|--|-------------------|-------------------|--------|----------|--------|--------------|-------------|-----------|----------------|-----------|----------------|----------|--------|------------|--------------|---------------|-------------|---------|------|------------------|-----------------|------------------|---------------------------------|
| MRLs (ppb) | | | 000 | 700 | 200 | 50 | 200 | 1000 | 50 | 200 | 1000 | 200 | 200 | 50 | 200 | 1000 | 50 | 200 | 1000 | 300 for fish, | 500 for shrimps | 500 | 50 for fish, 500 for shrimps |
| LOD by confirmat ory method | (qdd) | | | | | | 0.7 - 5 | | | - | | 2 | 2 | 2 | 2 | 10 | 5 | 2 | 2 | 25 | | 01 | 5 |
| LOD by screening method (ppb) | | | | | | | , , , , , , | | | | | | | | ! | | | | | 1 | | ı | 1 |
| Confirmatory method | 2007.01, in-house | method) | | | | GC-FCD (AOAC | 2007.01) | | | | | | | | GC-ECD/GC-MS | (AUAC 983.21) | | | | AAS (AOAC 972.23 | (5,67,67 | AAS (AOAC 974.14 | AAS (AOAC 973.34 1995) |
| Screening | | | | | | | | | | | | | | | 1 | | | - | | t | | | |
| Matrices | | | | | | Pich ment | rish meat | | | | | | | | Fish meat | | | - | | Fish meat | | | |
| Substance | | | Aldrin | Dieldrin | Endrin | Heptachlor | DDT | Chlordane | BHC | Lindane | Aldrin | Dieldrin | Endrin | Hentachlor | DDT | Chlordane | BHC | Lindane | | Pb | | 8H | РЭ |
| No. of analysis | | 897 | | | | | | | 1 | 727 | 1 | 1 | | | <u> </u> | | 1 | 1 | | | 220 | 777 | |
| Group of substances | | B3a+B3c+B3d + B3e | | | | | | | Organochloring | compounds | including PCBs | | | | | | | | | | Chemical | elements | |
| Grou | | B3a+ | | | | | | | | B3a | | | | | | | | | | | B3c | | |

| Laborat ory | NAF! 1,2,5,6 | NAFI 1, 2,3,4,6 NAFI 5 |
|---|---|--|
| MRLs (ppb) | 4 | ΩN |
| LOD by confirmat ory method (ppb) | 0.3-1 | 0.5 |
| LOD by screening method (ppb) | | 1 1 |
| Confirmatory method | HPLC (AOAC edition 1997, Volume II, chapter49, page 18-19, in-house method) | LC/MS/MS (AOAC international Vol.78, No.6,1995, Journal AOAC International Vol.88, No.3, 2005) |
| Screening | | 1 |
| Matrices | | Fish meat |
| Substance | Aflatoxine (B1) | Malachite Green/ Leucomalachite Green |
| No. of analysis | 178 | 263 |
| Group of substances | Mycotoxins | Dyes |
| Group | B3d | B3e |