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Ha Noi, 29 April 2009

CIRCULAR LETTER
**Stipulations on veterinary hygiene monitoring and surveillance for
bee honey manufacture and trade**

Subject to

Veterinary Ordinance dated 29 April 2004;

Decree No 33/2005/NĐ-CP dated 15 March 2005 of the Government stipulating the detail implementation of some items of Veterinary Ordinance;

Decree No 01/2008/NĐ-CP dated 03 January 2008 of the Government stipulating functions, duties, powers and organization of Ministry of Agriculture and Rural Development (MARD);

Decree 119/2008/NĐ-CP dated 28 November 2008 of the Government amending and supplementing some items of Decree No 33/2005/NĐ-CP dated 15 March 2005 of the Government stipulating the detail implementation of some items of Veterinary Ordinance;

Ministry of Agriculture and Rural Development (MARD)

hereby stipulates that

Chapter I
GENERAL PROVISION

Article 1. Scope and subjects

1. Scope

This circular letter stipulates the monitoring and surveillance of bee honey manufacture and trade including establishing monitoring and surveillance plans and implementation, monitoring and surveillance system on veterinary medicinal

products (VMPs) and feeds used for bee keeping, violation dealing and responsibilities of related organizations in the implementation.

2. Subjects

This circular letter applies to Vietnamese and overseas organizations and individual that are related bee honey manufacture and trade.

Chapter II

VETERINARY HYGIENE MONITORING AND SURVEILLANCE

Article 2. Plan establishment and implementation

1. Plan establishment

Department of Animal Health (DAH) shall establish annual plans on monitoring, surveillance and submit to MARD for approval and grant of expense to implement.

2. Plan implementation

After MARD approves the plan and grants expense, DAH organizes to implement the plan on monitoring, surveillance and sample analysis; simultaneously reports to MARD results of monitoring, surveillance and sample analysis last year and the plan for next year; informs competent authority of importing countries when required.

3. Department of Planning, Department of Finance, Department of Science, Technology and Environment, Department of Agricultural, Forest and Aquatic Product Quality Management (DAFAQM) cooperate with DAH to establish and implement annual plans on monitoring, surveillance and sample analysis of bee honey.

Article 3. Time to implement the plan on monitoring, surveillance and sample analysis.

1. Bee honey and feed samples shall be taken in bee honey manufacturers and trading companies and feed producers for bee in February-April and October-December every year.
2. The quantity and type of samples will be followed the established plans. In necessary cases, unscheduled sampling and check can be carried out.

Article 4. Organizations implement sampling and sample analysis

The National Center for Veterinary Hygiene Inspection No.I (NCVHI No.I) shall carry out the sampling and testing for toxic residues e.g. chloramphenicol, nitrofurans, streptomycin, tylosin, tetracycline and others according to the established plans.

Article 5. Sampling and sample analysis

The sampling, quantity of samples and residue tests shall follow attached annual plans.

Article 6. Storage of analysis results

The results of sample analysis shall be recorded and kept at analysis laboratories and sent to related authorities.

Article 7. Pre-export sampling

The pre-export sampling shall be carried out according to regulations on export inspection and quarantine:

The number of samples shall depend on the batch quantity.

Analysis test shall depend on the importing countries' requirements.

Inspection and quarantine dossiers shall be kept at quarantine authorities.

In case residues have been found in the pre-export batch, manufacturers and processors shall be informed immediately and corrective measures shall be carried out according to regulations.

Article 8. The establishment of annual plans.

The establishment of annual plans that shall be sent to importer countries, the implementation of surveillance, sampling and sample analysis, reporting annual results to importing countries shall be carried out by authorities stipulated in chapter VI of this Circular Letter.

**Chapter III
MONITORING AND SURVEILLANCE SYSTEM**

Article 9. Veterinary hygiene monitoring and surveillance system in bee keeping and bee honey processing to ensure veterinary hygiene includes:

1. Department of Animal Health (DAH).
2. Regional veterinary offices.
3. National Center for Veterinary Hygiene Inspection No. I and II
4. Sub-Department of Animal Health (SDAH) in the provinces that have bee keeping activities.

Article 10. Subject for the monitoring and surveillance of bee honey manufacturing and processing.

1. Bee honey manufacturing, trading establishments.
2. Bee keeping establishments.
3. Feed manufacturing establishments for bees

Article 11. The monitoring and surveillance system that implements responsibilities shall ensure closed surveillance system from manufacture to transportation, preliminary process and process.

Article 12. Bee honey manufacturing, trading establishments and feed manufacturing establishments for bee shall be subject to the monitoring and surveillance of competent bodies and implement the monitoring and surveillance requirements during manufacture and trade.

Chapter IV

THE USE OF VETERINARY MEDICINAL PRODUCTS AND FEED IN BEE KEEPING

Article 13. Only manufacturers that meet Good Manufacturing Practice (GMP) standards be authorized to produce veterinary medicinal products (VMPs) used for bee keeping. The labels for VMPs used for bee keeping shall have relevant information as stipulated, including ingredients, indications for bee diseases as well as instruction for drug uses.

Article 14. Bee keeping organizations and individuals for export, apart from following national stipulations on VMP and feed use in bee keeping, shall implement requirements from importing countries.

Article 15. Only VMPs in the authorized list promulgated by MARD shall be used for prevention and treatment in bees and shall be diagnosed and prescribed by licensed veterinary practitioners. VMPs shall be purchased in licensed shops.

Article 16. Indications and manufacturers' guidance shall be followed strictly when VMPs are used for bees. Bee keeping establishments shall have records on diseases and treatments for bee. Antibiotics in the list of VMPs that are banned shall be forbidden in bee keeping.

Article 17. VMPs that contain antibiotics and toxic chemicals shall be banned to be imported, produced, traded and used for prevention and treatment of bee diseases.

Article 18. Feeds used in bee keeping shall be provided with ingredients, use instructions, manufacture and expire dates. Only feeds that are licensed by competent organizations shall be circulated. Antibiotics and hormones shall be banned to be mixed in feeds for bee keeping.

Chapter V

VIOLATION DEALING

Article 19. Dealing with bee honey that does not meet criteria during monitoring and surveillance process.

1. In cases the analysis results indicate samples contain toxic residues or toxic residues exceeding tolerant limits, National Center for Veterinary Hygiene Inspection No. 1 shall:
 - a) Inform bee honey manufacturing and trading establishments of the results
 - b) Require the above establishments to apply appropriate corrective measures.
 - c) Suspend the exportation of bee honey from violated establishments.

The violated establishments shall be investigated and required to apply corrective measures to stop the causing agents; the exportation of bee honey from violated establishments shall be suspended until new harvest season of bee honey and only be continued after the causing agents have been identified and effectively corrected.

- d) Report the analysis results to DAH and inform other related veterinary offices to cooperate in monitoring and surveillance.
2. DAH shall instruct other related organizations to inspect and control violated establishments during 01 year.

Article 20. In case, toxic residues or toxic residues which exceed tolerant limits or have different origin have been found in the exported batch by the importing countries, the owners and producers shall inform DAH to cooperate with other related organizations and importing countries to discuss and find out measures to deal with the batch; the owners shall have to pay all the fees related to the dealing with the batch.

Chapter VI

IMPLEMENTATION

Article 21. Responsibilities of DAH

1. Shall guide Sub-Department of Animal Health (SDAH) relating bee keeping to carry out monitoring and surveillance activities on manufacture and use of veterinary medicinal products (VMPs) in bee keeping.
2. Shall cooperate with Vietnam National Apiculture Association, bee honey producers and traders to train and instruct bee farmers to use VMPs in apiculture.

3. Shall give the guidance on measures to deal with violations on the use of forbidden antibiotics in bee keeping.
4. Shall follow up activities of establishments that produce and trade bee honey for exportation in the monitoring and surveillance system;
5. Shall cooperate with Vietnam National Apiculture Association to recommend and organize the annual inspection; only establishments that meet stipulation requirements are allowed to produce and trade bee honey for exportation.
6. Shall collect and analyze the information and regulate the activities to suit requirements.
7. Shall recommend regulations and measures on violations in bee honey production, trade and export.
8. Prepare annual plans and reports on the plan implementation, regulations and corrective measures on violations in bee honey production, trade and export to importers.

Article 22. Responsibilities of Vietnam National Apiculture Association (VNAA)

VNAA shall cooperate with DAH and other related organizations to:

1. Establish and update the list of dossiers and codes for bee keeping establishments, bee honey manufacturing and trading companies for export.
2. Organize trainings for bee honey manufacturing and trading companies for export and bee keeping establishments to implement HACCP, GMP, VietGAP and stipulations, guidance in bee keeping, honey producing and trading process to meet the requirements from importers on veterinary hygiene and ensure food safety for consumers.
3. Deal with violations in bee keeping, honey producing and trading process.

Article 23. Responsibilities of Regional Veterinary Offices (RVOs)

1. Shall implement duties on monitor and surveillance of bee honey manufacture and process in concerned establishments within the region.
2. Shall implement the pre-export testing and issue exportation health certificates for bee honey on the request of importers.
3. Shall implement corrective measures on violations during bee honey manufacture, process and exportation.
4. Shall report results to DAH and other related parties.

Article 24. Responsibilities of Sub-Department of Animal Health (SDAH)

1. Shall implement monitor and surveillance activities on VMPs manufacture and use in bee keeping within the region.
2. Shall corporate with authorities belonging to DAH to implement monitor and surveillance activities in bee honey manufacturing and trading establishments within the region.
3. Shall impose a fine on violators who use banned antibiotics in bee keeping according to legislation.

Article 25. Responsibilities of National Centers for Veterinary Hygiene Inspection I and II

1. **National Center for Veterinary Hygiene Inspection No. I:** Shall plan and implement annual schemes and sample analysis according to plans that have been informed to importers; shall collect and report data to DAH after samplings; shall implement awareness raising programs for bee farmers; distribute and guide on applying Good Animal Husbandry Practice (GAHP). Shall establish documentation files for companies that produce and trade bee honey for export and archive system to keep related information.
2. **National Center for Veterinary Hygiene Inspection No. II:** Shall take part in the inspection in bee keeping and honey bee processing establishments for exportation; shall implement awareness raising programs for bee farmers; distribute and guide on applying GAHP.

Article 26. Responsibilities of exported bee honey processing companies.

1. Shall implement regulations on Good Manufacturing Practice (GMP).
2. Shall carry out sampling and send samples for analysis according to annual plans.
3. Shall establish documentation systems to follow the origin of each batch in order to allow traceability.
4. Shall corporate with competent authorities in monitor and surveillance of bee honey produce in related establishments.
5. Shall organize training to increase knowledge for bee farmers; exchange the information with bee farmers in order to timely deal with violations during manufacturing process.
6. Shall inform concerned organizations of manufacturing results, violations and corrective measures and other relating information.

Article 27. Responsibilities of bee honey manufacturing establishments

1. Shall implement stipulations on GAHP.
2. Shall not use banned antibiotics in bee keeping.
3. Shall use only VMPs that have been authorized by MARD
4. Shall regularly inform competent authorities and related organizations of bee diseases and bee honey manufacturing situation in order to have suitable measures.
5. Shall establish the list to follow up each bee flock in order to allow traceability.

Chapter VII Implementation effect

Article 28. Implementation effect

This Circular letter takes effect 45 days from the signing date.

To:

- Department of Legislation Document Check (Ministry of Justice);
- EU office in Hanoi;
- EU office in Brussels (Belgium);
- Departments: Legislation, Planning, Finance (MARD)
- Departments: DAH, DAFAQM;
- Divisions belongs to DAH;
- Concerned SDAHs;
- Vietnam National Apiculture Association;
- Joint stock central bee Company;
- Honey production, trading enterprises;
- VMP production, trading enterprises;
- feed producers for bee;
- Filed at Administration-Personnel, Quarantine Division.

**FOR MINISTER OF AGRICULTURAL
AND RURAL DEVELOPMENT**

(Signed)

Diep Kinh Tan

VNAA: In this Circular letter VNAA Vietnam National Apiculture Association means Vietnamese Beekeepers Association (VBA). Noticed by VBA