

# Hvilke erfaringer har islandske myndigheter med regelverksetterlevelse i hvitfisksektoren?

Implementation of EU-legislation in Iceland - our experience!

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# One

- Good afternoon, my name is Jón Ágúst and I work at Mast in Reykjavík as an inspector.
- Have been with the agency for 15 years now mostly working as a coordinator at the main office working on instruction manuals for inspectors, reporting database and a member of the training group for new inspectors.
- So, it is back to basic for me and now I have to take my own medicine sort of speak – it can't be any tougher than that, can it!



# Times they are A-Changin'

- In this summary I will try to get the perspective of the inspector to the enormous changes they faced when the European legislation was implemented in Iceland.
- Too be clear, this summary and any conclusions that I might come to are my own and do not necessarily represent the view of Mast.



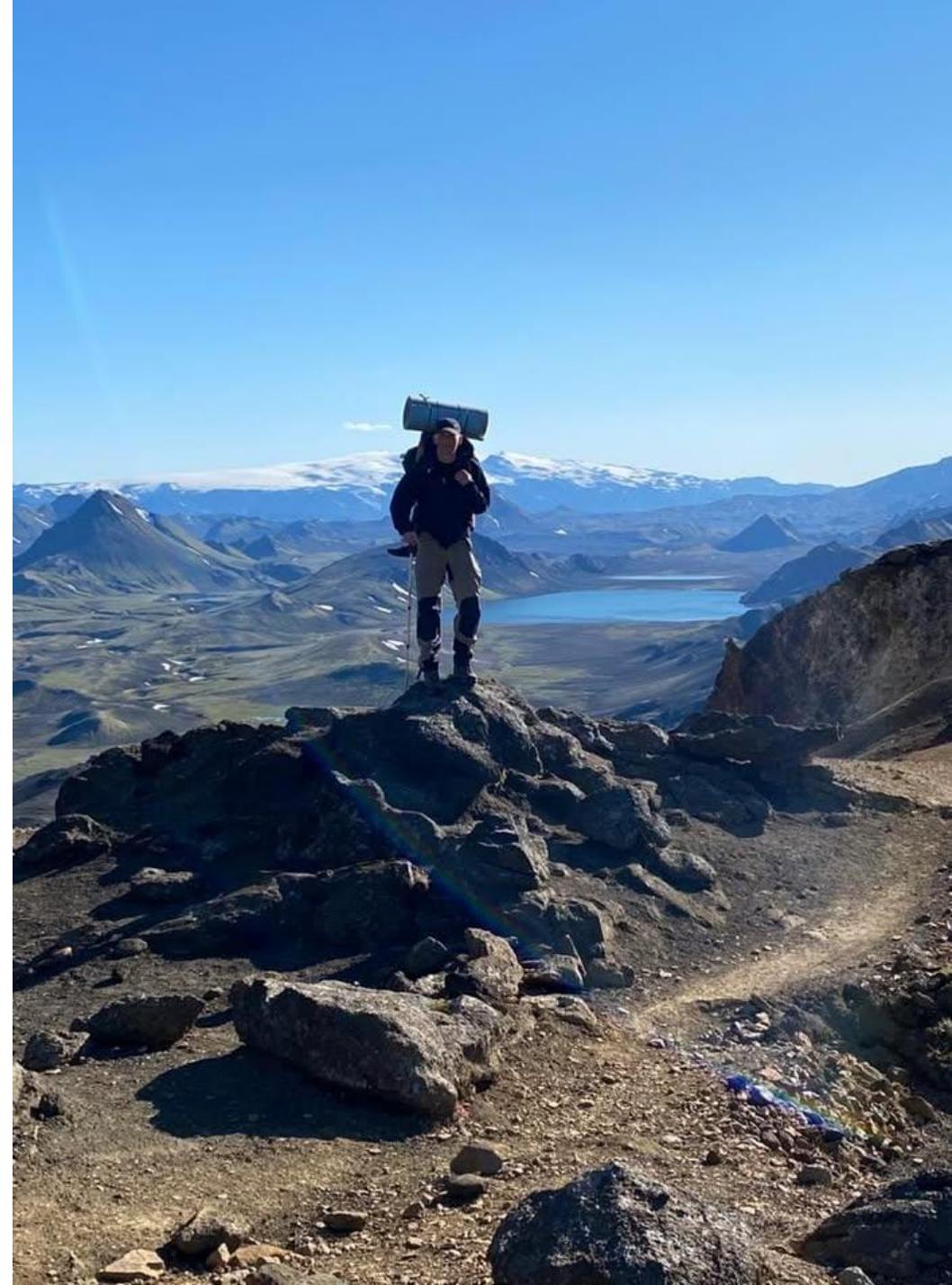
# New beginning

- The EU legislation was adopted by the Icelandic parliament in 2010 and put into action early year 2011, starting with the fish industry and gradually through out the food sector in the latter half of 2011 and through out 2012 – More or less.
- This was done though our food law from 1993 which are still in motion.
- There is a long history of exporting fish from Iceland to Europe and other countries and the fish industry had adapt to the various GHP demands of those markets before the implementation of EU-legislation.
- So GHP were in place mostly based on Codex Alimentarius

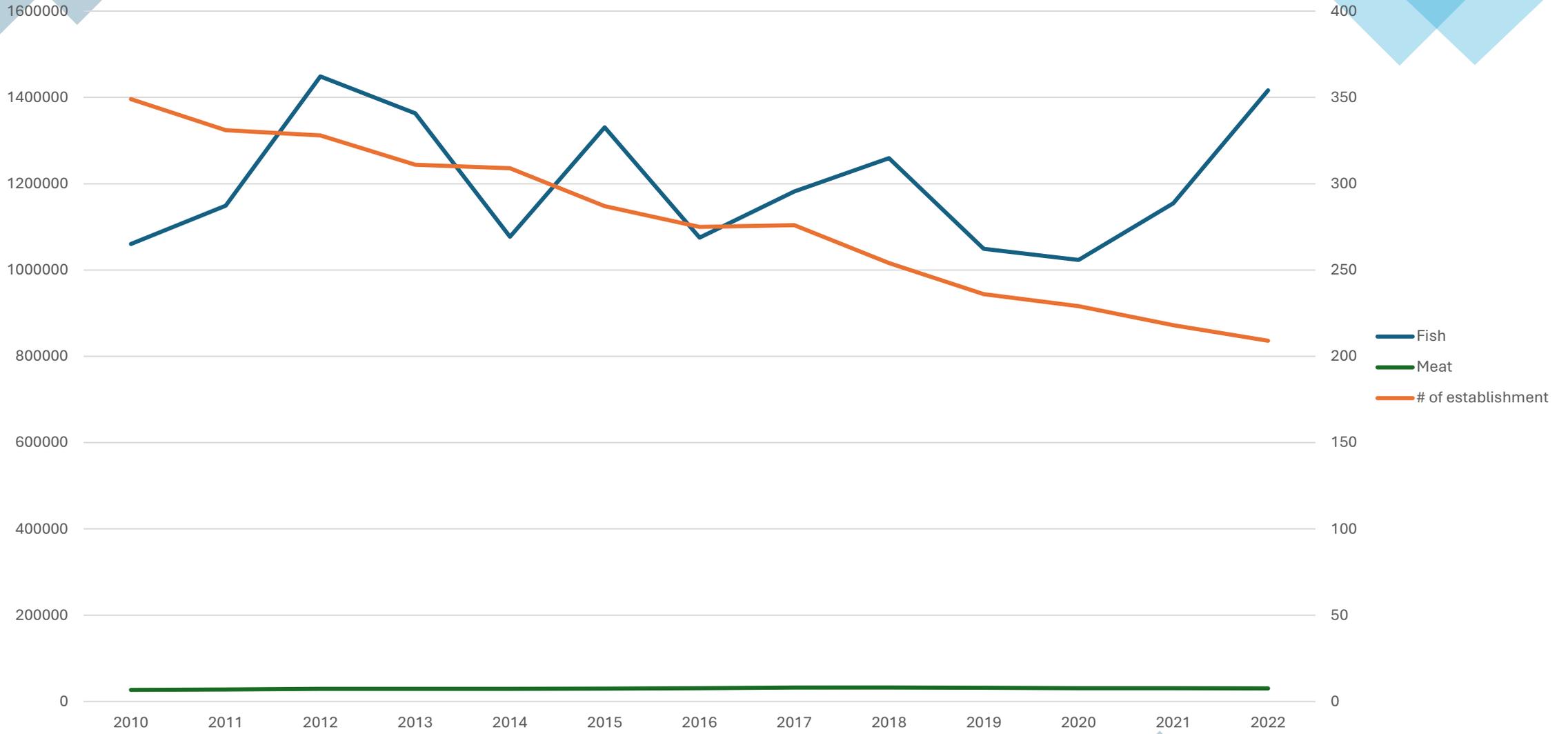


# A big task / the challenge

- The EU-legislation is designed to cover big food companies and it can be tricky to implement it in a small place like Iceland.
- But the big change from our previous approach was that the new legislation forced the FBO's to be fully responsible for food safety and the mandatory requirement of HACCP approach laid down in article 5. of regulation 852/2004.
- At the time of implementation of the EU-legislation in Iceland privately owned inspection bodies took care of inspection of the establishments and reported to the authority which oversaw the work of the inspection bodies.
- The role of official inspectors at that time was to follow up on any ,serious non-compliance' reported from the private inspection bodies.



Fishery / # establishments



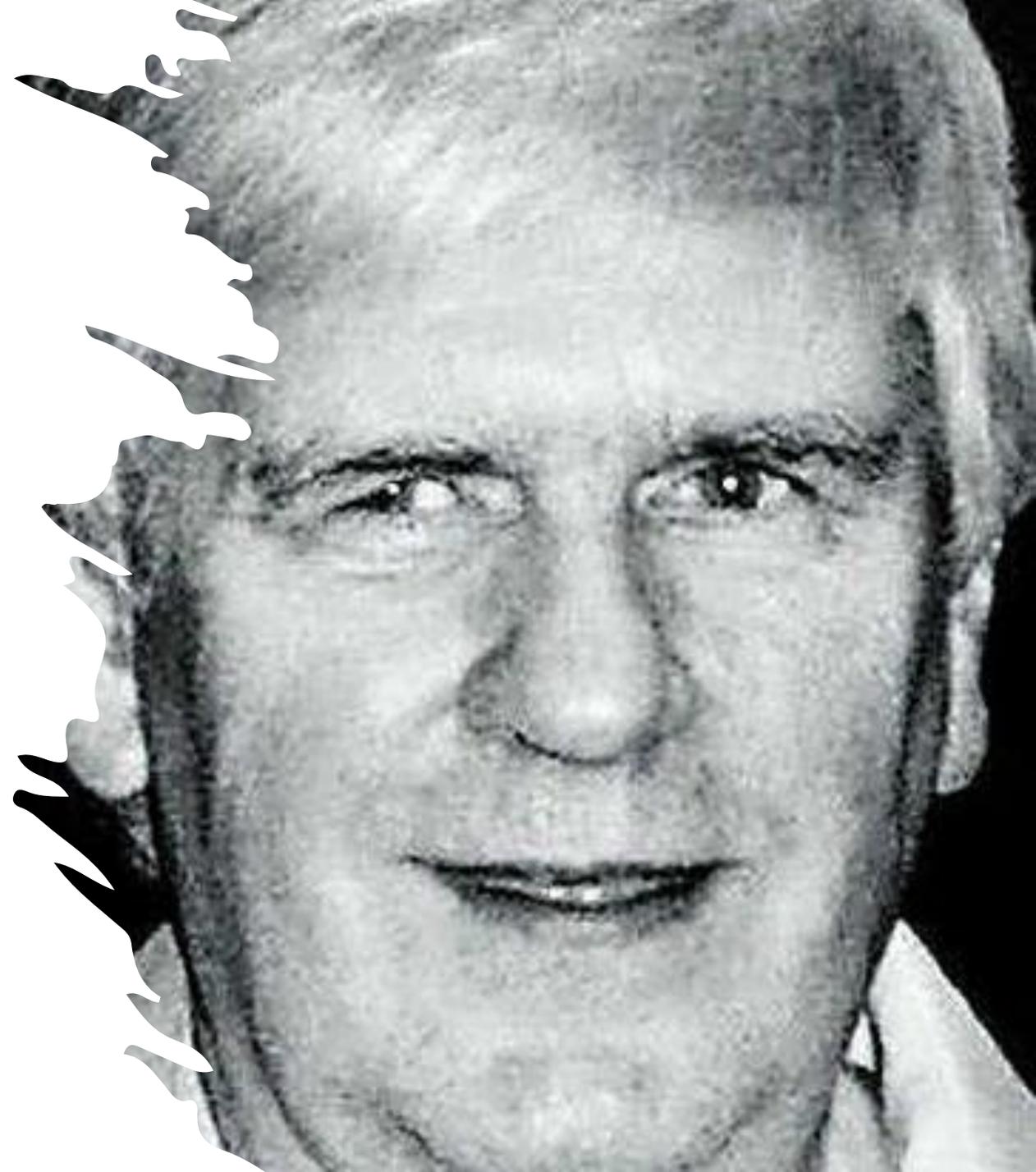
# New structure

- It was common practice for the inspectors to be in the role of consultant and the FBO's took it for granted that the inspector was there to consult rather than to inspect/audit their business.
- In the ,new' system the role of the inspector shifted dramatically from consultant to inspector/auditor with a responsibility to inform the FBO's of the content of the legislation rather than telling them how to manage their operation.
- For the organisation of MAST it was equally challenging to organise the whole inspection system from scratch in line with at the time the regulation of 882/2004 (now 625/2017).



# Relentless work - ambition

- In the making of this summary, I have thought a lot of my late colleague Garðar Sverrisson and the enthusiasm of the people who were working at MAST at the time, most of them have retired except for few of us.
- As an example, my colleague Garðar who had some health issues at the time and was recovering at a rehabilitation centre used his 'dead' time in his treatment to translate the Swedish inspection manual for food of animal origin to Icelandic.
- At the time we had to create a completely new inspection system coming from a triple copied handwritten reports and a culture of official consultancy for free.
- The requirements from the legislation are quite clear: risk-based inspection and mandatory HACCP-plan for all approved establishments.



# Long term goal

- As we talk about food culture today, we had back then to make a new inspection culture or at least try to make one. As often happens when we make new system we focus on tangible elements and make a lot of rules to achieve them and that can lead to uniformity and loss of clarity.
- We were so optimistic at the time that not only we had to construct a new surveillance system and implement it accordantly we lined up a series of additional inspection projects as a focus on various food safety factors. That often included the eleven local competent authority which by law MAST is obligated to coordinate.
- But as it happens although it is 16 years now, we have achieved a lot and maybe it is not so long time after all to implement a system like we have done with given resources. It is important to have a long term goal to be able to create the culture needed to have a balanced approach to the subject of food safety.



# Risk based inspection

- The challenges for the inspectors in the new environment were met with serenity and open mind although scepticism epically towards the setup of the risk-based inspection has been constant during the whole time up to now.
- The regulation 625/2017 gives a good guideline of how to approach FBO's with various types of surveillance s.a. Inspection / audit / investigation
- In practice we have not yet distinct between different surveillance methods although we do sometimes audits separately.
- As the politicians keep coming up with new tasks such as to merge the competent local authority and Mast with in one year - we will need enthusiasm and serenity.
- Regardless who is in charge I still sense the enthusiasm within our organization towards the task to improve and evolve our surveillance system towards our common goal of food safety. And that's what matter!



# Where to go!

- This also put a lot of strain on inspectors who had worked in this environment and were used to taking 'responsibility' for the FBO's in question. The transition went unevenly and took time.
- One fundamental question that rose in connection with this very issue was when we at MAST asked ourselves "Can we trust that FBO's managers and will they follow the rules and can they carry out their activities without us' the experts' getting involved"?
- And directly following "What is our role if we are not supposed to say how the arrangements should be"!



# Instruction/guidance Vs. Consultancy

- Two roles
- Support
- Clarity
- My way or MAST way



# Commitment on Food safety

- As the bulk of establishments are small in Iceland and the concept of flexibility has been one of our most challenging issues.
- And to keep the balance between all the demands within the legislation and how to evaluate each and every establishments environment and resources.
- We need flexible attitude to our assignments and more commitment from the management to food safety - should not be taken for granted.
- But I believe with a firm, calm and positive attitude we make the job done.



# Ongoing education



## Better Training for Safer Food

- A big part of our mostly successive implementation of the legislation is ongoing training/learning. As it comes to the legislation itself the EU program BTSF has lead a huge role in our ongoing education of the legislation.

CERTIFICATE

Dr. Gunnlaugsson

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of lectures and 14 hours of practical work

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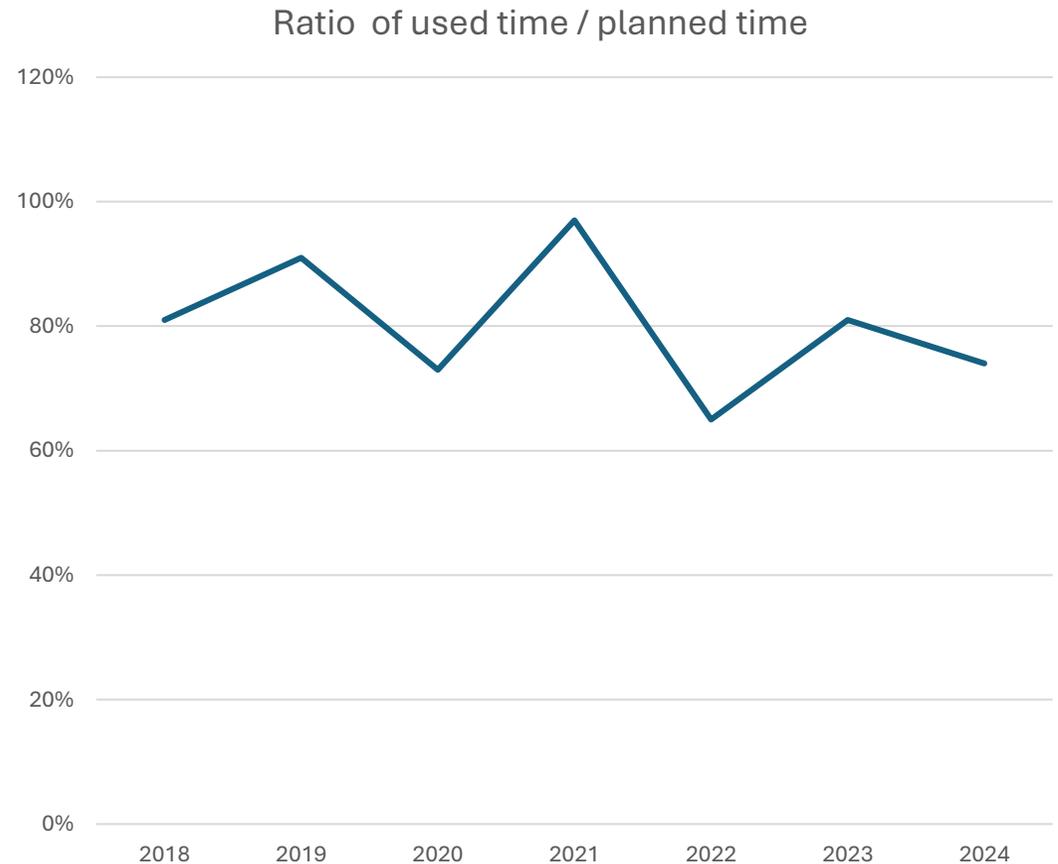


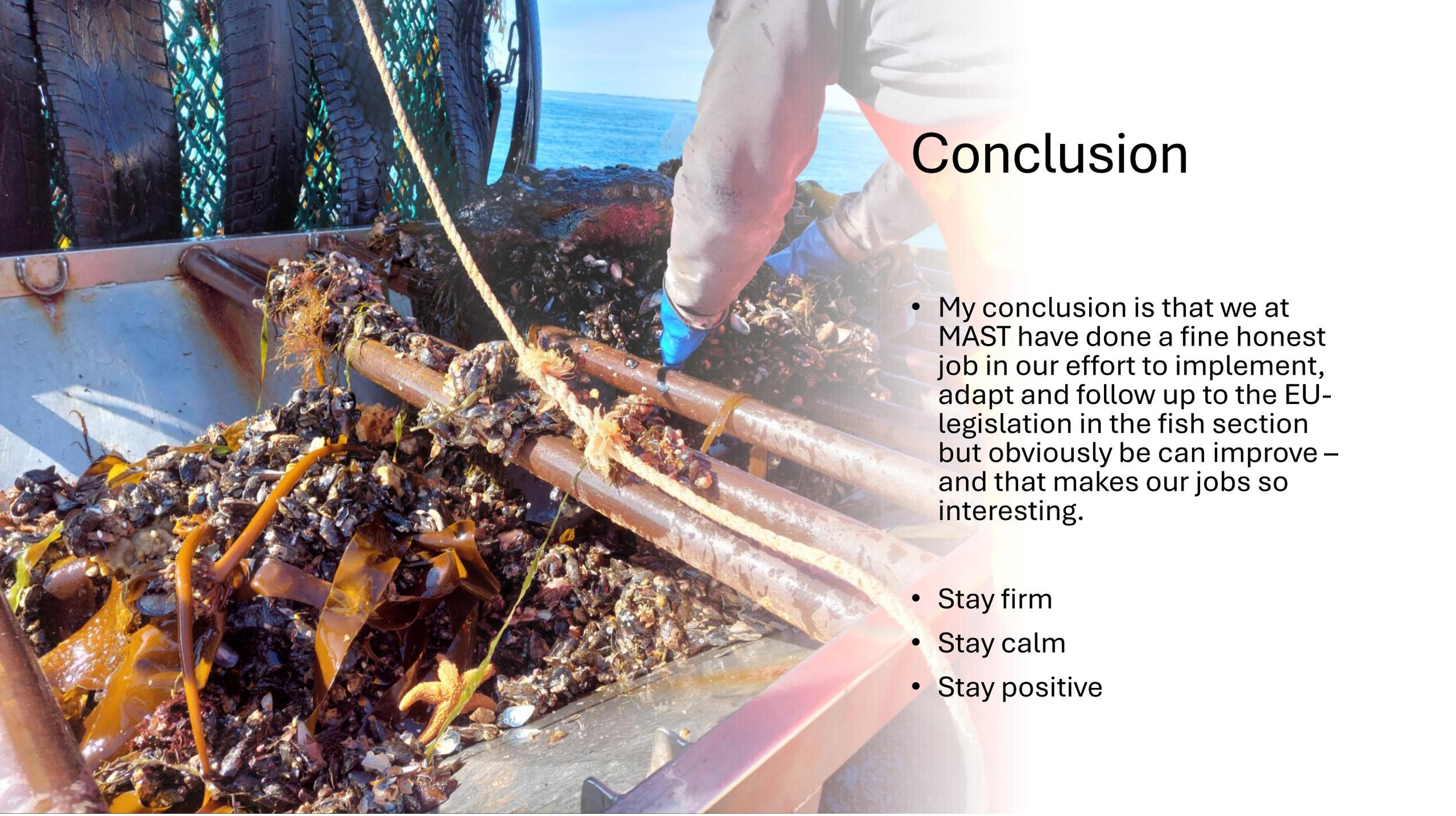
## FBO's challenges

- Challenges were and still are a few and often the same.
  - Respect for food safety
  - Commitment to best practices
- Responsibility – legislation.
- Food culture, role of the management.
- Standards – Markets outside EU, serves as a motive for improvements.

# How to measure success

- MANCP Control objectives
  - Mostly efficiency measures
  - Few effectiveness measures
- Are we doing what we are say we are doing and what we are suppose to be doing
  - Results of internal audits (2016)
    - 3 related to fish
  - Results of audits performed by ESA (2015)
    - 3 related to fish
  - Several external audits from EAEU(2014)
  - and China
- No major outstanding non-compliances



A fisherman wearing a grey jacket and blue gloves is working on a boat, handling a large catch of fish and seaweed. The fish are piled on a metal tray, and the seaweed is dark brown and yellow. The background shows the blue ocean and a clear sky. The text 'Conclusion' is overlaid on the right side of the image.

# Conclusion

- My conclusion is that we at MAST have done a fine honest job in our effort to implement, adapt and follow up to the EU-legislation in the fish section but obviously we can improve – and that makes our jobs so interesting.
- Stay firm
- Stay calm
- Stay positive