
INFORMATION NOTE

Regulations for the Import of Live Fish for Human Consumption in Singapore

1. Background

1.1 The purpose of this information note is to provide Members of the Panel on Food Safety and Environmental Hygiene with information on measures adopted by the Singaporean government to regulate the import of live fish for human consumption.

1.2 The majority of Singapore's fish supply comes from abroad. In the period between 1999 and 2004, the average ratio of import to local production in fish supply was 94:6.¹ The neighbouring Indonesia, Malaysia and Thailand account for around 70% of the total fish supply and these fishes are imported into Singapore by sea and land.² Fishes imported by air come from other places in the world such as Australia and China. In the fiscal year 2003-04, the Agri-Food and Veterinary Authority (AVA), the national food safety authority of Singapore, issued 174 579 import permits for the importation of fish and fishery products³.

1.3 Imported fish and fishery products are distributed to consumers mainly via public markets and supermarkets. The retail market share of fish and fishery products between public markets and supermarkets is about 70% and 30% respectively.⁴

1.4 The following dimensions of the Singaporean regulatory system for the import of live fish for human consumption are examined later in this paper:

- (a) legislation;
- (b) competent authority; and
- (c) regulatory system.

¹ Department of Statistics (2005), p.95.

² Monetary Authority of Singapore (2004), p.5.

³ Section 2 of the *Wholesome Meat and Fish Act* defines "fish product" as (a) any fish or part thereof; and (b) any product or by-product of any fish, which is intended for human consumption. Under the *Animals and Birds Act*, the *Fisheries Act* and the *Wholesome Meat and Fish Act*, "fish" "includes any of the varieties of marine, brackish water or fresh water fishes, crustacea, aquatic mollusca, turtles, marine sponges, trepang and any other form of aquatic life and the young and eggs thereof".

⁴ Pizzali, pp.11-12.

2. Legislation

2.1 The following acts provide the regulatory framework for the import of live fish for human consumption:

- (a) *Agri-Food and Veterinary Authority Act*, which establishes AVA, a statutory agency that regulates the import of fish for human consumption;
- (b) *Animals and Birds Act*, which prevents the introduction into, and the spreading within, Singapore of diseases of fish;
- (c) *Fisheries Act*, which controls the use of fishing ports and harbours, and the marketing and distribution of fish that is landed directly from fishing vessels;
- (d) *Wholesome Meat and Fish Act*, which regulates the processing, packing, inspection, import, distribution, sale, transshipment and export of fish and fishery products; and
- (e) *Food Regulations* under the *Sale of Food Act*, which prescribes standards for the wholesomeness and purity of fish and fishery product.

3. Competent authority

3.1 Established in 2000 under the *Agri-Food and Veterinary Authority Act*, AVA is the competent authority to enforce the legislation to ensure a resilient supply of safe fish and fishery products for Singaporeans.

3.2 Before the establishment of AVA, the Primary Production Department and the Food Control Department were responsible for the regulation of fish imports. Since 2000, the duty of regulating the import of live fish for human consumption has been transferred from the government departments to AVA.⁵ Appendix I presents the corporate vision and mission of AVA.

3.3 The board of AVA is the body responsible for making related policy decisions. The 11 board members, appointed by the Singaporean government, come from the business, academic and government sectors. Under the leadership of the Chief Executive Officer, the staff members of AVA implement all policies laid down by the board.⁶ As at 31 March 2004, AVA had 811 employees.⁷

⁵ *AVA History* (2005).

⁶ Agri-Food and Veterinary Authority (2004), p.6 and Sections 5 and 15 of the *Agri-Food and Veterinary Authority Act*.

⁷ Agri-Food and Veterinary Authority (2004), p.73.

3.4 Among the four departments of AVA, the Food and Veterinary Administration and the Food Supply and Technology Department are responsible for the enforcement of regulatory measures for the import of live fish for human consumption. Appendix II is the organizational structure of AVA.

3.5 The organizational units under the Food and Veterinary Administration and the Food Supply and Technology Department involved in regulating the import of live fish for human consumption are presented in the table below:

Table 1 — Organizational units that have major duties in regulating the import of live fish for human consumption

Organizational unit	Number of officers ⁽¹⁾
Food and Veterinary Administration	
Foreign Farms and Establishments Accreditation Branch of the Regulatory and Health Planning Division	3
Meat and Seafood Section of the Animal, Meat and Seafood Regulatory Branch of the Import and Export Division	6
Meat and Fish Import Inspection Branch of the Inspection Services and Epidemiology Division	16
Import Control Branch of the Food Control Division	23
Food Supply and Technology Department	
Jurong Fishery Port Management Branch of the Food Supply Division	14
Senoko Fishery Port Management Branch of the Food Supply Division	9

Note: (1) Number of officer as listed in the Singapore Government Directory.

Source: *Singapore Government Directory Interactive* (2005).

4. Regulatory system

4.1 As the national food safety authority of Singapore, AVA regulates all imported food. The critical factor employed in setting import requirements on foodstuffs is the risk of food safety hazard. A type of foodstuff or foodstuff produced at a place that is assessed having a higher risk of food safety hazard is subject to more stringent import requirements.

4.2 With regard to seafood, crustaceans and aquatic molluscs are considered having higher risk of food safety hazard than live fishes and therefore subject to more stringent import requirements. For example, a health certificate issued by the competent authority of the exporting country is a requirement for the importation of oysters to Singapore.⁸ Appendix III lists the requirements for the importation of oyster products to Singapore.

4.3 The regulatory system for the import of live fish for human consumption, in line with the basic policy stated in paragraph 4.1, consists of the following components:

- (a) landing and wholesaling of fish at designated points;
- (b) requiring licences and permits for the import of fish;
- (c) meeting document and labelling requirements for the import of fish;
- (d) conducting inspection and examination of imported fish at the point of entry; and
- (e) accreditation of foreign farms that seek to export fresh produce to Singapore.

Designated points for the landing and wholesaling of fish

4.4 In accordance with the *Fisheries (Fishing Harbour) Rules*, local and foreign fishermen must land their catch at fishing harbours specified by the First Schedule of the Rules. Jurong Fishing Harbour and Senoko Fishing Harbour are the fishing harbours designated for the landing of fish from fishing vessels.

4.5 Jurong Fishing Harbour serves as an international port for foreign fishing vessels to land their fish catch. Besides fishes landed directly from fishing vessels, fishes imported by land from Malaysia and Thailand as well as by air from other places in the world are also sold at Jurong Fishing Harbour's wholesale fish market. Jurong Fishing Harbour handles an average of 200-250 tonnes of fresh fish each day, most of them being imported fishes. Senoko Fishing Harbour, on the other hand, serves as the home base for the local fishing vessels to land their fish catch and handles an average of 40 tonnes of fresh fish each day.⁹

⁸ *Joint Study Group Report on India-Singapore Comprehensive Economic Cooperation Agreement*, April 2003, pp.47-48.

⁹ *Agri-Food and Veterinary Authority* (2005).

4.6 In addition to the landing of fish catch, the wholesale fish business is also highly centralized in Jurong Fishing Harbour. Jurong Fishing Harbour's wholesale fish market has 110 market lots whereas Senoko Fishing Harbour only has 36 market lots. The number of fish retailers, fish processors and institutional buyers (such as supermarket buyers) going to the wholesale fish markets in Jurong Fishing Harbour and Senoko Fishing Harbour daily to buy fish is 2 000 to 3 000 and 700 to 1 000 respectively.¹⁰

Licences and permits for the import of fish

4.7 Singaporeans engaging in the trading of fish and fishery products are required to be licensed by AVA. The general requirements for a person to obtain a trader licence include¹¹:

- (a) registering under the *Business Registration Act* or being incorporated under the *Companies Act*;
- (b) submitting an application form stating the details of the applicants as well as the company;
- (c) paying the annual fee of S\$84(HK\$388); and
- (d) opening a General Inter-bank Recurring Order account¹² for the payment of fees.

4.8 The trader licence is valid for trading both fish and fishery products as well as meat and meat products. Trading includes import, export and transshipment. According to the AVA 2003-04 annual report, as at 31 March 2004, 2 264 traders were registered with AVA.

4.9 In addition to the licensing requirement, traders must obtain an import permit for every consignment of fish and fishery products. An applicant for the import permit has to provide AVA with details of each consignment of fish, including information on the importing company, means of importation and product details. The licensed trader has to use TradeNet, an electronic data interchange system, to submit the import permit application to the Trade Development Board which will forward the application to the Customs and Excise Department and AVA for processing and approval. If the application is approved, the import permit will be issued electronically to the traders.¹³

¹⁰ *Agri-Food and Veterinary Authority* (2005).

¹¹ *General Explanatory Notes* (2005).

¹² A General Inter-bank Recurring Order account allows a customer of a bank to authorize the bank to deduct money from the account regularly and remit the money directly into other bank accounts designated by him/her.

¹³ *Singapore TradeNet* (2005).

4.10 With regard to foreign fishermen landing their fish catch in the designated fishing harbours, the master of a fishing vessel on arrival in Singapore is required to submit a Report of Arrival form to AVA. The prescribed form collects information about the vessel, the purpose of calling at the fishing harbour, the date of arrival as well as other relevant information.¹⁴

Document and labelling requirements for the import of fish

4.11 There are also trade documentation and product labelling requirements for the import of live fish to Singapore. When applying for an import permit, licensed traders are required to provide AVA with information about the consignment of goods as well as other relevant information¹⁵:

- (a) Central Registration numbers of trader, freight forwarder, cargo agent and shipping agent;
- (b) name of vessel and voyage number/flight number/aircraft registration number;
- (c) date of arrival;
- (d) value of consignment in Singapore dollars;
- (e) bill of lading/air waybill number/unique cargo reference;
- (f) total gross weight;
- (g) country of origin;
- (h) port of loading;
- (i) vessel type, e.g. cargo vessel;
- (j) vessel location in Singapore;
- (k) cargo packing type, i.e. bulk, conventional, container, airborne;
- (l) Harmonized System Codes¹⁶ for description of goods;
- (m) product information, such as product code and unit; and
- (n) quantity.

¹⁴ *Report of Arrival/Application for Port Clearance* (2005).

¹⁵ *Singapore TradeNet* (2005).

¹⁶ The Harmonized System Codes are used to stand for a particular commodity e.g. HS Code 03019100 stands for live trout and HS Code 03019200 stands for live eels.

4.12 In accordance with the *Wholesome Meat and Fish (Import, Export and Transshipment) Rules*, a packaged unit of fish or fishery product, with the exception of fish that is landed directly from fishing vessels, should be labelled with the following particulars:

- (a) description of the fish or fishery product;
- (b) country from which it originates;
- (c) brand name, if any;
- (d) name of establishment in which, and the date on which, the fish or fishery product was packed; and
- (e) net weight.

4.13 For fish importers, documents that are required for inspection at the border checkpoint include¹⁷:

- (a) commercial invoice which should contain the following information:
 - (i) date of issue of the invoice;
 - (ii) name and address of the supplier;
 - (iii) name and address of the importer;
 - (iv) marks and number of packaged units;
 - (v) gross and net weights and measurements for each packaged unit;
 - (vi) full description of goods; and
 - (vii) total product value for customs.
- (b) trader licence;
- (c) certificate of origin usually not required unless specifically requested as it is tacitly assumed that the origin of the product is the exporting country;
- (d) import permit; and
- (e) health certificate for high-risk seafood such as oyster but not required for the import of low-risk live or fresh fish.

¹⁷ Asia-Pacific Economic Cooperation (1999), p.79 and *Singapore TradeNet* (2005).

Inspection and examination of imported fish

4.14 Under the *Wholesome Meat and Fish (Import, Export and Transshipment) Rules*, all the documents for customs clearance should be presented to AVA officers at the checkpoint for inspection. For high-risk fish and fishery products such as oysters, they should be detained upon arrival for mandatory inspection and laboratory testing by AVA. On average, the entire testing procedure lasts for seven to ten days.¹⁸ Products under detention for laboratory examination are not to be released for sale until laboratory test results show that the products are fit for human consumption.¹⁹

4.15 For low-risk fish and fishery products, AVA officers conduct examination at the point of entry according to the procedures stated in the *Wholesome Meat and Fish (Import, Export and Transshipment) Rules*:

- (a) general examination of the whole consignment;
- (b) detailed examination of at least one basic packaged unit of the fish and fishery products; and
- (c) decision of releasing, if the consignment of fish and fishery products is fit for human consumption, or detaining the consignment if it is unfit for human consumption, pending its removal, destruction or disposal from Singapore.

4.16 AVA may intensify its inspection if needed. For instance, since 12 July 2004, AVA has stepped up its surveillance for the use of chemical preservatives for fish and fishery products. As such, sample consignments of fish and fishery products imported to Singapore are selected for inspection and a code is printed on the import permit, indicating that the consignment is selected for inspection. Importers are responsible for bringing those selected consignments to either Jurong Fishing Harbour or Senoko Fishing Harbour for inspection. AVA officers at the fishing ports then take samples from each selected consignment and test for chemical preservatives. The consignments are held in the fishing ports for one day to wait for the test result.²⁰

4.17 In the test, AVA determines whether or not any selected consignment of fish and fishery products is fit or unfit for human consumption based upon various standards, e.g. the level of chemical preservatives, heavy metals, antibiotic residues and parasites contained in the fish and fishery products. Appendix IV is a list of standards prescribed by the *Food Regulations*.

4.18 In the fiscal year 2003-04, AVA issued 174 579 import permits for and inspected 2 242 consignments of fish and fishery products. In the same financial year, the number of consignments of fish and fishery products being rejected was 13.

¹⁸ World Trade Organization (2004), p.42.

¹⁹ Agri-Food and Veterinary Authority (2004), p.19, Asia-Pacific Economic Cooperation (1999), p. 91 and *Singapore TradeNet* (2005).

²⁰ *AVA Circular to Fish Importers, 9 July 2004*. Information on the detailed procedures for sampling and testing of low-risk imported live fish is pending AVA's reply.

4.19 Although live fish for human consumption is generally classified as having lower risk of food safety hazard, AVA will impose more stringent import requirements and intensify inspection and examination when food safety hazard is detected. The following two cases illustrate this point.

Mexican case

4.20 In August 2003, an outbreak of red tide off the coast of Mexico's Yucatan State was reported. As a precautionary measure, AVA suspended the import of all fish and fishery products from Mexico. While the suspension was lifted, all fish and fishery products imported from Mexico have been required to be accompanied by a health certificate, certifying that the products were not harvested from the red-tide affected areas.²¹

Chinese case

4.21 In August 2005, AVA detected a low level of malachite green residues in samples of eels from China, the following measures were immediately adopted²²:

- (a) ordering importers to conduct a recall from the market place as a precaution;
- (b) subjecting all eel imports from China to a "hold and test" inspection regime, i.e. products can only be released after satisfactorily passing a test for malachite green residues;
- (c) requiring imports of eels and processed eel products from China to have pre-export testing for freedom from malachite green and import consignments being further tested on arrival in Singapore for verification; and
- (d) extending the intensified surveillance programme for malachite green residues to cover eels from sources other than China as well as other fish cultivated by fish farms, such as catfish, salmon and trout.

Accreditation of foreign farms

4.22 Accreditation of foreign farms is a measure used by AVA to ensure that primary products e.g. livestock, poultry, fruit and vegetable, and fish imported into Singapore are safe for human consumption.

²¹ Agri-Food and Veterinary Authority (2004), p.18.

²² Agri-Food and Veterinary Authority (2005).

4.23 Foreign farms which seek accreditation to export primary products to Singapore can submit an application to AVA. The accreditation to export is issued to those foreign farms which have passed the documentary review and the site inspection performed by AVA.

4.24 AVA reviews veterinary information on the foreign applicants to assess the veterinary standards of the relevant country and export establishments. The public health and hygiene aspects of the farms are evaluated by studying any reported veterinary diseases, the structure of the veterinary services and the code of hygiene practice of the export establishments.²³

4.25 When the documentary review has revealed the standards of the export establishments to be satisfactory, AVA will inspect the export premises with the veterinary authority of the exporting country to confirm that the export establishments can meet AVA's requirements.²⁴

4.26 Those export establishments that have passed the documentary review and the site inspection are included in the list of AVA-approved establishments which are allowed to export primary produce to Singapore. However, AVA may suspend an AVA-approved establishment from exporting its product to Singapore if subsequent inspection examination results show that the product is unfit for human consumption. The company may be removed from the list of AVA-approved establishment if its product fails continuously in meeting AVA's health standards.²⁵

4.27 Since the establishment of AVA, the accreditation programme of foreign imports has been focused on meat and poultry products. The chairman of AVA stated in the 2003-04 annual report that "*In the coming year, we will be expanding our accreditation programme to cover sources of seafood and egg products.*"

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²³ Agri-Food and Veterinary Authority (2005).

²⁴ Ibid.

²⁵ Agri-Food and Veterinary Authority (2004), p.18 and Agri-Food and Veterinary Authority (2005).

Appendix I

Corporate vision and mission of the Agri-Food and Veterinary Authority

A.I.1 Corporate vision of AVA:

To be a premier organization known for its professional expertise, excellent service and commitment towards the well-being of the nation.

A.I.2 Mission of AVA:

To ensure a resilient supply of safe food, safeguard the health of animals and plants and facilitate agri-trade for Singapore.

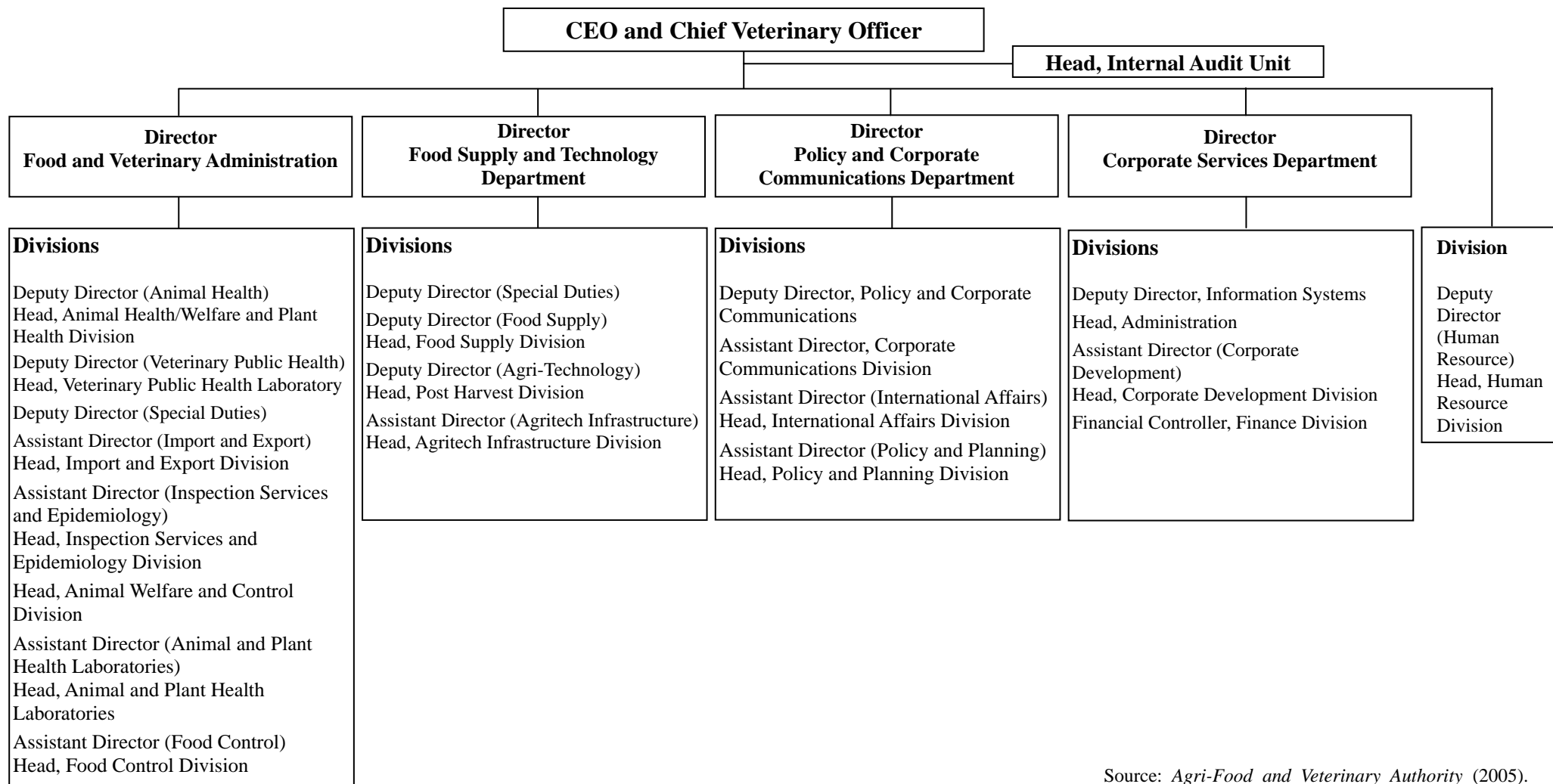
A.I.3 On behalf of Singapore and key stakeholders, it strives to:

- (a) facilitate the supply of stable, safe and wholesome meat and meat products, fish and fishery products, fresh fruits and vegetables;
- (b) safeguard the health of animals, fish and plants;
- (c) be a centre of excellence for tropical agro-technology services; and
- (d) facilitate trade in primary produce.

Source: *Agri-Food and Veterinary Authority* (2005).

Appendix II

Organizational structure of the Agri-Food and Veterinary Authority (with effect from 10 August 2005)



Source: Agri-Food and Veterinary Authority (2005).

Appendix III**Requirements/Conditions governing the import of oysters**

A.III.1 Live oysters can only be imported from Australia, Canada, France, the Netherlands, New Zealand, the United Kingdom and the United States subject to the conditions of Paragraph A.III.2, and AVA reserves the right to collect samples, without compensation to the company, from any consignment for inspection and laboratory analysis.

A.III.2 Frozen raw oysters may be imported into Singapore subject to the following conditions:

Permission to import:

Prior to import, permission to import must be obtained from AVA.

The bacteriological guidelines for frozen oysters:

- (a) Aerobic plate count less than 500 000 per gram;
- (b) Escherichia coli less than 20 per gram;
- (c) Vibrio parahaemolyticus less than 100 per gram; and
- (d) Salmonella, Shigella and Vibrio cholera nil in 50 grams.

Health Certificate:

Every consignment must be accompanied by a health certificate issued by the relevant competent authority of the country of origin, stating that:

- (a) oysters were harvested from approved waters and processed in an approved establishment/plant in a sanitary and hygienic manner;
- (b) oysters have not been treated with chemical preservatives or other additives injurious to health; and
- (c) the product is fit for human consumption.

The Health Certificate must also contain the following information:

- (a) description of the product and packaging (including brand/trade mark if any);
- (b) quantity by weight;
- (c) name and address of the processing establishment;
- (d) name(s) and address(es) of the harvesting area(s), if different from (c) above;
- (e) date of harvesting and/or freezing;
- (f) name and address of consignor; and
- (g) name and address of consignee.

Labelling:

Individual packages of oysters in the consignment must be properly labelled with at least the following information:

- (a) product description and brand, if any; and
- (b) name of consignee.

Inspection and sampling:

All consignments are required to be inspected and approved by AVA before the oysters can be released for sale. Samples for laboratory analysis are taken without compensation from each consignment imported according to the schedule below:

- (a) three sample units for a consignment that is less than 500 kg and individual package size that is more than 1 kg;
- (b) five sample units for all other cases; and
- (c) each sample unit should be at least 500 g and consist of an intact package.

A.III.3 Consignments of oysters found to contain chemical preservatives or other additives injurious to health or fail to comply with the bacteriological standards should be rejected and must either be returned to the country of origin or destroyed.

Source: Asia-Pacific Economic Cooperation (1999), pp.87-89.

Appendix IV**Limit of substance in fish for human consumption**

Substance	Limit
Mercury	0.5 ppm *
Aldrin	0.2 ppm (edible portions)
Chlordane	0.05 ppm
Lindane	1 ppm
Arsenic	1 ppm (edible portions)
Lead	2 ppm
Copper	20 ppm

Remark: * ppm = parts per million

Source: *Food Regulations.*

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