Survey of national policy and activities related to food safety in countries eligible for the Codex Trust Fund

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Executive summary

Further to an evaluation of the FAO/WHO Project and Trust Fund for Enhanced Participation in Codex (Codex Trust Fund), this report provides data on the current status of progress in food safety activities collected through a specific questionnaire sent to 60 beneficiary countries, of which 46 responded. The main objective of the Codex Trust Fund is to help low-income and lower-middle-income countries to increase their ability to participate in meetings of the Codex Alimentarius Commission, its committees and task forces (Codex meetings). Reinforced participation by developing countries in the establishment of international standards should ensure that appropriate experts in all countries of the world understand the current goals and objectives of the Codex Alimentarius Commission, and can identify the country-specific data and information necessary to participate effectively in Codex meetings. At the same time, this funding should improve the capacity of beneficiary countries to build robust and compatible food control systems and to implement global food safety standards at their respective national levels. With respect to political and strategic activities related to the reported national use of the Codex Alimentarius, the report provides information on the outcome of participation in Codex meetings. It focuses on development trends and national implementation of food safety strategies. The report also provides suggestions for further international help to improve the use of Codex Trust Fund resources. The findings of the report are illustrated by comments and opinions provided by countries that answered the questionnaire.

On the basis of the answers received, it may be concluded that national progress in the area of food safety depends both on national policy and on the development status of the country. A variety of factors constitute the foundation of food safety, and several groups of interested parties are involved. Thus there are differences within countries in the rate of improvement at the political, administrative and legislative levels. Moreover, reported problems and difficulties with respect to the establishment of a functional food safety policy partly coincide or are the consequences of one another. Deficiencies are thus experienced at almost all stages of the food-chain.

Country responses indicate that political commitment to food safety is a prerequisite for coherent and efficient activities at the administrative or legislative levels. Four main factors were identified as having raised political awareness of the importance of food safety: incidents involving unsafe food on the international or the national market that represented a health and/or economic threat for the countries concerned, food safety issues resulting from the country’s participation in international food trade, or the effects of the work of international organizations. While food safety development depends on the economic status as well as the political commitment of the country, food safety activities may be enhanced by involvement in the work of Codex. Of the countries that responded, 42% considered poor coordination between responsible ministries as the main problem for their food safety system. In addition, operational administrative activities such as risk analysis and food control, as well as the implementation of the Codex Alimentarius, may still require an adequate legislative framework. As a consequence, further progress is likely to result from the elaboration of a national food law or the establishment of a coherent national food safety system. The assumption of responsibility for food safety also depends on all stakeholders being aware of its importance.

Despite the fact that the Codex Alimentarius is not exhaustive and cannot cover all food products of interest to Member nations as well as all areas of risk analysis, 67% of the countries that responded apply or use it as a baseline in national laws and for the development of national standards. The Codex Alimentarius and the activities of the Codex Alimentarius Commission have been helpful during the process of creation and modernization of food safety legislation. This has been especially the case since the Codex Alimentarius has been the reference for Member States in relation to their obligations under the Agreement on the Application of Sanitary and Phytosanitary
Measures (SPS) and the Agreement on Technical Barriers to Trade (TBT) of the World Trade Organization (WTO). Of the countries that responded, 31% have recently modernized their legislation (in the course of the past two years), while 54% have done so since 1995 (entry into force of the SPS Agreement with the establishment of WTO).

As a consequence, countries stressed the importance of active participation in international standard setting in the framework of the Codex Alimentarius Commission, in order to have a direct influence on its work and priorities. This also occurred in view of the risk for countries of being subjected to international standards against their national interests if they did not participate actively. Participation at Codex meetings supported by the Codex Trust Fund has been and will remain an important driving factor for food safety activities. The evaluation shows that countries have started to consider the enhancement of food safety as a prerequisite for economic development that can advance national food safety activities in all fields. Countries have also realized the importance of the health-related aspects of the work of the Codex Alimentarius Commission during national and international food safety crises affecting or threatening to affect national public health.

Food safety at all stages of the food-chain requires every stakeholder to assume the relevant responsibility. The food industry is involved or represented in the development of national food safety legislation in 44% of the countries that responded, and plays a role in the development of national food safety policy in 34%. In 37% of the countries that responded, consumers play a role as the final recipients of food products. In 17% of the countries, consumers are involved directly in the definition of national food safety policy. The analysis of questionnaire responses revealed that the involvement and impact of stakeholders seems to increase with the development status of the country and its food export/import activities. This is also due to the fact that the activities of small and medium enterprises, representing a majority of the industries in less economically developed countries, are often unable to fulfil the requirements of international standards. Meanwhile, all countries have realized the importance of an increased awareness of the responsibility of key stakeholders to work out an accepted national food safety policy. Thus many countries have initiated activities and training with the help of international organizations in order to create awareness of food safety and of the importance of following international standards.

In the context of increasing the impact of the activities of the Codex Alimentarius Commission, 27 countries mentioned the establishment of national Codex committees. These committees primarily help to coordinate the administration of various food safety activities, and also serve as national information and strategy platforms to raise awareness of Codex work.

In addition to enabling the participation of country representatives at Codex meetings, international help is requested by countries to support their activities related to food safety. This can be done through strengthening the activities of national Codex committees or through training workshops or consultancy on Codex matters for the responsible national officers and stakeholders. These may be specifically adapted to the country’s needs.

1. **Background and process of the evaluation**

The FAO/WHO Project and Trust Fund for Enhanced Participation in Codex (Codex Trust Fund) became operational in March 2004. It was launched in order to improve global public health and food security by promoting the provision of safer and more nutritious food and contributing to the reduction of foodborne diseases.\(^1\) It is closely linked to a proposal of the Codex Alimentarius Commission (CAC) to hold annual meetings of the CAC, its committees and task forces (Codex meetings) by establishing a fund to enable the participation of all Member States. The main

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\(^1\) For further information, see the Project document dated 17 June 2003 (available at [http://www.who.int/foodsafety/codex/en/proj_doc_e.pdf](http://www.who.int/foodsafety/codex/en/proj_doc_e.pdf)).
objective is to help low-income and lower-middle-income countries and those with economies in transition to increase their ability to participate, although upper-middle-income countries are also eligible for some support. A reinforced participation by developing countries in the establishment of international standards should facilitate collegial exchanges, knowledge transfer and professional development in the food safety area. This should ensure that appropriate experts in all countries of the world understand the current goals and objectives of the CAC, and can identify the country-specific data and information necessary to participate effectively in Codex activities. At the same time, this funding should improve the capacity of beneficiary countries to build robust and compatible food control systems and to implement global food safety standards at their respective national levels.

The CAC develops food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Programme in order to protect consumer health and ensure fair practices in the food trade. These standards do not protect consumers unless they are correctly implemented and enforced through a functioning food control system at national level (e.g. by comprehensive and up-to-date legislation, food monitoring and foodborne disease surveillance, licensing and inspection, political and institutional support and stability). The applicability of an international standard for use in domestic legislation depends on the ability of a country to enhance its administrative and/or legal system.

Following a recurrent request from countries benefiting from or donating to the Codex Trust Fund, this report aims to identify progress and difficulties in relation to national food safety activities in recent years. For this purpose it provides facts on the current status of progress, difficulties encountered and problem-solving strategies, illustrated by comments in the form of quotations gathered from a selection of countries that have participated in Codex meetings thanks to support from the Codex Trust Fund. The information was gathered on the basis of a written questionnaire completed by the Codex Contact Point of the countries concerned. The questionnaire was sent to 60 countries, and 46 countries provided answers (a response rate of 77%). The questionnaire aimed to provide reliable data on national activities in relation to or affected by the work of the CAC, especially at the political, administrative and legislative levels. It included the possibility for responding countries to make suggestions for the improvement of international help to enhance national progress in the implementation of food safety and thus to contribute more actively to Codex meetings. The report contains information on the outcome and benefits of participation in Codex meetings, as well as on ways of improving the use of Codex Trust Fund resources.

1.1 Purpose of the questionnaire

Considering that the work of the Codex Alimentarius Commission has been significantly influenced by high-income countries, the questionnaire aimed to identify potential health-related outcomes and benefits of participation in the activities of the CAC by countries supported by the Codex Trust Fund. The questionnaire focused on the direct functioning of the food safety system. Other areas related to further implications (such as implications for national and international trade) were not included in the survey, primarily because such questions would need to be addressed to different constituencies and would require other types of analysis. Within the constraints of this questionnaire, it was not possible to compare directly participating and non-participating countries. Such comparison would be possible only within a broader analysis framework considering production, trade and economic factors, as well as additional information on the development status of the countries involved.

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The questionnaire was sent to selected low- and lower-middle-income countries, since the Codex Trust Fund was established to help such countries to better participate in the meetings of the CAC in order to enhance their capacity to establish food safety and quality standards and fair practices in the food trade. The implementation of Codex standards is particularly challenging in these countries, especially in view of the costs related to the improvement of governance and manpower, as well as investments in public- and private-sector infrastructures. According to the strategic objectives and priorities of the CAC, Codex standard setting should also take into consideration the special needs of developing countries, including infrastructure, resources and technical and legal capabilities. Furthermore these countries might gain valuable insights into how to establish and enforce appropriate food standards from participating in the standard-setting process of the CAC and take adequate steps to take this process forward.

According to the analysis of 24 reports of beneficiary countries in the annual report for 2004 of the Codex Trust Fund, several beneficiary country delegates mentioned a “relative weakness of national food legislation and related institutions, constraints regarding available budgets and capacities, the lack of political awareness of the relevance of Codex standards in relation to international trade, and the limited capability to implement Codex standards”. The questionnaire aimed to provide reliable data on national activities in relation to or affected by the work of the CAC, especially in the form of political, administrative and legal commitment to enhance food safety. This could also help in identifying elements of food safety regulations that countries consider to be the most important to ensure a higher level of food safety. As an interim evaluation, the questionnaire aimed to ascertain how participation has had an impact on the implementation of Codex standards at the national level. This report therefore describes both positive developments as well as problems and difficulties encountered, and gives some national examples in order to improve the effective use of Codex Trust Fund resources.

1.2 Coverage and selection criteria

In a first round, the questionnaire was addressed to 18 countries and answered by 13 countries. It was then sent in a second round to another 42 countries and answered by 33 countries (see Annex 1). Countries received the questions in English, French and Spanish, as appropriate, and were generally given a two-month period to respond. Information concerning the questionnaire is given in Annex 2.

The countries evaluated were selected according to the following criteria: (1) the country was funded by the Codex Trust Fund in 2004 and/or 2005, and/or applied for 2006; (2) in accordance with the main objectives of the Codex Trust Fund, preference was given to least developed and low-income countries (Groups 1a and 1b), following an approximate representative share of beneficiary lower-middle- and upper-middle-income countries (Groups 2 and 3); (3) the selection approximately represents the worldwide proportion of Member and non-Member countries of WTO; (4) a representative share of beneficiary countries from the different Codex regions was sought.

7 For the grouping of eligible countries, see http://www.who.int/foodsafety/codex/country_en.pdf.
The final distribution of the answers received approximately reflects a representative share of these criteria (see Figs 1-4). All 46 responding countries were beneficiary countries of the Codex Trust Fund during 2004-2006 (65% in 2004; 72% in 2005; 73% in 2006; and 57% in all three years). The share of beneficiary countries according to their development status was: Group 1a, 28%; Group 1b, 15%; Group 2, 46%; and Group 3, 11%. Of the responding countries, 78% are WTO Member States. The Codex regions are represented as follows: Africa, 30%; Latin America and the Caribbean, 24%; Europe, 13%; Asia, 13%; Near East, 11%; South-West Pacific, 9%.

**Fig. 1** Proportion of respondents benefiting from the Codex Trust Fund, 2004-2006

**Fig. 2** Responding countries by development status
1.3 Evaluation method

The report follows the structure of the questionnaire. In order to avoid misrepresenting the information provided by respondents, the evaluation only considers those food safety activities that were specifically mentioned. If there was no response to a question, the country is simply not listed and is thus not included in the overall evaluation. Percentages were compiled relative to the total number of countries that provided answers to each specific question.

The examples quoted were selected to illustrate the findings of the report or to represent cases considered significant. Specific further information on national achievements in the area of food safety can be found in Annexes 3-5. A reasonably representative outline of national progress has been sought, taking into consideration that the answers to the questionnaire were provided under time pressure, and might in some cases only represent the opinion of the person completing the questionnaire. The main objective of the report is to identify development trends, by analysing the data gathered and national food safety strategies. The results presented here should be used with caution in a direct quantitative sense, because of the different levels of content in answers resulting from a free-text answer format.
2. Food safety in national policy

From the 44 answers received to this question, it became clear that countries found it difficult to define the content of a national food safety policy. In spite of this, 48% of the responding countries stated that a national policy, strategy or programme on food safety had been established (15 countries)\(^8\) or was in the process of being developed (6 countries),\(^9\) while 43% of the countries stated that they did not have a national policy on food safety as such (19 countries).\(^10\) However 30% of the countries described specific strategies, legal acts or other policies/parts of other policies that had been used to enhance or to implement food safety and control (13 countries),\(^11\) with another 21% having no political activities in food safety (9 countries, 6 from Group 1a and 3 from Group 2).\(^12\)

2.1 Triggers and strengthening factors

According to the countries that responded, four main factors could be identified that have raised political awareness of the importance of food safety: incidents of unsafe food on the international or on the national market representing health and/or economic threats for the countries concerned, food safety concerns resulting from the country’s participation in international food trade, or the effects of the work of international organizations (Fig. 5).

![Fig. 5 Main triggers for a food safety policy](image_url)

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\(^8\) Colombia, Costa Rica, El Salvador, Indonesia, Iran (Islamic Republic of), Kazakhstan, Lithuania, Mongolia, Morocco, Nicaragua, Niger, Nigeria, Philippines, Poland and Romania.

\(^9\) Albania, Dominican Republic, Lebanon, Papua New Guinea, Seychelles and Vanuatu.

\(^10\) Bhutan, Bolivia, Burundi, Cambodia, Cook Islands, Ecuador, Ethiopia, Georgia, Guinea-Bissau, Haiti, Lesotho, Mali, Paraguay, Rwanda, Samoa, Suriname, Swaziland, Uganda and Zimbabwe.

\(^11\) Cambodia, Bolivia, Ethiopia, Georgia, Guinea-Bissau, Paraguay, Peru, Samoa, Swaziland, Uganda, Tunisia, Zambia and Zimbabwe.

\(^12\) Bhutan, Burundi, Cook Islands, Ecuador, Haiti, Lesotho, Mali, Rwanda and Suriname.
Ten countries mentioned an international food safety crisis (such as BSE or avian influenza), or in some cases a foodborne disease outbreak at the national level. In general, widely publicized international food safety crises have increased the interest of the public, the media and politicians in food safety issues.

Furthermore, potential food safety threats resulting from national unhygienic practices and food-processing methods in 11 countries led to an appreciation of food safety and to the recognition that foodborne diseases may represent a significant public health problem. The decision to develop a national policy on food safety may also focus on the improvement of the safety status of food and agriculture production, to protect health and the environment or to enable an adequate reaction during a crisis. In addition, structural changes in the national administration dealing with food safety, such as the integration of primary agricultural production in the area of food safety control, may strengthen commitment to a national food safety policy.

A further driving factor has been the importance of the food trade. Activities in 10 countries were driven by the objective of improving the country’s competitiveness on the international market, as well as by concerns arising from unsafe or poor-quality food imports.

Seven countries reported that the involvement of international organizations (FAO and WHO) had contributed to an increase in the country’s political engagement in the field of food safety.

### 2.2 Problems and difficulties encountered

One country stated that there was no problem, while 32 countries (73% response rate) expressed concerns and mentioned difficulties regarding the establishment of a convincing and functional food safety policy, which partly overlapped. “With the lack of a national policy on food safety activities, there is no guiding document on the implementation of food safety/control programmes.”

One country stated that “the problems affecting the ensuring of food safety are simultaneously routed in the legislative framework, the administrative organization, the lack of coordination, the lack of facilities and resources and the insufficient political commitment. The deficiencies are perceived at almost all levels (production, control, quality assurance, information, certification, and distribution).” The lack of awareness in the food production sector of standardization/legislative activities concerning food safety, and the lack of skilled personnel in food safety, have led to “substandard food products from our industries and producers” that cannot be exported and can affect public health. These problems are mostly based on the absence of financial means “for the reason of political priority in other matters”. Fig. 6 provides a breakdown of the main reasons for difficulties encountered in developing a food safety policy.

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13 Cambodia (contamination of seafood in 1998); Indonesia, Jordan (contamination of hot pepper products with Sudan dyes); Nicaragua, Nigeria (cholera outbreaks in 1991); Papua New Guinea, Paraguay, Philippines (“The recent bird flu incidence which affected ASEAN countries except the Philippines cemented our strong resolve towards food safety.”); Vanuatu and Zimbabwe (national outbreaks concerning animal health).
14 Bolivia, Cambodia, Colombia, Dominican Republic, El Salvador, Kazakhstan, Nicaragua, Samoa, Syrian Arab Republic, Uganda and Vanuatu.
15 Colombia, Vanuatu.
16 Dominican Republic.
17 Cambodia, Colombia, Peru, Poland (accession to EU) and Uganda.
18 El Salvador, Mongolia, Niger, Philippines and Samoa.
19 Georgia, Guinea-Bissau, Lebanon, Nigeria, Paraguay, Romania and Zimbabwe.
Lack of infrastructure (control systems, laboratory facilities) and personnel

As the main problem, 14 countries\textsuperscript{20} (44\%) stated that they lacked an appropriate infrastructure to ensure food safety. They mentioned the non-existence of an established, functional and regular safety and quality control system (6 countries)\textsuperscript{21} and the need to improve the existing laboratories (5 countries).\textsuperscript{22} This included insufficient facilities for accreditation and verification mechanisms, monitoring and risk analysis (5 countries).\textsuperscript{23} Furthermore, 9 countries\textsuperscript{24} reported a lack of trained personnel in these areas.

Missing or outdated regulation (legislation, standardization) and enforcement (administration)

Twelve\textsuperscript{25} of the responding countries (38\%) identified the cause of problems in their food safety system as food safety legislation that is insufficient, outdated or dispersed in the laws, or inadequate standardization. “The lack of a food policy in the country is exacerbated by the absence or rather the delay in the enactment of the Foodstuff Act developed in 2001. With the lack of a national policy on food safety activities, there is no guiding document on the implementation of food safety/control programmes.” Even if food safety legislation exists, application is not ensured, which leads to difficulties in the enforcement of a harmonized and integrated control system and other food safety procedures, such as emergency response.\textsuperscript{26}

\textsuperscript{20} Burundi, Colombia, Costa Rica, El Salvador, Guinea-Bissau, Mali, Mongolia, Morocco, Paraguay, Peru, Rwanda, Samoa, Uganda and Viet Nam.

\textsuperscript{21} Burundi, Colombia, El Salvador, Morocco, Rwanda and Samoa.

\textsuperscript{22} Mongolia, Morocco, Peru, Rwanda and Uganda.

\textsuperscript{23} Colombia, Mali, Morocco, Rwanda and Samoa.

\textsuperscript{24} Burundi, Costa Rica, El Salvador, Paraguay, Peru, Rwanda, Samoa and Uganda.

\textsuperscript{25} Burundi, Costa Rica, El Salvador, Guinea-Bissau, Haiti, Mali, Mongolia, Morocco, Nicaragua, Peru, Rwanda, Swaziland and Uganda.

\textsuperscript{26} Morocco, Nicaragua.
Lack of commitment at the decision-making level

Eleven countries\(^\text{27}\) (34\%) found that delay in the development of a food safety policy arose from the fact that food safety had not been a priority issue at governmental level or was only beginning to be considered important. This is often the result of insufficient commitment and motivation at the decision-making level, or on the part of the responsible stakeholders, to improvement in this area. Another cause may be the fact that law-makers and officials involved “do not acknowledge the strong link between food safety and food security” or that “the national economic interest in food trade is still too little to raise the awareness of the importance of food safety by this way”.

Lack of coordination in administration

Despite the existence and responsibility of various institutions regarding food safety, 10 countries\(^\text{28}\) (31\%) stated that too little coordination among these institutions and overlapping responsibilities jeopardized a dynamic interaction to enforce a national food safety policy. Thus, the integration of such a policy into the legislation, the establishment of an effective control system or the planning of preventive strategies, short-term actions and emergency plans cannot be achieved.

Lack of education and information

Public awareness of the issue of food safety represents a decisive point for the enhancement of a food safety policy. The lack of education among those involved in food manipulation and officials working at food safety institutions, but also the lack of information for consumers, are an impediment to tackling the problem in 10 countries (31\%).\(^\text{29}\) This can further result in a lack of commitment of industries to adhere to regulations, and does not incite businesses to adopt good food safety practices such as certification and labelling.

Lack of financial resources

Only 6 countries\(^\text{30}\) (19\%) stated explicitly that the main cause of all the problems mentioned above was an insufficient national budget or the lack of other financial resources for a food safety policy and its implementation, for food safety activities including training and employment of personnel, scientific expertise and research, and for attendance at international meetings related to food safety.

2.3 National regulatory and structural strategies and international help

Depending on the financial and technical resources necessary for achieving the objectives, countries have undertaken the following actions (see also Annex 4).

Firstly, countries have pleaded for the establishment of a structured administration in order to accelerate the implementation of food safety activities. It was reported that a national food safety agency, a national Codex committee or any other intermediary national institution as such may demonstrate government commitment to food safety and help to raise public awareness of the issue. Furthermore, such a mechanism may facilitate the necessary coordination to set up or review food safety legislation or a food control system.\(^\text{31}\)

Secondly, national legislation may provide possibilities for the responsible agencies to create

\(^{27}\) Costa Rica, Ecuador, Guinea-Bissau, Lebanon, Lesotho, Mali, Papua New Guinea, Rwanda, Uganda, Viet Nam and Zimbabwe.

\(^{28}\) Bolivia, Cambodia, Colombia, Costa Rica, Dominican Republic, Ecuador, Guinea-Bissau, Haiti, Iran (Islamic Republic of) and Syrian Arab Republic.

\(^{29}\) Ecuador, El Salvador, Guinea-Bissau, Indonesia, Morocco, Nicaragua, Peru, Rwanda, Suriname and Viet Nam.

\(^{30}\) Cambodia, Jordan, Nigeria, Paraguay, Uganda and Viet Nam.

\(^{31}\) Costa Rica, Haiti, Nigeria, Poland and Syrian Arab Republic.
technical committees and working groups cutting across all concerned sectors for the purposes of national coordination and communication on matters of food control.\textsuperscript{32}

Thirdly, countries have tackled the improvement of their national food control system or the development of relevant national standards as a basis for the protection of public health and in order to comply with the requirements of the international market.\textsuperscript{33}

In order to increase commitment to a food safety policy in the health, agricultural, production and normative sectors that should be aware of the importance of food safety, countries have engaged key stakeholders at different levels and held seminars and workshops in order to start a national dialogue on food safety and control.\textsuperscript{34} It was confirmed that Codex activities (specific training and the Codex Trust Fund to attend Codex meetings) have been useful to address some food safety areas.\textsuperscript{35} One country has raised awareness for food safety through certification and education of small and medium enterprises, education of food inspectors and good agricultural practices for farmers.\textsuperscript{36}

Countries suggested that the international organizations should help to raise political commitment to food safety by interacting with the political leadership to raise awareness and emphasize the importance of food safety at the highest level. “The World Health Assembly is a forum for political and policy-makers and FAO/WHO should utilize this opportunity to sensitize the political wing on issues of food safety.”\textsuperscript{37} International organizations might conduct external audits that guide countries towards adequate policies for the improvement of food safety or provide courses as well as seminars on a frequent basis or as follow-up projects for food safety policy-makers.

3. Food safety in the national administration

This question was intended to ascertain whether countries have put in place an administrative system to monitor food safety measures by food business operators, to ensure the detection of food safety threats and to enforce administrative measures to prevent foodborne diseases and to avert food safety crises. As specific examples for administrative action, the questionnaire sought more information on the country’s progress in undertaking risk analysis, in food control within the different sectors of the food production system, and in emergency response.

3.1 General observations

Generally, several ministries participate in the administration of food safety in all 46 responding countries (100% response rate). These are mainly the governmental areas of health (80%), agriculture (74%), and industry and commerce (24%). Other departmental areas may have responsibilities for food safety depending on the specific national administrative system as well as the specific national food safety interests. In many cases, the customs authorities for example are in charge to ensure safety of all food available/consumed in the country. For example: Bolivia (approved a Supreme Decree (2005) to create a mandatory Unique National Health Registry for Food and Beverages to guarantee the safe marketing of foodstuffs); Zimbabwe “through projects such as: Strengthening food legislation in Zimbabwe, FAO project 1985, which led to updating food legislation, creating the Food Standards Advisory Board; Strengthening food safety control in Zimbabwe, FAO project 1997, resulted in the Food Safety Control Bill being processed for enactment soon. This will create the Food Safety Control Authority which will be in charge to ensure safety of all food available/consumed in Zimbabwe”.

For example: Lebanon established a National Food Safety Panel four years ago that assesses the various food sectors in the country and generates the respective GMP and HACCP guidelines. The Philippines “are strongly advocating prevention of aflatoxin contamination in the country and also put in place Good Agricultural Practices (GAP) and Organic Agriculture as food safety measures”.

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\textsuperscript{34} Dominican Republic, Lesotho.
\textsuperscript{35} Papua New Guinea.
\textsuperscript{36} Indonesia.
\textsuperscript{37} Zambia.
charge of food import/export.

In 24 of the responding countries (52%), there is a specialized department or agency, or several, responsible for food safety\textsuperscript{38} or for specific issues of food safety,\textsuperscript{39} e.g. standardization and technology, quality, inspection and certification, products of a certain origin. Furthermore other public institutions and associations may be involved in issues concerning food safety, e.g. trade or consumer associations, research institutes.

As far as specific administrative food safety actions are concerned, 6 respondents stated that neither a system for risk analysis, nor for food control, nor for emergency response existed in their country. At the same time, these countries mentioned having no national food safety policy and inadequate prioritization as the causes of slow progress in this area. These findings are illustrated in Figs 7-11.

**Fig. 7 Distribution of government departments involved in food safety administration by income groups**

\textsuperscript{38} Albania, Bhutan, Bolivia, Colombia, Costa Rica, Dominican Republic, Kazakhstan, Lithuania, Mali, Mongolia, Nicaragua, Nigeria, Paraguay, Philippines, Papua New Guinea, Poland, Romania, Vanuatu and Viet Nam.

\textsuperscript{39} Burundi, Iran (Islamic Republic of), Jordan, Papua New Guinea, Seychelles, Syrian Arab Republic and Viet Nam.
Fig. 8  Distribution of government departments involved in food safety administration by Codex regions

Fig. 9  Distribution of government departments involved in administrative food safety activities
3.2 Problems and difficulties encountered
There were 39 answers concerning problems and difficulties encountered in national food safety administration. Of these, two countries (both Member States of the European Union) stated that they did not experience any problem in this area. Thus the following points reflect a response rate of 80%. The issues are illustrated in Figs 12-14.
Fig. 12  Proportion of responding countries referring to specific problems with food safety administration

Fig. 13  Distribution of problems with food safety administration by Codex regions
Fig. 14 Distribution of problems with food safety administration by income groups

Lack of coordination

As the main problem for food safety in the national administration, respondents noted that their administration was experiencing difficulties because of poor coordination, collaboration and communication among the various responsible ministries, departments, and agencies (23 countries, 62%). They also reported that responsibilities occasionally overlapped. “Various ministries respond to food safety issues without reference to other agencies’ definitive roles.” “Even though special commissions and interministerial agencies may be established to assure food control, there is no national strategy for control based on risk assessment.” “Food safety control is fragmented, at municipal level a national coordination is missing.” “A multiplicity of bureaucratic processes does not add value to food safety, but involves significant costs for the private sector and the government.”

Lack of infrastructure and personnel

The second problem encountered and mentioned by 21 countries (57%) when setting up an administrative system to enhance and enforce food safety is the lack of an adequate infrastructure, including equipment and laboratories (20 countries). Furthermore there is no trained and qualified personnel and expertise in the control agencies nor in the laboratories (10 countries). This renders the organization of an effective food control system and scientific risk assessment impossible. This may all be caused by problems such as “to define sentinel sites for implementing a laboratory-based surveillance system the lack of infrastructure such as potable water and adequate refrigeration, lack of awareness about food safety and hygiene, lack of technical and financial resources for an effective institutional framework”.

Lack of legislation, standards and procedures

Coordination and collaboration between the different ministries and agencies seems to be lacking or

40 Bolivia, Cambodia, Colombia, Costa Rica, Dominican Republic, Ethiopia, Georgia, Guinea-Bissau, Haiti, Iran (Islamic Republic of), Jordan, Lebanon, Lesotho, Morocco, Nicaragua, Nigeria, Rwanda, Syrian Arab Republic, Uganda, Vanuatu, Viet Nam, Zambia and Zimbabwe.
41 Bhutan, Burundi, Colombia, Ecuador, El Salvador, Guinea-Bissau, Haiti, Indonesia, Iran (Islamic Republic of), Lesotho, Mongolia, Morocco, Nigeria, Paraguay, Philippines, Romania, Seychelles, Swaziland, Vanuatu and Zimbabwe.
42 Burundi, Indonesia, Mongolia, Paraguay, Philippines, Romania, Seychelles, Swaziland, Syrian Arab Republic and Vanuatu.
at least to be problematic when regulations concerning the range of responsibilities of each institution are inadequate. The same applies to the implementation of risk analysis, food control and emergency response. If the administration does not provide an authoritative framework, concerned stakeholders also encounter problems applying and enforcing food safety measures. There is “no prevention, but only an emergency strategy”. Thus several countries consider that lacking or insufficient food safety legislation, standards and operational procedures, or, if they exist, a lack of enforcement, are the main problems in their national food safety administration (9 countries, 24%).

Lack of financial resources

Ten countries (27%) deplore a lack of financial resources, “a limited budget from the government” or “the lack of or weak national capacity”.

Lack of commitment at political and stakeholder levels

Furthermore, 8 countries (22%) refer to missing commitment at the political level (4 countries) as well as among the various stakeholders responsible for food safety (5 countries).

3.3 National regulatory and structural strategies and international help

The following country statement may serve as an example of a national strategy to tackle the problems mentioned above (see also Annex 4). The food safety administration of this country consists of a ministerial department and an implementing wing. “The Ministry has an institutional framework from national to district level. The implementing organ mainly does risk analysis. Where capacities are lacking the ministerial department comes to assist. FAO/WHO also assist where it requires external consultants. The establishment of a Technical Committee on Food Safety tries to address coordination and funding problems. Environmental Health is a funded programme and has been used as an example to fund other food safety programmes.”

Thus it can be noted that a functional food safety administration and an effective food control system presuppose existing coordination between the ministries, standard-setting organizations and enforcing entities at all levels “through national food safety networking”. This has enabled countries to define a national policy with food safety objectives (e.g. “to harmonize the emission of certificates, the reinforcement of laboratories and infrastructural capacities, the sensitization and information of the society of the importance of food safety for the private sector”, “use a one window principle to facilitate import and export procedures”) and to set up food safety legislation. These processes have been facilitated by guidance and help from international organizations as well as bilateral and multilateral cooperation.

In order to improve national food safety administration, countries propose extending international help in the following areas: training of food inspectors, laboratory personnel and the responsible entities; public education and awareness activities; the establishment and improvement of laboratory equipment and infrastructure facilities; the implementation and finalization of legislation; the establishment or reinforcement of the responsible national administrative institutions or Codex offices. Countries acknowledge the leading responsibility of the international organizations in providing sound scientific assessments of hazards and risks in food as a basis for managing risk at

43 Burundi, Colombia, Ecuador, Morocco, Nicaragua, Papua New Guinea, Rwanda, Samoa and Uganda.
44 Bhutan, El Salvador, Indonesia, Iran (Islamic Republic of), Mongolia, Paraguay, Romania, Uganda, Vanuatu and Zambia.
45 Burundi, Samoa, Uganda and Vanuatu.
46 Colombia, Guinea-Bissau, Morocco, Swaziland and Uganda.
47 Zambia.
national level. There is an apparent need to strengthen these international activities including food safety risk assessment and risk communication, to improve efficiency and effectiveness in providing expert scientific advice to the Codex Alimentarius Commission and thus to Member nations.

3.4 Risk analysis

In all, 37 countries responded to the question related to risk analysis (59% response rate). Of these, 27 countries\(^{48}\) (73%) reported on some level of competency in risk analysis within the ministries responsible for food safety administration. This number includes those countries that are in the process of integrating risk analysis into their food control systems, or that carry out risk analysis only at specific stages of the food-chain. Ten countries (27%) do not yet undertake risk analysis at any stage.

In most countries, risk analysis is placed under the responsibility of a ministry and/or a special national service in the departments of agriculture (60%), health (46%) or trade (16%). However, those who responded to this question did not give a great deal of information on how risk analysis is conducted and whether it complies with international standards. Only two countries referred to risk analysis being composed of risk assessment, risk management and risk communication. Others mentioned for example that they were undertaking risk analysis only of fresh products or imported food, mostly at local or provincial level, not at national level, or only some qualitative risk analysis with regard to animal diseases that “may not necessarily be of food safety concern”. “At the moment full quantitative risk assessments are not carried out, the country relies on international assessment (WHO, Codex, etc.)”. “There is still a lack of necessary training in the area of risk analysis.” This means that even if a country has adopted risk analysis based on Codex, its practical application may not be functioning.

The first prerequisite for risk analysis is the existence of one or several responsible institutions that work independently and on a scientific basis. Thus insufficient institutional capacity as well as the lack of trained and professional personnel are recorded by several countries as being the main reasons for difficulties in this area.\(^{49}\) A lack of specific laboratory facilities in the responsible entities to conduct risk analysis can even “lead to a dependency on other laboratories for food analysis purposes and their accreditation status”. “There is a general lack of capacity and expertise in the food analysis area. For instance, documentation is more or less non-existent in some areas including chemical parameters [such] as residues of pesticides in food and contamination with heavy metals.” “Lack of laboratory resources in the national chemical laboratories and lack of trained technicians has hampered the monitoring of pesticide residues, food additives and contaminants in foods. Various attempts for international support have not been successful.” Since new food production and growing methods have been applied, traditional approaches to tackle food safety problems have proved largely unsuccessful. “We need now more data on food intake and on the concentration of contaminants in food, in order to permit assessment and management of these risks, including setting of national and international standards.” One country stated that it “misses an expert who could evaluate and analyse data in a scientific manner”. This problem is mainly the result of insufficient financial resources.

Risk analysis is not effective if the responsible entities do not collaborate. This is the case if several responsible entities each undertake “their own analysis of food for risk assessment and don’t share the data”. Low participation of interested parties in the preparation of national standardization can

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\(^{48}\) Bolivia, Burundi, Cambodia, Colombia, Costa Rica, Dominican Republic, El Salvador, Guinea-Bissau, Iran (Islamic Republic of), Jordan, Lesotho, Lithuania, Mali, Mongolia, Nicaragua, Nigeria, Papua New Guinea, Paraguay, Peru, Philippines, Poland, Romania, Rwanda, Seychelles, Syrian Arab Republic, Tunisia and Viet Nam.

\(^{49}\) Colombia, Ecuador, Haiti, Mali, Mongolia, Morocco, Seychelles, Swaziland and Uganda.
also hamper its implementation.

3.5 Food control related to various sectors of the food production system

In all 43 countries responded to this question (80% response rate). Of these, 37 countries\(^{50}\) (86%) reported that they provide for food control throughout the food production chain. In 63% of these countries the ministry of agriculture, in 37% the ministry of health and/or in 16% the ministry of trade are responsible for food control. Sometimes the national food safety agencies or other national organizations, trade associations and also private-sector institutions are involved.\(^{51}\) Only 6 countries (14%) stated explicitly that their country did not yet carry out food control.

Even if many countries reported that food control was being undertaken, little information was given on its type, organization and coverage. On the assumption that countries that reported several control steps/control entities along the food-chain provide for “food control on the different sectors of the food production”, 20 countries (47%) are in this category, while only 4 (9%) refer explicitly to the application of HACCP. Based on the following explanations of some respondents, a general picture seems to emerge that in many countries food control activities are fragmented and do not cover the entire food-chain from farm to consumer.

“Since the outbreak of the Mad Cow Disease, by ministerial order the Quarantine Department has to inspect and monitor processed meat coming from the EU countries. As for the safety control of the food production, there is no proper monitoring. The health inspectors normally act upon a complaint before the Public Health Department.” “Although there are standards in this regard, the control of the food safety is voluntary and is not completely supervised by the responsible institutions.” “The traditional inspection of food premises alone tends to place the food safety responsibility on the food control authority whereas food businesses and consumers also have a responsibility for food safety. There is a need to recognize the food control triangle which includes the consumers, food businesses and the food control authority. The introduction of a food safety management programme which uses HACCP at all stages of the food-chain would address this problem.” “The structure of the food safety system needs tightening/strengthening to be able to nip in the bud all threats and outbreak crises.”

A food control system requires the identification of the different control steps and the assignment of respective responsibility, equipment and pertinent action in accordance with control results. Its creation depends on technical and financial resources, as well as on the time and effort of officials and business operators. Consequently, national problem-solving strategies for food control on the various sectors of the food production system differ from country to country. With several responsible ministries, departments and other institutions, the need for coordination and communication is evident in most, if not all countries.

Improvement in the national food control system has resulted from the realization of its positive effects, i.e. the protection of public health and access to the international market. Moreover, the inspection of food hygiene in restaurants has been considered to be “important to ensure tourism service of high standards”. Because of the dependency on a neighbouring state, “food safety issues have not been given attention on the assumption that the neighbouring state’s system will suffice. Recent developments have shown that this is not the case, hence the desire to enact modern legislation that will create a more effective food control system.” It has also become apparent that

\(^{50}\) Albania, Bhutan, Bolivia, Burundi, Cambodia, Colombia, Costa Rica, Ecuador, El Salvador, Georgia, Guinea-Bissau, Haiti, Iran (Islamic Republic of), Jordan, Kazakhstan, Lebanon, Lesotho, Lithuania, Mali, Morocco, Nicaragua, Nigeria, Papua New Guinea, Paraguay, Peru, Philippines, Poland, Romania, Rwanda, Seychelles, Suriname, Swaziland, Syrian Arab Republic, Tunisia, Viet Nam, Zambia and Zimbabwe.

\(^{51}\) Albania, Bolivia, Bhutan, Lithuania, Nicaragua, Mongolia and Nigeria.
the food control process depends on an integrated organization in order to allow prevention of hazards and emergency response at all levels. One country wants to focus its new food law “on a farm-to-table approach as an effective means of reducing foodborne hazards.” Another country states: “Prevention is lacking, as the control of the different steps in the food-chain is not functioning”.

3.6 Response system for emergencies

In all 35 countries responded to this question (76% response rate). Of these, 26 countries (74%) reported that there were responsible and competent authorities for emergencies in their administration. These are primarily located in the ministries of agriculture (51%), health (40%) and trade (6%), in their role as leading entities responsible for food safety issues in general. The ministries should respond to emergencies that are within the purview of their mandate. In some cases, countries have mandated specialized agencies for emergency response or the institutions in charge of food control are also responsible for emergency measures in their control areas.

Nevertheless, 9 responding countries (26%) stated that a reliable and structured response system is not, not yet or only poorly functioning. “Mechanisms exist that facilitate to act in contrast to emergencies but a structured system in the area of food that includes legal, financial and operational aspects does not exist.” Several countries referred to the importance of the International Food Safety Authorities Network (INFOSAN) or found the help of international organizations indispensable in case of a food crisis.

A number of countries reported that the response to emergencies was haphazard and not well coordinated. This concerns the coordination of emergency response activities as well as information sharing and reporting, especially if several institutions are involved. Countries are thus facing difficulties in determining the adequate and approved strategy to be applied in an emergency case. An uncoordinated fragmented approach “and the lack of information sharing leads to duplication, wasted effort and wasted resources without achieving a satisfactory outcome.” “A disease outbreak might be reported at the hospitals, but the responsible products are not traceable.” “Due to difficulties in the reporting system not all cases of food related diseases or maladies are reported.” “The practice of withdrawal of contaminated products from the market is not frequent.” “Specific standardization with regard to emergency measures is lacking.”

These problems were reported to be due to the lack of a food safety policy or a national budget in order to deal with emergencies adequately. “The development of an environmental health information management system was initiated with the help of consultants from WHO. This document has a component of food safety. However, completion of this exercise is still pending and as such a reliable response system for food control emergencies is currently not in place. An efficient environmental health information system would inevitably require a hardware component, universally accepted computer software, a reliable Intranet and Internet (for networking purposes), trained data encoders (professional environmental health staff) and capable database maintenance personnel.”

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52 Bolivia, Cambodia, Colombia, Costa Rica, El Salvador, Haiti, Iran (Islamic Republic of), Lithuania, Mali, Nicaragua, Philippines, Papua New Guinea, Poland, Paraguay, Peru, Romania, Seychelles, Suriname, Vanuatu, Viet Nam, Zambia and Zimbabwe.
53 For example: Costa Rica, El Salvador, Guinea-Bissau and Paraguay.
54 Nicaragua, Papua New Guinea and Vanuatu.
55 Poland, Suriname.
4. Food safety legislation

Countries may opt for the application of food safety legislation as a clear and transparent way of enforcing food safety at the national level. A food law ensures the protection of human health and of the interests of consumers in relation to food, taking into account the diversity of the food supply. This includes, according to the principle “from farm to fork”, agricultural products and animals including seafood and fish intended for the food production chain, as well as the subsequent elements of this chain. A food safety agency may also be established as a specialized administrative institution, or provide administrative authority to other executing agencies. For the purpose of this report, “food law” will be considered as the general legal act or framework governing food safety and food control.

Food safety legislation may be subdivided into “horizontal” and “vertical” regulations. Generally vertical legislation on food includes regulations for a single product or a product group. Horizontal legislation concerns food and food production with regard for example to the installation of a control system such as HACCP, to the distribution of responsibility for food hygiene, labelling or advertising, or to the use of supplements, additives, contaminants, residues, contact materials or irradiation. Other issues regulated in laws and/or regulations relevant to food are for example animal health, fisheries/aquaculture, animal feeds, licensing of food production establishments, and import/export of food.

Countries whose legislation is not very elaborate often defer to regulation based on standardization. Such regulation may exist in combination with or fully replace horizontal food safety legislation. In countries with fully standards-based regulation, a single food product may be covered by a mandatory standard and its production, storage or distribution is thus only authorized upon compliance with the defined standard.

In general it is very difficult to compare the legal systems of different countries. In democracies the parliament initiates and adopts national legislation, which can provide executive authorities with the power to make more specific rules and regulations. Other instruments that may represent a legal baseline are standards that may also be developed by nongovernmental institutions. The hierarchy of the various legal acts also differs. For the purpose of this evaluation, all national measures that can be enforced or serve as a legal baseline are considered to be food safety legislation.

4.1 General observations

All 46 countries gave answers under this question (100% response rate). In general, countries considered the existence of a food law as a necessary basis to ensure food safety (for examples of food safety legislation, see Annex 4). “Until recently, the legal system for regulating food safety was based on legal definitions of unsafe food, enforcement programmes for the removal of unsafe food from the market and sanctions for the responsible parties. The country does not have a food law. But, due to the changes in eating patterns, changes in farm practices, more extensive food distribution systems and the increasing preference for meat and poultry all suggest the need of a food law.”

Thirty countries (65%) reported the existence of a food law, while 9 countries (20%) stated that there was no food law in their country. Most frequently, countries have several laws addressing different aspects of food safety or different sectors of food production, as was the case in 32 of the

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57 Cook Islands, El Salvador, Georgia, Iran (Islamic Republic of), Jordan (Food Law No. 79/2001); Kazakhstan (National Law of 8 April 2004 No. 543-II on quality and safety of foodstuff); Lithuania (Law on Food of 2000); Mongolia (Food Law approved in 1995 and revised in 1999); Vanuatu, Viet Nam (Food Act of 2003); Zimbabwe (Food and Food Standards Act, enacted in 1971, updated in 1996).
responding countries (70%). Food safety activities are thus regulated within a legal framework that may cover either comprehensively or partially all food safety aspects, including for example consumer protection, agriculture (areas of animal and plant health and agricultural production methods) or fisheries. Furthermore, legislation is included in the form of regulations concerning even more specific areas such as transport, storage, sampling plans, licensing, etc.

Only 26 of the 32 countries with existing food safety legislation gave information on the years of application of the various laws. Eight countries (31%) confirmed that they had recently (in the course of the past two years) modernized their legislation, while 14 countries (54%) had done so since 1995 (entry into force of the SPS Agreement). Ten countries (39%) are in the process of updating the existing legislation and 4 countries (15%) are planning to do so. In 3 countries (12%), recent updating processes have failed.

Eight of the responding countries do not have applicable national food safety legislation to date. However, one of these countries qualified the statement. The country has standards that “are outdated and inconsistent with the international standards”, so that only 7 countries (15%) reported having absolutely no legislation in this area.

In most countries, the ministries responsible for the respective area or the competent authorities are empowered to make rules and regulations, to enforce them and to monitor compliance at national level. Concerning the district level, competent authorities should align their regulations according to the national legal limits. A few countries reported that their municipalities also had certain powers for municipal ordinances/by-laws regarding municipal matters and within the municipal jurisdiction. “This includes the responsibility for essential services (e.g. health and food inspection at district level) in order to ensure the implementation of national policies and adherence to compulsory standards.”

4.2 Problems and difficulties encountered

In all, 32 countries responded to this sub question, of which 3 countries (two European Member States and one seeking future adhesion to the EU) reported that their law is in compliance with European law and that thus no problem exists (63% response rate). See also Fig. 15.
Lack of a functioning food safety administration

The problem of non-existence of adequate food safety legislation is mostly seen as a result of a poorly functioning administration (59%, 17 countries): 8 countries\textsuperscript{68} deplored the lack of administrative coordination; 11 countries\textsuperscript{69} mentioned the need for institutional strengthening for the preparation, review and updating of legislation through more competent and trained personnel and the employment of sufficient staff. “There has to be the national capability to draft new modern legislation.” When undertaking the necessary updating processes, countries have noted “missing adequate guidance and code of practices of food laws”, “the deficiency of reliable data on the burden of foodborne diseases”, and inadequate financial resources “to implement these planned activities” or for “food safety personnel to participate in the regional and international meetings/workshops on food safety”.

Lack of financial resources

Many of these problems may be the result of insufficient financial resources (21%, 6 countries).\textsuperscript{70}

Lack of political commitment

The ability to set up, finalize and approve a drafted food law, as well as the review and modernization of existing laws is difficult without the political commitment of law-makers to the issue of food safety (24%, 7 countries).\textsuperscript{71}

\textsuperscript{68} Cambodia, Colombia, Ecuador, Guinea-Bissau, Morocco, Paraguay, Viet Nam and Zimbabwe.
\textsuperscript{69} Dominican Republic, El Salvador, Iran (Islamic Republic of), Mali, Mongolia, Morocco, Nicaragua, Papua New Guinea, Paraguay, Philippines and Zambia.
\textsuperscript{70} Cambodia, El Salvador, Iran (Islamic Republic of), Mali, Paraguay and Vanuatu.
\textsuperscript{71} Colombia, Haiti, Lesotho, Suriname, Swaziland, Uganda and Vanuatu.
Lack of adequate application

In cases where food safety legislation exists, problems and difficulties have arisen during its application (62%, 18 countries), because the laws are obsolete (9 countries), too various and scattered (3 countries), not covering all relevant areas or those becoming important (new technologies) (2 countries) or contradictory (3 countries). Six of the responding countries mentioned the lack of a food law as a general problem in this area. “Legislation consists of either very outdated laws or incomplete texts that have been adopted in response to specific problems.” Countries seem to prefer a general food law to several food laws. “The principal problem that we have is the lack of a “food law” that defines the general guidelines.” “There exists such a broad quantity of laws, decrees and regulations that the law is little known in its entirety, its application is difficult for the public and the private sector and a complete analysis of the regulation is difficult.” As far as standardization processes are concerned, a “lack of production of specific technical standards and in some cases the overlapping of standards between sectors” has been encountered. The application can be hampered because of “limited dissemination of technical regulations and missing information systems” and because of deficiencies in the food control and inspection system, e.g. “no national food control system”.

Lack of enforcement

The impact of food safety legislation may be jeopardized if countries have difficulties in enforcing the application of their legislation (24%, 7 countries). The deficiency of law enforcement is mostly based on a lack of inter-institutional coordination or overlapping competencies, which again is the result of insufficient legislation. “A duplication of regulatory activities in some areas of food control and consequently all concerned ministries are rivals without good cooperation.” It may also be caused by a “problem of acceptance of new legislation by the private sector, if the infrastructure to implement the legislation is not existing”. “New legal provisions were implemented requesting to change the labels. No major difficulties were encountered, except additional costs to be supported by operators.”

4.3 National regulatory and structural strategies and international help

Despite these positive facts concerning the existence of food safety legislation in countries, and drawing conclusions from the problems mentioned, one may assume that the status of food safety legislation in the countries evaluated is still insufficient to enhance food safety at all levels of production. This assumption is based on information provided by countries on the content of the laws, the date of issuance as well as the necessary modernization procedures.

National strategies to overcome these shortcomings vary depending on political will and development status (for details, see Annex 4). As legislation requires special knowledge, countries explicitly requested technical support from the international organizations. The latter should “make available copies of similar legislation or a template that may be of use to develop an initial draft”, provide “support in the contracting of consultants specialized in the subject for the development of standards”, “provide information related to international legislation”, distribute “the latest

72 Albania, Bolivia, Cambodia, Colombia, Costa Rica, Ecuador, Indonesia, Iran (Islamic Republic of), Lesotho, Paraguay, Rwanda, Samoa, Seychelles, Swaziland, Syrian Arab Republic, Tunisia, Uganda and Vanuatu.
73 Albania, Colombia, Ecuador, Iran (Islamic Republic of), Lesotho, Rwanda, Samoa, Seychelles and Uganda.
74 Costa Rica, Ecuador and Paraguay.
75 Cambodia, Vanuatu.
76 Costa Rica, Guinea-Bissau.
77 Bolivia, Samoa, Swaziland, Syrian Arab Republic, Tunisia and Uganda.
78 Cambodia, Dominican Republic, Guinea-Bissau, Indonesia, Vanuatu, Viet Nam and Zambia.
79 For example: El Salvador (National Health Code with chapters related to food safety including water); Morocco (1984; 1977); Vanuatu (Food Control Act of 1993 which will be reviewed next year).
developments on legislation, so that the possibility exists that these regulations can be implemented in the national law”.

Modernization is often based on EU law in European countries, the FAO/WHO model food law and the WTO Agreements. “National legislation since 1st of May 2004 has been fully harmonized with the EC. So, we appreciate that there are no major problems regarding EU legislation transposition.” Modernization of a law may require a plan for system improvement and capacity-building, inter-institutional coordination, and participation of the productive sectors and academia in the processes of regulation. The problem of scattered and insufficient legislation may justify the elaboration of a “food law” that “defines the general guidelines” and “brings together the national legislation”. Law enforcement problems could be solved if “a better coordination between business operators and consumer information incited the business operators to implement labelling and certification”.

For the improvement of national food safety legislation, countries requested technical support for setting up, analysing and reviewing food safety legislation and national food standards, as well as for the enforcement of food safety legislation.

5. Use of the Codex Alimentarius

None of the 45 responding countries (98% response rate) reported that the Codex Alimentarius was not useful and did not play a role in their food safety activities. Respondents referred to Codex standards, Codex principles or the Codex Alimentarius in general, but did not really differentiate between the instruments (for further information, see Annex 3).

5.1 General observations

In 30 countries (67%), the Codex Alimentarius is either applied and/or used as a baseline for national laws, executive regulations or standards. Less frequently, the Codex Alimentarius is used as a direct reference for the development of national standards/regulations (4%). In some cases where countries have used the Codex Alimentarius, they have selected only relevant areas.

Codex Alimentarius standards are often adopted and declared as national standards when national standards in the respective areas are not available. This is especially the case in countries without applicable food safety legislation, where the Codex Alimentarius standards have been used to establish national standards (22%). Of the countries that responded, 18% hope to integrate the standards and principles of the Codex Alimentarius into pending or drafted national food safety legislation or national standards in the future.

Codex Alimentarius standards have served as a reference for national food control authorities.

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80 Albania, Poland, Romania, Tunisia and Uganda.
81 Poland, Romania.
82 Cambodia.
83 Colombia.
84 Colombia.
85 Bolivia.
86 Colombia.
87 Morocco.
88 Bolivia, Burundi, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Guinea-Bissau, Haiti, Indonesia, Iran (Islamic Republic of), Jordan, Kazakhstan, Lebanon, Lesotho, Lithuania, Mali, Morocco, Nigeria, Paraguay, Peru, Philippines, Papua New Guinea, Poland, Suriname, Tunisia, Uganda, Viet Nam, Zambia and Zimbabwe.
89 Bhutan, Burundi, Cook Islands, Costa Rica, Nigeria, Peru, Samoa, Seychelles, Swaziland and Syrian Arab Republic.
90 Bhutan, Cambodia, Cook Islands, Georgia, Lesotho, Mongolia, Samoa and Vanuatu.
91 Haiti.
With regard to the modernization of existing food laws, the *Codex Alimentarius* may justify the regulation of new areas related to food safety.\(^92\)

Many countries reported under this question on the process of establishment of their national Codex committees. National Codex committees have been established in 27 countries. As these committees are often composed of representatives from ministries, national services/agencies/standardization bodies, universities or other research institutions as well as from the existing organization of other stakeholders working in the area of food safety and consumer protection, they serve the purpose of a coordinating institution. They may coordinate “all national structures involved in food safety in order to advise the government in the case of problems in standardization processes and food safety issues addressed in the *Codex Alimentarius*”,\(^93\) be “in charge of doing a periodic review of the sanitary standardization with regard to food safety, with the purpose of proposing its harmonization with the international standardization applicable to the matter”,\(^94\) or represent “an effective mechanism for considering the government’s national food control requirements in relation to the work of the Codex Alimentarius Commission food standards programme”.\(^95\) A national Codex committee may even help “to raise the national interest among all stakeholders for food safety”.\(^96\)

The tasks undertaken by the committees differ depending on the status and development of the committee in the various countries. “At the initial stage, since 2004 the Codex team has worked on the translation of Codex standards into the national language and the distribution of Codex committee related materials and documents to respective bodies. In the future, the team will be working to bring national standards in conformity with international standards.”\(^97\)

### 5.2 Problems and difficulties encountered

#### 5.2.1 Implementation of the Codex Alimentarius

On the basis of the number of answers, it may be concluded that a limited capacity to generate the information flow needed to create public awareness of the importance of the *Codex Alimentarius*, especially for the actors in the food-chain, represents the main problem with regard to the implementation of the *Codex Alimentarius* in 12 countries\(^98\) (27%, of which: Latin America and the Caribbean, 50%; Africa, 17%; Asia, 8%; Europe, 17%; South-West Pacific, 8%; and Group 1a, 17%; Group 1b, 17%; Group 2, 67%). “People have their own customs, especially those who are practising agriculture. For them it will take time to make them understand the rules that have to be adhered to in food safety. For example the use (maximum levels) of pesticide residues.”\(^99\) Countries repeatedly mentioned a lack of timely distribution or publication of the versions of the *Codex Alimentarius* standards and other documents in the official languages of Codex. Others have faced language and translation problems.\(^100\)

This problem is closely linked to a reported weak commitment of administrative and political entities to food safety (3 countries, 7%). “Even though the country has been a member of the CAC

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92 Colombia.  
93 Morocco.  
94 Peru.  
95 Uganda.  
96 Iran (Islamic Republic of).  
97 Mongolia.  
98 Bolivia, Colombia, Ecuador, Georgia, Guinea-Bissau, Haiti, Kazakhstan, Mongolia, Peru, Papua New Guinea, Suriname and Viet Nam.  
99 Suriname.  
100 Georgia, Kazakhstan, Mongolia and Viet Nam.
since 1997 and of WTO since 2000, its activities with regard to the *Codex Alimentarius* only started in 2003. This was due to the lack of a political will and information.” Together with this, 9 countries\(^{101}\) (20%) mentioned as difficulties a fragmented approach to the implementation of *Codex Alimentarius* activities, as well as a lack of monitoring of its implementation. Some countries mentioned that they had no national Codex committee or that it was not well structured.\(^{102}\) Two countries stated that the implementation process was jeopardized when international agreements in the area of food safety and food control were not ratified or not put into effect, meaning presumably the WTO Agreements.

These problems persist if financial resources are lacking (8 countries,\(^{103}\) 18%), also for participation at Codex meetings ("in order to defend the national positions"). In such cases, issues related to the lack of technical infrastructure (6 countries,\(^{104}\) 13%) and trained personnel (3 countries,\(^{105}\) 7%) are difficult to resolve.

### 5.2.2 Areas not covered by the Codex Alimentarius

Firstly, countries found that the *Codex Alimentarius* did not cover comprehensively all aspects, and that some important areas are absent (e.g. the limits of microbiological parameters). Furthermore, countries referred to insufficient information on food additives, pesticides (in fresh fruits and vegetables) and veterinary drug residues, reflecting the apparently general problem of finding the relevant standard in the *Codex Alimentarius*.

Some countries pointed out differences between *Codex Alimentarius* standards and other national or regional standards (e.g. regulations of the United States Food and Drug Administration or the European Union) regarding accepted levels of food additives and contaminants and pesticide residues. During the development of the current food labelling and egg standards, it became apparent that “there are more areas in the Codex standards which would not necessary apply when national standards are applied”. This is especially problematic if toxicological studies at national level have not been carried out. “It would be important if *Codex Alimentarius* speed up the elaboration of all standards and international codes for good practices.”\(^{106}\)

Some standards for items of interest to countries are not covered by the *Codex Alimentarius*. Most of them concern regional/traditional/native products, thus being of a special interest to the country. “The *Codex Alimentarius* could be adapted and modified to make it locally-specific.”\(^{107}\)

### 5.3 National regulatory and structural strategies and international help

In order to raise national awareness and provide information on the *Codex Alimentarius*, countries have applied the following strategies: use of the FAO/WHO manuals/publications for education, inspection and analysis purposes, information programmes to promote the importance of *Codex Alimentarius* especially for trade use, or international cooperation projects, including specific FAO projects.

For the same purpose a number of countries\(^{108}\) have been working on the improvement of their national Codex committees, especially through the elaboration of “guidelines for optimization” or

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101 Albania, Cambodia, Dominican Republic, Guinea-Bissau, Lesotho, Papua New Guinea, Peru, Samoa and Zambia.
102 Albania, Peru and Zambia.
103 Burundi, Cambodia, Georgia, Guinea-Bissau, Mongolia, Paraguay, Samoa and Vanuatu.
104 Burundi, Cambodia, Georgia, Guinea-Bissau, Mongolia, Paraguay, Samoa and Vanuatu.
105 Burundi, Paraguay, Samoa.
106 Lebanon.
107 Swaziland.
108 For example: Lithuania, Peru.
“design of internal procedures”, inclusion of “the corporate sector, universities, and consumers” and the “creation of a web page of the National Codex Committee for the dissemination of the functional and technical standardization”.

One country proposed that “subjects raised and decided on in the Codex committees should be equipped with an appeal to Member States for an immediate and consequent implementation in the national legislation”.

For the areas not covered by the Codex Alimentarius, countries have referred to regional legislation (such as FDA, European, South American standards), and to available scientific studies or to consultation with FAO/WHO.

Besides enabling the participation of country representatives at Codex meetings, international organizations might help strengthen participation at Codex meetings through the review and evaluation of activities of the national Codex committees and through training workshops and consultancy concerning the Codex process for the national officers concerned. Examples of international help mentioned by respondents in this and other areas are given in Annex 6.

5.4 Participation at Codex meetings

Even though the questionnaire did not specifically ask about the usefulness of participation at Codex meetings, many of the responding countries used this question to make a reference to this point. Participation at Codex meetings has given countries “the opportunity to support the approval of standards”, “the understanding and desire at technical level for the need to coordinate food control activities”, and the possibility of “a forum for exchange of experiences among the Member countries”.

As further benefits of their participation at Codex meetings, countries mentioned improved collaboration between their ministries, a better understanding of the system, Codex documents and the importance of country positions, increased national knowledge and awareness of the importance of food safety, and expected increased efforts at country level (e.g. improvement of the food safety system).

Developing countries responding to the questionnaire underlined the difficulty “to accommodate their interest with the Codex policy”. “The fact that developing countries are underrepresented at Codex meetings does not facilitate a work of Codex adapted to the needs of developing countries. This situation, as well as the idiomatic problem of the texts and projects of Codex and the inopportune transfer of documentation drags the difficulty of expressing the observations of the developing countries on a timely basis, which results in the reality that established Codex Alimentarius standards cannot be fulfilled.”

However, one country realized that even small island countries can have an influence. “It will slowly come, for example in the last Codex Alimentarius Commission meeting in Rome in 2005, Pacific island countries saw the adoption of new work to develop a standard for “bitter cassava” proposed by Fiji and Tonga but is also an interest for us. Through the same procedures we can have other items pushed through.”

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109 Colombia.
110 El Salvador, Jordan.
111 Costa Rica.
112 Lesotho.
113 Zambia.
6. Involvement of other stakeholders

6.1 General observations

The involvement of other stakeholders in the food safety and control area takes the form of participation in administrative and legislative activities as well as of a recognized role in the food-chain.

The impact of involvement of stakeholders in the determination of food safety policy or even in legislative procedures varies. When the development status of a country is advanced, this generally implies an increase in national food import/export, together with a greater impact of stakeholders, industry and consumers. The effective involvement of stakeholders however depends on a granted right to active participation (“voice and vote”). On the latter point, most countries gave too little information to enable more specific conclusions to be drawn. This evaluation applies a graded scheme related to dominant and non-dominant participation, representation and the role of stakeholders responsible for achieving relevant food safety targets throughout the food-chain.

6.1.1 Involvement of the food industry

According to the 41 countries that responded to this question (89% response rate), the involvement of the food industry is perceptible in two ways: in the development of national food safety activities, and as responsible stakeholder with regard to national food safety targets throughout the food-chain.

Nine countries\(^\text{114}\) (22%) stated explicitly that their food industry played a role in national food safety policy, while 12 countries noted that the role of the food industry was not significant yet (29%).

The food industry or the respective sector has participated or been consulted in standardization, national codes of good practice and legislation processes in 18 countries\(^\text{115}\) (44%) or in the development of food safety policy in 14 countries\(^\text{116}\) (34%). “The fish processors were the instigators for the Draft Food (Fish Processing) Regulations.”\(^\text{117}\) For the European Union Member States this involvement is regulated in the Decision of the Council of 11 November 2003, No. 822/EC, on the accession of the European Community to the Codex Alimentarius Commission. “The national Codex contact point is the leader for cooperation with the EU Council Codex Alimentarius working party.”\(^\text{118}\) The industries “strongly support food safety initiatives for local consumption, for imported foods, as well as for food exports”.\(^\text{119}\) “The poultry industry has concluded an agreement with the Ministry of Agriculture to improve poultry health.”\(^\text{120}\) Strong industry associations “such as the Uganda Fish Processors and Exporters Association and the National Apiculture Development Organisation are capable of playing a significant role”.\(^\text{121}\)

\(^{114}\) Bolivia, Colombia, Costa Rica, El Salvador, Jordan, Paraguay, Poland, Romania and Uganda.

\(^{115}\) Bolivia, Burundi, Cambodia, Cook Islands, Costa Rica, Dominican Republic, Indonesia, Jordan, Morocco, Nicaragua, Nigeria, Poland, Romania, Rwanda, Seychelles, Tunisia, Vanuatu and Zambia.

\(^{116}\) Bolivia, Colombia, Costa Rica, El Salvador, Guinea-Bissau, Iran (Islamic Republic of), Jordan, Lebanon, Lesotho, Papua New Guinea, Paraguay, Uganda, Viet Nam and Zambia.

\(^{117}\) Cook Islands.

\(^{118}\) Poland.

\(^{119}\) Costa Rica.

\(^{120}\) El Salvador.

\(^{121}\) Uganda.
In 21 countries\textsuperscript{122} (51\%) the food industry is represented in the specialized agencies or committees (often the national Codex committee) dealing with food safety or implementing food safety strategies. In 6 countries (12\%), this is currently the only and small way food industry plays a role in national food safety policy.

6.1.2 Involvement of consumers

Consumers or consumer organizations participate in national food safety policy in 22 of the 41 responding countries\textsuperscript{123} (54\%). In 16 countries\textsuperscript{124} (37\%), they play a role as final recipients of food products. However, only 7 countries\textsuperscript{125} (17\%) stated that the involvement of consumers was significant, while 17 countries\textsuperscript{126} (42\%) reported that the role of consumers in their national food safety policy was not very dominant. Four countries\textsuperscript{127} (10\%) have neither consumer organizations nor representatives of this sector.

The involvement of consumers occurs in the form of representation in the national Codex committees\textsuperscript{128} or in technical committees for standardization\textsuperscript{129} as well as of involvement in the drafting of legislative acts.\textsuperscript{130} Such participatory status may even be guaranteed by a legal act. “The “consumer protection law” determines legal approval of the customer’s right including active participation in policy development for food safety issues.”\textsuperscript{131} Nevertheless the impact of this involvement depends on their formal objective rights. For example, it can be assumed that a status “considered as guests”\textsuperscript{132} is not very significant. Their influence might gradually improve if countries provide for legally established national offices for consumer protection\textsuperscript{133} or consumer sections in the ministries\textsuperscript{134} and for their participation in decision-making committees even if independent consumer associations are absent or weak.\textsuperscript{135}

On the other hand, consumers provide a recognized “social control on food safety, demonstrated by establishing public opinion, pushing the parliament and government on consumer food safety protection”. This is particularly the case if countries\textsuperscript{136} provide for the possibility for consumer complaints at the administrative level. “The recently established Food Information Centre aims to involve consumers in food safety policy.”\textsuperscript{137} “A platform for the care of the consumer exists that gathers all the requests and consultations of consumers in a single control mechanism.”\textsuperscript{138} “The National Agency for Consumer Protection is registering their complaints regarding labelling of food

\textsuperscript{122} Bhutan, Bolivia, Burundi, Cook Islands, Costa Rica, Dominican Republic, Iran (Islamic Republic of), Jordan, Lebanon, Lesotho, Nicaragua, Nigeria, Papua New Guinea, Peru, Philippines, Romania, Samoa, Seychelles,Suriname, Uganda and Zimbabwe.

\textsuperscript{123} Bolivia, Burundi, Costa Rica, Dominican Republic, Ecuador, Jordan, Lebanon, Lesotho, Mali, Mongolia, Morocco, Nicaragua, Niger, Nigeria, Peru, Poland, Romania, Rwanda, Samoa, Suriname, Uganda and Zimbabwe.

\textsuperscript{124} Bhutan, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guinea-Bissau, Indonesia, Mongolia, Papua New Guinea, Peru, Romania, Samoa, Vanuatu, Viet Nam, Zambia and Zimbabwe.

\textsuperscript{125} Jordan, Lebanon, Mali, Mongolia, Niger, Poland and Uganda.

\textsuperscript{126} Bhutan, Bolivia, Cambodia, Colombia, Cook Islands, El Salvador, Georgia, Haiti, Iran (Islamic Republic of),Lesotho, Lithuania, Nigeria, Paraguay, Philippines, Swaziland, Syrian Arab Republic and Vanuatu.

\textsuperscript{127} Cambodia, Cook Islands, Paraguay and Vanuatu.

\textsuperscript{128} Bolivia, Costa Rica, Ecuador, Dominican Republic, Jordan, Mali, Nicaragua, Nigeria, Peru, Rwanda, Samoa, Suriname and Uganda.

\textsuperscript{129} Bolivia, Burundi, Costa Rica, Jordan, Nicaragua, Nigeria, Peru, Romania, Rwanda, Samoa and Zimbabwe.

\textsuperscript{130} Mongolia, Morocco.

\textsuperscript{131} Mongolia.

\textsuperscript{132} Peru.

\textsuperscript{133} El Salvador.

\textsuperscript{134} Lesotho.

\textsuperscript{135} El Salvador, Lesotho.

\textsuperscript{136} Costa Rica, Iran (Islamic Republic of), Papua New Guinea and Samoa.

\textsuperscript{137} Iran (Islamic Republic of).

\textsuperscript{138} Costa Rica.
products, requiring at the same time to solve the situation.” By reporting on any violation of the law or the appearance of unsafe food on the market, they may have a fundamental impact on national food safety activities. Already in most of the responding countries, a right to safe food consumption seems to be recognized. “The Consumer’s Defense Law was already promulgated; therefore, the consumer sectors will have greater capacity to require greater quality levels and food safety.” “Regarding information offered to consumers, legal provisions are stating that the consumer has the fundamental right to be informed in a complete, concise and correct manner about characteristics of products and services.” Otherwise, “the only way consumers can raise their voices is by the way of writing letters to the national newspaper or expressing their views online”.

6.2 Problems and difficulties encountered

In 16 of the 31 countries answering this question (52%), the lack of knowledge, education and awareness of the importance of food safety renders the involvement of other stakeholders in food safety activities difficult. If neither the industry nor the consumers are aware of their role in the food safety system and of the importance of food standards in trade, they are not motivated to participate.

Twelve countries (39%) reported a lack of informed and trained personnel among stakeholders or in stakeholder organizations. Eight countries (26%) underlined particularly the involvement and presence of consumers in national food safety activities as an important requirement for further progress.

As contributing factors, failures in the dissemination of information and communication to raise the awareness of stakeholders are caused by a poorly functioning infrastructure in 7 countries (23%). Five countries (16%) referred to insufficient financial resources. Three countries mentioned the lack of national commitment to set up a useful national food safety policy. “Again as mentioned a few times in this questionnaire, at present food safety is not a priority area for the country which contributes to the poor collaboration between all necessary parties.” The involvement of consumers in standard setting, the development of laws and law enforcement “requires a national commitment to open and transparent governance”.

6.2.1 Involvement of the food industry

The involvement of the food industry can be hampered “as the policy-making process does not provide for a structure for their presentation”. Two countries mentioned as a reason “the industry’s emerging status and small size” and thus “a production used for national consumption, not for exportation”. But the involvement of the food industry can be insignificant even “despite the fact of their numerous existence and lobbying in the parliament and government”, as for example “currently the food control authority tends to be the one that imposes food safety standards without the involvement of both the food industry and the consumers. Even the National Codex Committee is not composed of members from the food industry”. On the other hand, there can be a problem of

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139 Romania.
140 Dominican Republic.
141 Romania.
142 Bolivia, Burundi, Cambodia, Costa Rica, Haiti, Lesotho, Morocco, Nicaragua, Nigeria, Papua New Guinea, Paraguay, Romania, Rwanda, Samoa, Suriname and Zambia.
143 Bolivia, Lesotho and Paraguay.
144 Colombia, Ecuador, Guinea-Bissau, Iran (Islamic Republic of), Mongolia, Nigeria, Papua New Guinea, Paraguay, Rwanda, Suriname, Syrian Arab Republic and Uganda.
145 Bolivia, Colombia, Dominican Republic, Lithuania, Peru, Philippines, Romania and Zimbabwe.
146 Bhutan, Guinea-Bissau, Paraguay, Rwanda, Samoa, Uganda and Zambia.
147 Costa Rica, Georgia, Iran (Islamic Republic of), Paraguay and Uganda.
acceptance from the industry side. “Some of the large food producers engage in training and development of their staff, but do not respect the government and act independently of its requirements.” “Many companies would rather deal through their foreign-based mother companies.”

Countries recognize a “lack of implication of stakeholders in the work undertaken to improve the status of food safety”. “The operation of a food safety system relies on an in-depth involvement of the stakeholders, which is still needed.”

The reluctance of the national food industry to participate in food safety activities may be based on the fact that “the involvement and contribution of the food industry is limited to the big industry, especially the multinational industry, while the actual food safety problems are happening in the SMEs/local industries”. Even though the industry has recognized the importance of an upgraded food safety system and the role they play in this, “they are suffering from financial problems that are hindering the foreseen changes”.

6.2.2 Involvement of consumers

If consumer associations exist, they are often small, weak and not well facilitated and thus have no influence on national food safety policy. “The recently established Association for consumer protection is still at the beginning of its job, consequently its role is limited to publish some information in local newspapers and sometimes to hold informative seminars.” “The Consumers Association is in place but lacks a structure, which could extend its wings to various parts of the country.” “Although recognized consumer organizations exist, they are not represented at national level.”

“Due to the lack of special knowledge the participation of consumers at the specialized national subcommittees related directly to Codex is practically non-existent.” A cause for this may be “the misconception and misunderstanding of food labelling by the consumers” or the development status of the country. “We are a developing country with its problems. The awareness to consume safe food has to grow. People often buy food which is cheaper but not safe [rather] than food which is expensive but safe.”

Deficient coordination in the ministries and in consumer associations and high staff turnover owing to poor salaries contribute to the difficulty of maintaining an adequate mechanism to resolve food safety complaints in an efficient manner.

6.3 National regulatory and structural strategies and international help

Many countries have realized that it is important to engage key stakeholders at different levels in order to come to a national dialogue and understanding on food safety and control. “Based on Protocol No. 1795/1780/29.12.2004 signed by the National Food Safety Authority and the Food Industry Federation with the declared purpose to represent food industry in all its actions and to promote the interests of its members, it was agreed to cooperate and common actions were decided to be carried out by the two organisms.”

Even though some countries may not believe that “a policy for the industrialization of the country would be necessary” in order to improve the situation, they have nevertheless initiated activities

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148 Haiti, Iran (Islamic Republic of), Lithuania, Mongolia, Syrian Arab Republic and Uganda.
149 Cambodia, Indonesia, Lesotho, Paraguay, Papua New Guinea, Peru, Romania, Samoa and Vanuatu.
150 Romania.
151 Guinea-Bissau.
and training to create awareness, especially among the private sector/SME industry and consumers through a national forum and within the framework of international cooperation projects. National Codex committees may also play an effective role for introducing food safety/Codex within the governmental sector and gradually to the other stakeholders.

“Regarding the grading of food outlets, an educational campaign for consumers and food business owners will be required. This exercise will assist consumers to make informed choices when purchasing food commodities. It will also motivate food business owners to improve their food handling practices. Workshops for food inspectors on related issues such as the development of a standard inspection form for consistency in inspections and grading of the premises would be required.”

International help to increase the involvement of stakeholders might represent the organization of workshops and training programmes for the involved stakeholders, information and orientation in Codex matters to create awareness of its importance, as well as technical guidance on the main strategies for action and the organizational structure for stakeholders in order to become active.

Of the 23 responding countries, 14 countries (61%) stated that compliance with international standards facilitates or will facilitate the country’s access to international trade. “National food industry follows the principles of HACCP designed by Codex Alimentarius. It helps to execute the international trade.” The international standards serve as a great support for the domestic economy because they avoid the duplication of work and improve the access to the international markets and protection of the national market.” International standards, such as the Codex Alimentarius, were considered as “a boost for ensuring food safety of imported and exported food” and the “basis for attaining food standards compliance”. This effect may even incite countries to undertake the relevant legislative changes. “No problems in export of food products, whereas some problems in import of food products due to differences in standards. Now we are trying to bring national standards close with international standards.”

In general only the international standards that concern the country’s main export/import products or specific national consumption and health interests are considered to be important. Thus it can be observed that even small and developing countries can meet the standards required for such products. “In respect to food trade, the food production sector, importers and exporters of foods mainly depend on international standards, for the EU market they follow the requirements from exporters, and for other markets they usually follow the Codex standards.”

On the other hand, 10 countries (44%) suggested that small and medium enterprises that lack capacity and resources cannot meet international standards. These help only “the better provided

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152 Indonesia.
153 Lesotho.
154 Paraguay.
155 Vanuatu.
156 Swaziland.
157 Colombia, El Salvador, Haiti, Iran (Islamic Republic of), Lebanon, Nicaragua, Papua New Guinea, Philippines, Romania, Rwanda, Samoa, Tunisia, Uganda and Viet Nam.
158 Lithuania.
159 Indonesia, Paraguay.
160 Iran (Islamic Republic of), Philippines.
161 Rwanda.
162 Syrian Arab Republic.
163 Cook Islands.
164 Viet Nam.
165 Albania, Bolivia, Cambodia, Ecuador, Indonesia, Mali, Mongolia, Niger, Paraguay and Swaziland.
industries with capacities for export/import”. Thus international standards constitute an obstacle to access to the international and even the national market. “Only the bigger exporting producers can afford to apply the respective international standards.” While international standards have helped, from the public health point of view, in the improvement of food handling practices and procedures, particularly in the meat and canning industries, many local producers are not in a position to meet the required standards for export purposes thus hampering the local economy. “Even if the international standards support the economy in terms of benchmarking the quality of foodstuff available in the country and in the cases of absences of food standards, food and beverage producing companies tend to subscribe to minimum international standards.” This is due to the little influence that the country has at the moment when an international standard is prepared and the little participation that it has as a country. “There are international regulations that require more than the regulations from Codex Alimentarius and that become technical barriers to trade.”

Other countries stated that for their food industry, international standards are currently irrelevant. This is the case if the country’s trade depends exclusively on a few trading partners that do not apply international standards. “The international standards, being applicable mainly to the developed countries, are not of great relevance to a LDC. Most of the trade is between neighbouring countries like India and Bangladesh. These countries are following their own rather than international standards.” “We have not yet seen any significant impact of these standards.” This can also be the case of non-existent national regulations, when the legal reference for the industries is the regulation of its importing partner country. Lastly a country might become subject to standards of the importing countries “since international standards in some fields are not updated on a timely basis or do not address several sectors and products”. In all those cases the producers and exporters of some products may confront difficulties because of the requirements of importing countries. Difficulties arise when requirements cannot be met, for example in countries with very small economies or in general “due to the lack of the national infrastructure in food control”.

7. Conclusions

National food safety activities depend on the development status and internal policy of the individual country. As food safety is built on various foundations and driven by a variety of players, national differences in implementation exist at the political, administrative and legislative level. The problems jeopardizing the achievement of food safety derive simultaneously from the legislative framework, administrative organization, provision of facilities and resources, and political commitment.

Of the responding countries, 48% stated that a national policy, strategy or programme on food safety had been put in place or was in the process of being developed. Political awareness of the importance of food safety has been raised mainly by incidents of unsafe food on the national or international market that represented health and economic threats for the country concerned. Depending on the financial and technical resources needed to achieve objectives, countries have established a structured administration in order to accelerate the implementation of food safety activities, have elaborated national food safety legislation or have improved the organization of their national food control system in order to be able to comply with the requirements of the international market. Improvement in developing countries might also be achieved by international food security programmes on condition that they are provided with a strong link to food safety.

166 Albania, Indonesia and Paraguay.
167 Albania.
168 Swaziland.
169 Samoa.
170 Bolivia.
171 Ecuador.
In the majority of responding countries, several ministries and specialized national agencies participate in the administration of food safety. These are mainly the governmental areas of health (80%), agriculture (74%), and industry and commerce (24%). Of the responding countries, 73% reported on administrative competences in ministries for risk analysis, and 86% reported that they conducted food control on the different sectors of the food production system. Little information was given however on the necessary integrating range to cover the whole food-chain from farm to consumer. Of the responding countries, 74% reported that there were responsible and competent authorities for emergencies or specific emergency incidents in their administration.

National food safety administrations are unsuccessful often as a result of inadequate coordination and communication among the various responsible entities. Moreover the lack of necessary infrastructure and personnel, of legislation and standardization, and of financial resources are the main factors that slow progress in more specific administrative actions such as risk analysis, food control on the different sectors of the food production system and emergency response. Improvement has come with the elaboration of a national policy with food safety objectives or the establishment of an intermediary national institution (e.g. a national food safety agency or standardization office) that brings together all sectors and stakeholders involved in the national food-chain. Progress has also been made if the goal to attain a safe food production system for the domestic as well as the export market is based on a regulatory framework that provides for the distribution of responsibilities.

In general, all countries considered the existence of a food law to be a necessary basis to ensure food safety. Only 15% of the evaluated countries did not have applicable national food safety legislation to date. Of the responding countries, 65% reported the existence of a “food law”, while 70% have different laws and regulations covering the various aspects of food safety issues. A proportion of 31% stated that they had recently (in the course of the past two years) modernized their legislation, while 54% have done so since 1995 (entry into force of the SPS Agreement), and 39% are in the process of updating existing legislation. While newer trends suggest that legislation should provide a full framework including tools, standards and guidance for industry and other stakeholders to achieve safe food, countries with less elaborate legislation have often accessed to a regulation based solely on specific standards for specific food groups. Considering the problems and difficulties mentioned by respondents, one may consider that the status of food safety legislation in most of the countries concerned is still insufficient to enhance food safety at all levels of production. This is reflected by the fact that only a minority of the countries reported modernized legislation or a declared political intention to modernize legislation in order to comply with international legal requirements, such as the WTO Agreements and the Codex Alimentarius.

The involvement of other stakeholders in the food safety and control area takes the form of participation in administrative and legislative activities as well as of a recognized role in the food-chain.

The role of the food industry is not significant yet according to 29% of the countries. The national food industry or the respective sectors have participated or have been consulted in regulatory processes in 44%, and in the development of the food safety policy in 34% of responding countries. The food industry is represented in the specialized agencies or committees (often the national Codex committee) dealing with food safety or implementing food safety strategies in 51% of the countries. In 15%, this is currently the only small way food industry plays a role in national food safety policy. Although these forms of involvement do not always mean that the food industry really plays an active role, one might consider that the significance of industry participation increases depending on the development status of the country and its food export/import activities. This is also due to the fact that international food safety standards primarily support the bigger food
industry with its exporting/importing activities, whereas the activities of small and medium enterprises that represent a majority in economically less developed countries face greater problems to comply. This means also that if the government does not act in food safety activities, it may become over-directed by its industry or other external driving forces for national agriculture and food production.

In 37% of the responding countries, consumers play a role in their function of final recipient of food products. However, only 17% of the countries stated that the involvement of consumers in national food safety policy was significant, while 42% reported that the role of consumers was not very dominant; 10% of the countries have neither consumer organizations nor representatives of the consumer sector. In general so far the influence of consumers has been less significant than that of other stakeholders.

Lack of targeted information has often led to a situation where neither the industry nor consumers nor the administrations are aware of their role in the food safety system and of the importance of food standards in trade. Furthermore, food control in the industry and consumer complaints may be ineffective because of a poorly functioning administrative infrastructure or insufficient regulation. In these cases, national Codex committees may play an effective role to introduce food safety to stakeholders.

In 67% of the responding countries, the Codex Alimentarius is used as a baseline for national laws, regulations and standards. In 22% of the countries, Codex Alimentarius standards are often adopted and declared as national standards whenever national standards or food safety legislation in the respective areas are not available. The implementation of the Codex Alimentarius at national level is mainly hindered by a limited capacity to generate the information flow needed to create public awareness of the importance of the Codex Alimentarius, especially among the actors in the food-chain, but also within the administrative and political entities responsible for food safety. Countries identified the cause as being the lack of financial resources as well as the difficulties of participating at Codex meetings. Some developing countries particularly mentioned as a negative effect of non-participation an impossibility to meet the standards developed by the Codex Alimentarius Commission. This was confirmed by the small island countries that noted a possible positive influence of their participation in Codex meetings on standard-setting procedures.

Problems concerning the application of the Codex Alimentarius have arisen because of a lack of timely distribution or publication of the versions of the Codex standards and other documents in the official languages. Furthermore countries find that the Codex Alimentarius does not comprehensively cover all aspects or may even omit some important areas. Countries also refer to existing differences between Codex Alimentarius standards and other national or regional standards (e.g. FDA and EU regulations) regarding accepted levels of food additives and contaminants and pesticide residues. Certain standards for items of interest to countries, especially concerning regional products, are not covered by Codex. Notwithstanding the strategic objective of the Codex Alimentarius Commission to promote sound regulatory frameworks and the widest and most consistent application of scientific principles and risk analysis, this underlines the need for improvement of the work of Codex meetings concerning greater usefulness of Codex Alimentarius standards to Member nations in terms of relevance to their needs as well as timeliness. FAO and WHO might provide further international help for countries to solve food safety problems relevant to national food trade.

In order to raise national awareness of the importance of the Codex Alimentarius for trade, countries have used the FAO/WHO manuals/publications for education, inspection and analysis purposes as

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well as information programmes, or have benefited from international cooperation projects. Countries have also reported on the process of establishment of their national Codex committees that primarily help to coordinate food safety activities. Besides participation at Codex meetings, countries suggested specific international help adapted to national needs for further progress in food safety activities. This might suggest an extended use of Codex Trust Fund resources as well as combination with other relevant international funding mechanisms (especially the Standards and Trade Development Facility).¹⁷³

### Annex 1

#### List of responding countries

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<th>Country</th>
<th>Codex region</th>
<th>Development status</th>
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| Total | 14 | 11 | 5 | 4 | 6 | 6 | 14 | 18 | 23 | 5 | 36 |
Annex 2
Questionnaire documents

1. Background information

A. Research proposal
1. To collect information from a selection of countries that have participated in Codex Alimentarius Commission meetings through support from the FAO/WHO Codex Trust Fund, by using a written questionnaire completed by the countries Codex Contact Point.
2. To analyse and report on the identified results in summary form.
3. With the permission of the relevant countries’ Codex Contact Points, to gather further information and report specific countries’ efforts and progress and report this by the way of case studies.

B. Researcher
The investigation is being undertaken by Dr Karola Krell, under the guidance of Dr Jørgen Schlundt, Director, Department of Food Safety, Zoonoses and Foodborne Diseases, World Health Organization, Geneva, Switzerland.

C. Background
The Codex Alimentarius Commission develops food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Programme in order to protect consumer health and to ensure fair practices in the food trade.

These standards do not protect consumers unless they are properly implemented and enforced through a functioning food control system at national level (e.g. by comprehensive and current legislation, food monitoring and foodborne disease surveillance, licensing and inspection, political and institutional support and stability). The applicability of an international standard for use in domestic legislation depends on the ability of a country to enhance its administrative and/or legal system.

D. Purpose of questionnaire
Considering that the work of the Codex Alimentarius Commission has been greatly influenced by high-income countries, this questionnaire will assist to identify and highlight the outcome and benefits of participation in the activities of the Codex Alimentarius Commission by low-, lower- and upper-middle-income countries.

This questionnaire is addressed to selected low-, lower- and upper-middle-income countries of the Codex Alimentarius Commission and participants of the Codex Trust Fund, that have shown progress or a commitment to progress in the securing of food safety in their countries.

This questionnaire aims to:

- provide reliable data on national activities in relation to, or affected by, the work of the Codex Alimentarius Commission, especially the forms of political, administrative and legal transition and commitment to enhance food safety;
- find out how participation has impacted on the implementation of Codex Alimentarius standards at the national level, and by this way identify strategies that have been used to overcome problems or areas where improvements can be made;
- identify elements of food safety regulations that countries see as the most important to ensure a higher level of food safety;
improve the efficiency of the use of the FAO/WHO Codex Trust Fund resources by demonstrating results in the form of a report and case studies in selected countries, for the information and use of members of the Codex Alimentarius Commission and the FAO/WHO Codex Trust Fund administration.

E. Request to Codex Contact Points
Codex Contact Points are kindly asked to complete the attached questionnaire. Answers should be sent back by 15 February 2006.
If you require assistance in completing the questionnaire or have any questions, please contact the investigator Dr Karola Krell:
E-mail: krellzbindenk@who.int
Tel: +41 22 3799552, (on Tuesday: +41 22 791 1624)
Fax: +41 22 791 4807

Information and data will be analysed in a report about the progress on food safety in low- and lower-middle-income countries in relation to the work of the Codex Alimentarius Commission.

Please note that only with your approval will the final report or case study specifically refer to your country or mention your national efforts. In this case the investigation may be extended by way of telephone interviews or further questionnaire regarding the specific issues for individual countries.

2. Questionnaire

To be completed by the country’s Codex Contact Point

Completed by:
Name:
Title:
Organization:
Contact e-mail address:
Contact telephone number:
Contact fax number:

1. Food safety in the national policy
Do you have a national policy on food safety activities? Were there any factors that caused or strengthened this commitment, e.g. food safety crises, a national or international incident?

What problems and difficulties have been encountered in this area? What resolution strategies have been used? How could the international organizations, (including WHO, FAO, etc.), help to raise political commitment for food safety?

2. Food safety in the national administration
Which department/s or ministry/ies of your administration handles the issue of food safety? In particular, how do you undertake or organize
- the risk analysis
- the food control on the different sectors of your food production system
- the response system for emergencies?

What problems and difficulties have been encountered in this area? What resolution strategies have been used? How could the international organizations (including WHO, FAO, etc.) help to raise administrative commitment for food safety?
3. Food safety legislation
What national food safety legislation or other kind of regulations on enforcement of food safety
does your country have? Do you have a food law? If yes, since when is it applicable and at which
(cenral, provincial and/or local (urban/district)) level? Which authority is empowered to make
rules and regulations under the food laws at the central, provincial and/or local (urban/district)
level?

What problems and difficulties have been encountered in this area? What resolution strategies have
been used? How could the international organizations (including WHO, FAO and the Codex
Alimentarius Commission) help to improve efforts on legislating food safety?

4. Use of the Codex Alimentarius
How was and is the Codex Alimentarius useful in your country? Does your national legislation
apply or refer to the Codex Alimentarius? While implementing Codex Alimentarius standards did
you discover any areas that are of your national interest and that are not currently covered by the
Codex Alimentarius?

What problems and difficulties have been encountered in this area? What resolution strategies have
been used? How could the international organizations (including WHO, FAO and the Codex
Alimentarius Commission) help to raise and strengthen the use of the Codex Alimentarius in your
country?

5. Involvement of other stakeholders
What role does your national food industry play in the determination of your food safety policy? In
respect to your national food production-sectors and your import and export of food, if any, how are
international standards supporting or hindering your economy?

What role do the consumers in your country play in the determination of your food safety policy?
How is this demonstrated?

What problems and difficulties have been encountered in this area? What resolution strategies have
been used? How could the international organizations (including WHO, FAO and the Codex
Alimentarius Commission), help to improve the involvement of these stakeholders in your food
safety policy?

6. Other issues
What other significant achievements have been made in food safety in your country? What novel
and innovative solutions have been used to address problems? Are there any other comments that
you wish to make to improve the results of this investigation?

7. Case study
Are you interested in your country being described in a more detailed case study that will be of use
to help other countries improve their food safety efforts?

8. Completion
Please complete your questionnaire and send it by 15 February 2006 to the Department of Food
Safety, Zoonoses and Foodborne Diseases, World Health Organization, preferably per email to:
krellzbindenk@who.int, or fax: +41 22 791 48 07, or per normal mail to 20, Avenue Appia, CH-
1211 Geneva 27, Switzerland.
If you require assistance in completing the questionnaire or have any questions, please contact the
investigator Dr Karola Krell:
E-mail: krellzbindenk@who.int, Tel: +41 22 3799552; fax: +41 22 791 48 07.
Annex 3

Codex Alimentarius: examples of positive developments and benefits

1. Use of the Codex Alimentarius

Bolivia
“The Institute of Standardization and Quality, a private, nonprofit and national wide entity takes the current Codex regulations as a reference for the preparation of the voluntary standards.”

Cambodia
“We have come to an agreement that we will eventually automatically adopt the Codex Standards and thus work towards meeting international trade requirements.”

Cook Islands
“It makes us aware of the international recognized standards which will help the industry to export to oversea markets.”

Costa Rica
“The Codex standards, their codes and directives are of great importance for the standardization of the national regulations of our products and the commercial exchange of the food products. Based on Codex we have managed to standardize criteria between the government, the academia, the consumers, and the private sector. Codex has opened us the doors and contributes to our work in the preparation of standards and the promotion of the ones that benefit the national food production, mainly of our crops. When the country does not have specific regulations, the Codex standards have to be applied.”

Ecuador
“Codex Alimentarius is the basis for the national regulation.”

El Salvador
“Our National Committees of Codex Alimentarius has the responsibility to adapt or adopt the Codex Standards. What or which standards we work on depend of the demand from national offices or private producers. Our law obliges to enforce Codex Alimentarius Standards.”

Georgia
“Currently Codex standards are translated and published in Georgian and represent a basis for national standards. The NGO “Codex Alimentarius Principles’ Centre of Georgia” elaborates recommendations for the government about food safety issues in the Codex Alimentarius. Lacking sufficient funding the activities of the NGOs are difficult.”

Guinea-Bissau
“In our country the Codex Alimentarius helps to ensure a legal policy conscious of the nutritional value and the quality of products in order to protect the consumers.”

Jordan
“Internationally established standards and particularly those established by the Codex Alimentarius Commission are adopted whenever they meet the objectives and the acceptable level of risks
considered appropriate for the country. Available are more than 300 food standards. Most of these standards are Codex-based. The Codex guidelines, standards, and code of practices are considered as a primary reference for national food standards and technical regulations.”

Kazakhstan

“During the elaboration of the Bill materials of Codex Alimentarius were very useful. The Codex norms and standards will also be used during the elaboration of sanitary and epidemiologic rules and norms, as well as veterinary rules.”

Morocco

“Codex Alimentarius is an essential source of technical norms for the administrative institutions in charge of elaborating and applying food control regulations. It can serve at the same time as a scientific basis for the preparation of national norms and as a reference for commercial trade with other countries.”

Papua New Guinea

“At this stage (without having a Food Safety Policy yet) Codex Policy is used to address this areas, by having training and using the Codex Trust Fund to attend the Codex meetings.”

Peru

“The basis of the development of the sanitary standards has been the corresponding standards of Codex Alimentarius. The regulation for health monitoring of food and beverages for human consumption is based on the General Principles of Food Hygiene of Codex Alimentarius. In addition, our law establishes that the provisions of Codex Alimentarius will be applied, if there is a lack of specific sanitary standards.”

Poland

“These documents often are the only point of reference while analysing the risk of contaminants and harmful substances contained in food and food additives for which limits have not been set yet. Also documents elaborated by Codex Committee on Methods of Analysis and Sampling are useful for laboratories for implementation and estimation methods of analysis. Code of good manufacturing practice caused reduction of contaminants in food. Food producers refer to the Codex guidelines and recommendations on a voluntary basis.”

Samoa

“Codex Standards as well as copies of relevant international standards are used as a benchmark to resolve the many difficulties we have in outlining what to include in the related standards, which have become relevant in terms of problems encountered from trade.”

Tunisia

“In recognition of the Codex Alimentarius promotion of HACCP as a food safety tool the country has set up a pilot programme on HACCP to develop an internationally recognized infrastructure for food hygiene, which shall improve the food safety conditions in the agro-food industry.”

Viet Nam

“Up to now, the national standards on food and hygiene and safety, national requirements and provisions are almost all based on the Codex Standards. At present we have the plan to translate all those Codex standards that they find useful for the country into the national language, so that they can serve the food production-sectors, food importers and exporters.”
**Zimbabwe**

“We are now basing all food legislation on relevant Codex Alimentarius standards and its other texts since 1996, when the Food Standards Advisory Board was established.”

**2. National Codex committees**

**Cambodia**

“As a result of its involvement in the work of the Codex Alimentarius Commission the National Codex Committee (8 ministries) was established, chaired by the Minister of Commerce. However this Committee only meets once or twice a year.”

**Iran (Islamic Republic of)**

“The National Codex Committee has a newly established structure. It is under the supervision of a National Coordination Council of Codex, composed of five Ministers. This new activity has helped to raise the national interest among all stakeholders for food safety.”

**Lithuania**

“National Codex Committee was established in 1997. The national coordination mechanism includes formulating of country response to the proposals of Codex Alimentarius Commission (CAC); nominating delegates to represent Lithuania at Codex meetings; advising the Government on the best possible decisions regards Codex standards; setting the priorities in elaboration of National standards; organizing the seminars with participation of Codex experts.” The country has even elaborated “The guideline for the optimization of the Codex Committee Activity”.

**Mongolia**

“At initial stage, since 2004 the Codex team has worked on the translation of Codex standards into the national language and the distribution of Codex committee related materials and documents to respective bodies. In the future, the team will be working to bring national standards in conformity with international standards.”

**Morocco**

“The importance of the work of Codex has led to the establishment of the National Codex Committee, which coordinates all national structures involved in food safety in order to advise the government in the case of problems in standardization processes and food safety issues addressed in the Codex Alimentarius.”

**Peru**

“Through Supreme Decree, the Codex Alimentarius National Committee was created as an entity of inter institutional coordination in charge of doing a periodic review of the sanitary standardization with regard to food safety, with the purpose of proposing its harmonization with the international standardization applicable to the matter.”

**Poland**

“The Agricultural and Food Quality Inspection acts as the FAO/WHO Codex Contact Point and performs its function according to the Codex Alimentarius Commission “Procedural Manual” and the Decision of the Council of European Union of 11 November 2003 No 822/EC on the accession of the European Community to the Codex Alimentarius Commission. Codex Contact Point coordinates the national activities for achievement of consensus on matters subject to the Codex
Alimentarius with all interested and involved authorities, official control bodies, research and scientific institutes, consumer associations and other stakeholders.”

**Romania**

“The National Codex Alimentarius Committee decided that at the initial stage, the work should be done in the following five subcommittees: Subcommittee for labeling; Subcommittee for sampling and analyzing methods; Subcommittee for food hygiene; Subcommittee for Inspection of import/export and Certification System; Subcommittee for Additives, Contaminants and residues of Pesticides. Next stage involves identifying specialists to participate at above-mentioned committees.”

**Samoa**

“The Codex Contact Point, which was taken up in 2003 by the Ministry of Commerce, Industry and Labour, has increased awareness of the stakeholders in food related standards through the provision and sharing of Codex materials, reports and relevant comments on certain Codex issues of relevance to the members.”

**Uganda**

“The National Codex Committee was inaugurated in June 2002 during a FAO Workshop on responsibilities and functions of a National Codex Committee. The objective of setting this committee was to create an effective mechanism for considering the government’s National Food Control requirements in relation to the work of Codex Alimentarius Commission Food Standards Program. The function of the National Codex Committee is to consider and discuss technical issues on food standard program such product specifications, safety issues, etc. NCC therefore advises the central government on application of various food standardisation and food safety matters arising out of the work of Codex Alimentarius Commission.”

3. **Participation at Codex meetings**

**Costa Rica**

“Through the forums for the Commission of Codex we have the opportunity to support the approval of standards that favor the international trade and the health protection and the consumers’ rights.”

**Lesotho**

“Due to participation in Codex, there is now understanding and desire, at technical level, of the need to coordinate food control activities, but this needs to be underpinned by appropriate policy framework.”

**Papua New Guinea**

“At the same time we now begin to participate in international food standard meetings, settings and appreciate its importance for the purpose of international trade and safety of food we consume.”

**Vanuatu**

“Codex Alimentarius is a new area for the country even though we have been a member for several years now. Because it is a very technical topic, the understanding of it all is very limited. I myself as Contact Point and the National Codex Committee am slowly getting a better grasp of the procedures. The first time I heard of Codex Alimentarius was in 2000 and all I knew was that it is a standard setting body. Over the years as I started to attend a codex meeting then I slowly began to understand it a little better through reading and talking to others both at a national and international level. But I must say that a training workshop that was held in our country early this year organized
by FAO plus my attendance to the Codex Alimentarius Commission meeting that took place in Rome this year gave me a much better understanding of Codex.”

_Zambia_

“Participation in meetings has been helpful, also as a forum for exchange of experiences among the Member countries.”
Annex 4  
Examples of national regulatory and structural strategies

1. Food safety policy

_Bhutan_  
Bhutan has used the “10-Point Regional Strategy for Food Safety in the South-East Asia Region”.

_El Salvador_  
“FAO has helped in Good Agricultural Practices and Food Trade; WHO in food handling and Good Manufacturing Practices.”

_Lebanon_  
“Food safety program as collaboration work between the government and international bodies (UNIDO, FAO, WHO) to organize training workshops and public awareness activities in order to upgrade the food safety system.”

_Lithuania_  
“WHO Sixth Futures Forum on Crisis Communication”.

_Zimbabwe_  
“Five Year Strategic Plan agreed upon at the Regional conference for food safety in Africa (October 2005)”

A. Establishment of intermediary national administrative institutions

_Costa Rica_  
Costa Rica has created the Intersectorial Commission for Food Safety (ICAI). The Commission assembles a wide spectrum of public institutions and private organizations with the purpose to assure safety in the agroalimentary chain and at the same time to improve the processes of production and competitiveness of the country in the international trade.

_Haiti_  
Haiti has put in place an inter-institutional committee (composed of the representatives in charge of official control) to coordinate activities in order to draft a food law for the national government. This was the result of a cooperation programme with FAO to strengthen national capacities in food control.

_Nigeria_  
Nigeria has established a National Food Safety Management Committee made up of members of all ministries and agencies involved in food safety. Here food safety issues are being proposed by using the platform of the National Codex Committee that is well established and functional.

_Poland_  
Poland recently established the Board for Food Safety System, an opinion making and advisory body of the Prime Minister, composed of representatives from five ministries, which aims to study existing national food safety and quality legislation and to elaborate a uniform and integrated
national system for safety and quality of food.

**Syrian Arab Republic**

The Syrian Arab Republic has set up “a national committee for food safety in which representatives from all authorities in Syria shall participate. Besides, a suggestion was made to set up a “General Organization for Food” to be responsible for all aspects concerning food safety.”

**B. Food legislation**

**Bolivia**

Bolivia approved a Supreme Decree in 2005 to create a mandatory Unique National Health Registry for Food and Beverages to guarantee the safe marketing of foodstuffs.

**Zimbabwe**

“Through projects such as: “Strengthening Food Legislation…” FAO 198…which led to updating food legislation, creating the Food Standards Advisory Board; “Strengthening the Food Safety Control…” FAO 199…resulted in the Food Safety Control Bill, being processed for enactment soon. This will create the Food Safety Control Authority which will be in charge to ensure safety of all food available/consumed in Zimbabwe.”

**C. Detailed national food safety policies and strategic orientations**

**Colombia**

The National Policy of Agricultural Health and Food Safety of Colombia includes four strategic orientations: institutional adaptation and strengthening of the national system of sanitary and phytosanitary measures; improvement of operating, technical and scientific capacity; management of sanitary admissibility at the international level; and strengthening of national food safety.

**Mali**

The national agency for food safety (ANSSA) has a specific mandate for *the attainment by all people of the highest possible level of health* through: assisting the Malian government in strengthening health services relating to food safety; promoting improved nutrition, sanitation and other aspects of environmental hygiene; promoting international standards for food; and assisting in developing informed public opinion among consumers on matters of food safety.

The strategy includes the following approaches:

1. Strengthening surveillance systems of foodborne diseases;
2. Improving risk assessments;
3. Developing methods for assessing the safety of the products of new technologies;
4. Enhancing the scientific participation of Mali in Codex;
5. Enhancing risk communication and advocacy;
6. Improving international and national cooperation;
7. Strengthening capacity building in Mali.

**Rwanda**

Problem-solving strategies:

1. Regulatory agencies such as Rwanda Bureau of Standards are soliciting funds from government and the donor community (particularly EU and World Bank).
2. Control whether national standards have been implemented by Rwanda Bureau of Standards through inspection and testing.
3. Formation of inspection committees from regulators such as Rwanda Bureau of Standards,

4. Establishment of SPS certification unit at Rwanda Bureau of Standards has been concluded and its operation is beginning in March 2006.

5. Rwanda Bureau of Standards has been carrying out regular training programmes at least three seminars per year, to create awareness of standards. A Standards Education Unit has been created at Rwanda Bureau of Standards to handle and organize training activities.

6. Outdated laws are being revised by concerned bodies on gradual basis.

Viet Nam

Viet Nam’s food safety policy is based on the socialization of all activities regarding food hygiene and safety, so that the leaders and government at all levels will play a role. Furthermore anticipated education and communication concerning all food quality, hygiene and safety activities are considered as “central measures”. The development of the food safety system is based on the triangle model: food act, food analysis and food inspection.” The country has identified nine steps to reach this goal: “(1) organization and management; (2) information, education, communication; (3) mobilizing intersectional activities; (4) the professional inspection of food; (5) food testing; (6) the establishment of the epidemiological system for food poisoning and foodborne diseases; (7) scientific research; (8) international cooperation; (9) appropriate investment”.

2. Food safety administration

El Salvador

El Salvador’s most widely used strategy is to request the help of international organizations and developed countries. The national government has agreements with these international organizations in different areas related to food safety, e.g. food handling, food trade, food production (manufacturing and trade).

Georgia

Georgia “found a solution for its problem of conflict of interests between the two responsible ministries in the recommendations from WHO, FAO, and other international donors (USAID etc.) how to raise administrative commitment for food safety and to determine, which governmental structure should be responsible for the risk analysis, food quality control and other issues.”

Lithuania

“All official food control activities, as well as RASFF (Rapid Alert System for Food and Feed) are executed by the State Food and Veterinary Service which belongs to the Government. This institution has local offices, laboratories and inspectors in all regions of Lithuania.”

Vanuatu

“...the Ministries of Agriculture, Health and Trade have started collaborating and making joint efforts to come to a common understanding. In the case of unsafe food the detecting Ministry alerts the other two and they then share information and resources in order to address the issue.” “I was invited in August 2005 by Codex Australia to attend a 2-day workshop to see how their systems work. This was very interesting for it showed how there is a link between the various groups such as Quarantine, Food Standards Australia New Zealand, Codex Australia, Food Industries etc. This gave us Pacific Island Countries ideas of how to set up an effective system, incorporate each group into the system, having regular consultations and continuing to provide awareness on updated issues that will or can affect them.”
A. Risk analysis

**Burundi**

The Organization for standardization and quality control of Burundi does not undertake a risk analysis, but only advertises its usage within its mandate for the promotion of quality assurance and standard setting.

**Kazakhstan**

Even though Kazakhstan mentions two ministerial departments that are carrying out risk analysis of food production, it points out that Parliament is in the process of considering a Bill *On sanitary and epidemiological well-being of the population* in line with the upcoming membership of Kazakhstan in the World Trade Organization, and according to the WTO SPS-Agreement. This Bill will regulate the general principles on providing transparency and the scientific substantiation for sanitary measures concerning production, import and export. Among others the articles of the Bill provide for the «risk analysis, assessment and management» and «rights and obligations concerning the development, manufacturing, circulation, recycling and destruction of food products».

**Mali**

Risk assessment in Mali “follows the generally accepted framework for risk assessments endorsed by the Codex Alimentarius Commission. Unlike traditional risk assessments, however, which focus on one hazard, this assessment addresses the broad range of hazards including sabotage of food, as well as hazards that accidentally are introduced into food.”

**Samoa**

In Samoa, risk analysis is not enforced by the division of the Ministry of Health mandated for food safety, but by the few food and beverage producing companies which put in place their own analysis systems for trade security reasons. The other solution that samples of unsafe food have been sent overseas for testing was timely and costly.

**Syrian Arab Republic**

The Syrian Arab Organization for Standardization and Metrology of the Syrian Arab Republic “has issued a standard on Hazard Analysis Systems and HACCP. Several parties have been granted certificates for their implementation of this system, and are registered at the Organization.”

**Zimbabwe**

“For risk analysis in terms of setting general food standards and regulations we have not undertaken any exercise. Our standards are based on FAO/WHO standards as set by Codex Alimentarius Commission and other related bodies. It is basically assumed the Codex standards are based on risk analysis studies.”

B. Food control on the different sectors of the production system

In most countries, food control is carried out in several sectors covering the whole food production (control in the primary production (animal, veterinary and plant), manufacturing/production, markets and food imports/exports). Others have marked their control points according to the product or issues of control (e.g. different responsibilities for raw/fresh foods and processed foods, animal food and food of vegetal origin, control of agriculture products up to industrial

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174 Bolivia, Colombia, Haiti, Iran (Islamic Republic of), Poland, Viet Nam.
175 El Salvador.
176 Paraguay, Zimbabwe.
level, hygiene and disease control, seeds and semen control, foods derived from plants and meat and meat products, milk and milk products). One country has assigned control responsibility to more than two entities, even if it has identified only two control steps, primary production and industry.

National food inspection is mostly carried out by several state institutions. In one country, they are distributed all over the country, as well as in large municipalities within their jurisdiction according to national standards and procedures. Then work between the different ministries/responsible institutions must be coordinated by inter-institutional committees/agencies. This was achieved by the signing of a protocol “to ensure the coherent functioning of the official control of food and the adequate coordination of activities by the competent authorities. The main objective of this protocol is delimitation of competences and responsibilities of the authorities regarding food safety in the food-chain from farm to consumer”. Another country would prefer that one national food safety agency should assume all responsibilities concerning food safety activities currently residing with other official agencies, to prevent existing coordination problems.

The institutions can also be in charge of helping stakeholders to set up a quality system or with the application of techniques. They can also “assess the various food sectors in the country and generate the respective GMP and HACCP guidelines”. “The City Councils have introduced standardized inspection forms for the grading of food premises. They have also recently developed guidelines for developing GMPs and SOPs and the Ministry of Health and Social Welfare is planning to extend this exercise to other local authorities (town councils) within the country.” “Also, a Government Decision setting up an Interministerial Committee for the analysis of the surveillance and control of the foodstuffs was just approved. The frequency of inspections and surveillance actions is established in advance, but it is easily adapted to EU requirements and to the level of risk.”

“Although there are standards in this regard, the food safety control is voluntary and is not completely supervised by the responsible institutions.” It does not suffice that a ministry is the legal competent authority, if “food safety controls are not enforced except where companies take the initiatives to put in place their own systems for trade security reasons”. These food safety programmes within the city councils are currently not coordinated under a nationwide umbrella.” Consequently food control and the distribution of respective responsibilities should be framed by regulation “which differentiates between the monitoring of the different steps from food production to consumer”. “The monitoring of the quality and safety of food is done throughout the production chain by way of sampling of food and inspections of premises. The implementation of the HACCP concept in food industries is also monitored.”

Fraud and Swindle Law “has determined the method for supervision of consumable goods especially food products through inspection on food products inconsistent with the related legislations and standards. The Ministry of Industry grants industrial production licenses provided the manufacturers achieve related Syrian national standards or international requirements.”

In specific cases, the food control system may cover the registration of food products, the issuance of quality certificates to manufactured products, the approval of processing factories, a food handler test, tests and certificates for export fish, inspection and issuance of phytosanitary certificates as well as HACCP certification of the food industry). “Limited number of food companies that has acquired HACCP, due to small size and their industrial development they are unable to meet the requirements and thus cannot qualify to receive HACCP certificate.”

Countries that have only limited resources or whose control system is not fully developed have given more attention to “high-risks foods”, “foods assigned for exportation” or “anything of plant or animal origin at its raw stage that enters or exits the country”.

C. Emergency response

The fact that an effective emergency response relies on good collaboration and coordination has been recognized in some countries. They stressed explicitly that their responsible authorities prioritize in a coordinated manner the corresponding actions. If the coordinating national institution consists of representatives of all the agencies of the government, the government promotes at the same time the actions that should be taken under given circumstances.

The Seychelles reported that “there is an emergency response system in place especially for epidemiological investigation of food poisoning outbreak among the population. The Health Department is the leading authority and coordinates the investigation and confirms causative agents. Certain process of the investigations are also regulated such obligation to notify the food related diseases. Committees and task forces are also formed during the event of national or international incidents such as the avian flu outbreak in certain parts of the world. The committees are composed of high administrative officers, technical persons, consumer representative and other private sectors.”

The emergency response system of the European Union Members or of candidates for membership is based on EC Regulation No 178/2002 (Rapid Alert System for Feed and Food). Even countries where no emergencies related to food safety have been encountered on a national scale have started to be prepared. In one country a national committee has been set up to monitor and prepare a response programme in the event of an avian flu outbreak, while in another a natural disaster management office looks at such issues with joint efforts from other appropriate sectors.

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194 Syrian Arab Republic.
195 Nigeria.
196 Syrian Arab Republic.
197 Seychelles.
198 Tunisia.
199 Vanuatu.
200 For example: Dominican Republic, Haiti, Paraguay.
201 Dominican Republic.
202 Lithuania, Poland and Romania.
203 Bhutan.
204 Vanuatu.
3. Food safety legislation

A. Food safety legislation

In order to illustrate the variety of areas covered by national food safety legislation, this section provides some country examples. In general it seems clear that the food safety legislation of these “legislatively advanced countries” does not concern all areas of food safety. Countries have first issued a basic health or food safety law with provisions for the supply of safe food and the prevention of adulteration of foods, as well as for labelling, storage and handling. Then, and in most cases in recent years, there are more specific regulations in the areas important for the national food industry and trade. This can go as far as laws or regulations that cover only a single product.

Bolivia

“At this time Bolivia does not have a food law. However food protection activities are considered under the following legal framework.

Ministry of Health and Sports (Decree Law N° 15629 of 18 July 1978 – Health Code, in its Articles 53, 55 and 56 establishes that the Health Authority will prepare, inspect and control the application of the National Food Regulation. This regulation will determine the conditions that food and beverages destined to human consumption must follow, as well as, everything related to the places that produce, divide up, deposit, distribute and sell these products. The Supreme Decree N° 05190 of 24 April 1959–Regulation of Food and Beverages, in its Article 1º implements and executes the General Regulation for the sanitary protection of Food and beverages of public consumption. This document, divided up by the Ministry of Health, consists of XXIX Chapters and 767 articles.)

Ministry of Rural and Livestock Matters, through SENASAG (law Nº 2061 of 16 March 2000, of creation of the SENASAG that in its article 2 establishes the competencies of the SENASAG and regulates the sanitary protection of the livestock and forest heritage; the certification of the health in agriculture and livestock and food safety of products for human consumption, export and import; the accreditation of people or companies, suitable for the delivery of services of health in agriculture and livestock and food safety; the control, prevention, and eradication of pests and diseases in animals and vegetables; the control and food safety guarantee, in the productive stretches and of process that correspond to the livestock sector; the control of inputs used for the livestock, agro industrial, and forest production; the declaration of public emergency in matters of health in agriculture and livestock and food safety; and the establishment of financing mechanisms for the development of the competencies of SENASAG, as well as inter institutional agreements, with public and private, national and International entities, in accordance with the Political Constitution of the State. Supreme Decree Nº 25729 that establishes the Regulation of the SENASAG, which indicates the functions, organization and operation of the SENASAG.)”

Costa Rica

General health No. 5395 (1973) (This law empowers the Ministry of Health to define national health policy and to coordinate the relative activities for public health. The law prohibits in general the altered, deteriorated, contaminated, adulterated or forged importation, preparation, use and marketing of foodstuffs. It establishes that food should be produced, handled, transported, conserved, stored, sold and provided to consumers in the hygienic and sanitary condition required by each type of action or operation in order to protect food safety; law on the use of the standards of the Codex Alimentarius (1977); animal health No. 6243 (1978) (this law establishes the Animal Health Bureau as the unit in charge of protecting the health of animals, seeking its improvement and that of its products and beneficial by-products for the human being; animal sanitary defense (1983); the registration of veterinary drugs (2000); the veterinary inspection of slaughterhouses, meat production and processing (2001)); The control of the preparation and sale (1983), the registration
and protection (1986) of animal feed; registration, use, and control of agricultural pesticides (1995); plant health protection, No. 7664 (1997/1998) (this law designates the Plant Health Service of the State the authority to enforce the sanitary protection of vegetables. Within these functions and obligations is the promotion of the international harmonization of plant health measures.); the evaluation and approval of products and/or animal by-products imported by Costa Rica (1992); the registration of imported livestock inputs and animal feed (2000); requirements for plant importation, vegetable products and other products capable of transporting pests (2001); international food trade No. 7475, 7473 (approval and execution of the Uruguay Round Agreements); competition and consumer protection, No. 7472 (this law provides the consumers’ rights to health and food safety. The Law Commission of the Ministry of Economy, Industry, and Trade has the duty to monitor that the information given the consumer is truthful and reflects the authentic nature of the products made available to the consumer).

Dominican Republic

The Dominican General Health Law contains general aspects on food safety throughout the food-chain, which remain subject to the standards laid out by the SESPAS and the Dominican Standards (NORDOM) elaborated in coordination with the General Bureau of Standards and Quality Systems (DIGENOR), created through Law 602 of 20 March 1977, which mostly are based on the standardized regulations by the National Codex Committee. Nevertheless the adoption of national standards is lacking and modern laws “need to help fulfil the SPS Agreement of WTO, since they include the application of general regulations aimed to the production of safer food for the use and consumption of humans and animals”.

Guinea-Bissau

Sanitary food control (1992); plant quarantine (1999) (provides phytosanitary measures to prevent the import and export of unhealthy plants or plant products); inspection and taxation of the hygiene of fish (2000); inspection of hygiene by the Ministry of Agriculture (2000); control of the production and commerce of iodized salt (2004); competent authority for fishery and its derivatives (2004).

Nicaragua

General Health Law; Law of Animal Health and Plant Health; Creation of the Nicaraguan Integrated System of Food Safety; sanitary meat inspection for authorized establishments.

Tunisia

“The national institute for standardization and intellectual property represents the legal framework of regulation in Tunisia. This structure, in place since 1982, shall assure the harmonization and coordination in this area. An important legal and regulative arsenal was put in place to regulate and precise the modalities of the functioning of the system, three laws and seven decrees have been adopted between 1982 and 1998.

According to the interest of the industry and the political objectives the Tunisian norms are either mandatory, i.e. registered, or voluntary norms. In both cases they can cover four issues of action: 1. fundamental norms that stipulate the vocabulary, the terminology, parameters and symbols; 2. norms of specification that set the limits of performance and characteristics of the product; 3. norms for analysis and essay to determine the requirements fixed in the norms of specification; 4. norms for organization and administration of the enterprises that concern the description of operational functions and activities. In Tunisia there are 5310 norms adopted, of which 951 are mandatory. 1217 concern food products, of which 377 are mandatory.”
Uganda

Food and Drugs Act (1964); Public Health Act (1964); Draft Food Bill (2003) (based on FAO model, covers standards and codes of Good Practice, control of pesticide residues in food, food additives, import and export of food, and warranty. Furthermore it establishes a central food control body to coordinate food control activities); The Uganda National Bureau of Standards Act 1983 (provides for formulation, implementation and enforcement of national standards in order to protect the public against harmful ingredients, dangerous components, shoddy material and poor performance. The Act also defines the national standards concerning foods as compulsory, when they affect health.); Importers of foods covered by a compulsory standard are required to receive an import clearance (Import Inspection and Clearance Regulations, 2002); The Certification Regulation (1995) (regulates the voluntary (planed to be compulsory) certification of quality systems (such as HACCP, ISO=9000), as well as permits to use a registered National Quality Mark on products conforming to Uganda Standards); The Import Inspection and Clearance Regulation (2003) (prescribes inspection of all food products before their entry to Uganda with the exception of products with a quality mark conforming to the East Africa Harmonized Standards); Water Statute (1995) (provides to promote the rational management and use of the waters of Uganda through: (i) The progressive introduction and application of appropriate Standards and Techniques for investigation, use, control, protection, Management and Administration of water resources. (ii) The Co-ordination of all public and private activities, which may influence the quality, quantity distribution, use or management of water resources. (iii) The provision of a clean, safe and sufficient supply of water for domestic purposes to all persons); Fish Act (1964); Fish (Quality Assurance) Rules (1998); Manual of Standard Operating Procedures (SOP) in Fish Industry (2000); Program for Monitoring Pesticides Residues and trace elements in water, sediment and Fish from Lake Victoria (2000); Uganda Coffee Development Authority Statute (1991) (to promote and oversee the Coffee Industry as a whole by developing research and controlling the quality and improving the marketing of coffee); Dairy Industry Act (1998); Dairy (marketing and processing of milk and milk products) Regulations (2003); External Trade Act (Amendment) Decree (1974) (empowers the Minister of Trade to use statutory instruments for the absolute prohibition of a good, or reserve exclusively for a person the import or export of any goods (including foods) or limit the import or export of any good from or to a country. Such an incident took place in the 1990’s when the Minister issued a ban on suspected radiated milk powder to enter the country); Animal Disease Act; Code of Meat Inspection (1973); Cattle Traders Act (1964).

B. National regulatory and structural strategies

Georgia

Georgia’s Parliament adopted in December 2005 a Law on food safety and quality. “Specialists from Ministries, experts from IOs and representatives of NGOs were involved in the drafting of the law. This action has raised political commitment to food safety. The law establishes an independent national food safety, veterinary and plant protection agency.”

Guinea-Bissau

Guinea-Bissau proposes “the sensibilization of the national authorities in order to create a mechanism of enforcement and review of the laws. National laws should stand under international and above regional regulations.”

Kazakhstan

“At the present time, within the framework of the law On technical regulation, a new bill On safety of food production is being worked out will be sent to the Parliament of the Republic of Kazakhstan, approximately April this year. Experts of the World Trade organization, governmental and nongovernmental organizations, associations of businessmen and others also took part in the
drafting of this project. In the process of the bill drafting the Codex, European instructions, the European Union and WTO materials were widely used. The Ministry of Industry and Trade carries out works to get national laws on standardization and certification in compliance with the WTO agreement on technical barriers in trade.”

Lithuania

“Lithuania approved a National Food and Nutrition Strategy and Action Plan for the period of 2003-2010 and thus does not observe any problems in this area. Its legislation is completely harmonized with the EU food law.”

Samoa

Samoa wants to “engage its National Codex Committee to push forward the work on a food safety law”.

Swaziland

“FAO has provided a consultant to harmonize the food legislation. A draft Food Act is currently with the Ministry of Justice ready to be piloted in Parliament. It was developed with the help of FAO through the FAO Technical Cooperation Project TCP/SWA/8922, on Strengthening Food Control in Swaziland”.

Tunisia

“In order to comply with the international food regulations Tunisia has to modernize its regulative and legislative system in this area. The detected problems with regard to a harmonization with the EU and international regulations are, the designation of a structure and responsible entities for risk assessment, the designation of competent authorities for food control in certain areas, the generalization of incoming good inspections in food businesses, the determination of food control procedures, the existence of a single text regulating chemical and industrial food products. In order to attack these problems entities from agriculture and industry have set up a collaboration mission to elaborate and/or update legal texts and decrees concerning food products and to identify with the international standard complementary texts.”

Viet Nam

The government has “the policy to amend (endorse) the division of tasks and functions of the ministries to prevent the duplication of responsibilities. FAO has organized annually the Conference on Food Control System at national level so Viet Nam could use the information and documents of the conference to set up and amend its food legislation system suitable to the circumstances”.
Annex 5
Examples of other significant achievements

Some significant achievements in the area of food safety indicated by the countries that responded to the questionnaire are listed below. They may serve as examples of how individual countries have been progressing, what kind of national food safety activities have been incited by the work of international organizations, and where persisting and hampering problems have occurred.

**Bhutan**

“The issue of food safety is fairly new in Bhutan. However, realizing its importance, the government set up the National Food Inspectorate under BAFRA where a number of food inspectors have been trained. A food analytical laboratory has been built as part of the BAFRA’s National Quality Control Laboratory and equipped with the basic analytical equipment, some of which have been procured through FAO funds.

One of the significant achievements that have been made in food safety is the export inspection system of Matsutake mushroom, Cordyceps, apples and mandarins. All the consignments are inspected in total rather than through random sampling at the site of procurement/grading. The inspection is carried round the clock rather than through fixed timings. Certificates are issued at a central place based on the field Inspectors observations. There is a mechanism of tracing back of each and every lot that is exported. Although much progress has been made in the area of food safety within a very short span of time, there is a lot more to be done.”

**Bolivia**

“The principal achievement is the promulgation of the Supreme Decree Nº 28147. This decree ends the duality of functions between the Ministry of Health and Sports and the Ministry of Rural and Livestock Matters.

Bolivia will have soon a Consolidated Sanitary Registry. This registry will guarantee the production of safe food in the companies that produce, process, import and/or divide up food and beverages in all their forms.

In addition, this Decree recognizes that there should be available a system that coordinates the activities of the Government institutions with custody in the control, supervision, surveillance, and safety of the food destined to human consumption. In order to guarantee the food safety in the food-chain, this decree recognizes the need for having a legal agreement that delimits the responsibilities and duties of every institution and the levels and mechanisms of the coordination among them. Furthermore, this decree establishes that is pertinent the demarcation of functions and competencies of the competent Official Sanitary Agencies in this matter, in order to consolidate a “System” that permits the adequate control of all the food-chain.”

**Cambodia**

“Standards for fish sauce, soy sauce and chilli sauce have been implemented along with establishing standards for drinking water. MoH inspection of hygiene restaurants is being undertaken following obtaining agreement with the Ministry of Tourism. This is important in ensuring tourism services are of high standards.”

**Costa Rica**

“Within the Ministry of Agriculture and Livestock there has been established as priority the strengthening of the services of inspection and certification of animal products and vegetable, the
strengthening of the laboratories, the training to the personnel, the drafting, and application of the 
good agricultural and livestock practices. The Ministry of Agriculture and Livestock has in 
addition collaborated in the strengthening of the courses in microbiology of food and of food 
inspection and certification in the veterinary medicine career.

The Ministry of Health has worked for the implementation of Good Manufacturing Practices, has 
strengthened the inspection in the food industry, and has carried out assessments of the food 
products of greater risk with a view to improving the preparation conditions and the conditions of 
the product that is in the market.

By the Ministry of Economy, Industry, and Trade laying the groundwork has managed to interact in 
a way coordinated with the institutions of the public sector on the existing regulations of the 
country. From this perspective the Organo of Reglametación Técnica has dictated the guidelines so 
that the emission of technical regulations in terms of food permits the effective and efficient human 
health protection, animal and plant in attachment of the defense of the legitimate objectives of the 
Agreement of Technical Barriers to the Trade.”

Dominican Republic

- “Through projects financed by the Inter American Development Bank (IADB), and the State 
Secretariat of Agriculture (SEA), there have been defined structures as the Department of Food 
Safety (DIA), for the improvement of the food and agriculture safety.
- There are ‘discussion working groups’, like the Committee of SPS and the Codex Alimentarius 
National Committee (CONCA).
- Directives and standards documents have been prepared, such as Regulations of Good 
Agricultural Practices (GAP), Reviews of the Animal and Plant Health Laws, among others.”

Ecuador

“The National Committee of Codex Alimentarius was created. The integrated system of food safety 
(SINIA) is being formed.”

El Salvador

“The laws are being revised and modernized in the area of food safety. Actually the Ministry of 
Tourism is implementing food standards for food services in tourist areas. The globalization 
includes food trade area. This is a pressure for government agencies and food producers to improve 
food safety and food quality. This is a requirement to enter in international markets.”

Georgia

During the past two years, since Georgia’s food safety activities have started, the most significant 
activities are “Georgian experts’ activities in CAC, determination of importance of food safety for 
governmental bodies and adoption of food safety law”.

“In my opinion, the new challenges, which took place in Georgia during last years, may be 
examined for those countries of post Soviet space, which are staying at the beginning of food safety 
activities. We are ready to help them to improve their food safety efforts and share them our 
experience.”

Guinea-Bissau

“Guinea-Bissau is momentarily implementing a program to fight nutritional deficiency, for example 
that salt could be used as a tool to bring the essential nutrient iodine to a family. The World Food 
Programme has realized a study on the national vulnerability concerning food safety; this 
experience could be used by other countries.”
Indonesia

“Significant achievements: GMP certification for food industry, especially SMEs; HACCP implementation for big industries. Novel and innovative solutions: Developing cold chain system in fishery handling and processing; fumigation; developing water treatment”.

Iran (Islamic Republic of)

“Food safety and quality of products have been improved via implementing HACCP systems in food industries (137 out of 6000 industries); GMP & HACCP and other workshops food issues training for official inspectors and technical supervisors in our food factories.”

Jordan

“The establishment of a risk-based system in the control of imported food. It enhances the effectiveness of the control measures by having a predetermined plan of what entries will be sampled, while not spending scarce resources on those entries which have little to no impact on the health of the consumer…”

Kazakhstan

Legislative activities have been increased since Kazakhstan is soon to join WTO. Besides the drafting of a new bill on safety of food production within the framework of the law on technical regulation, and a bill modifying and complementing the law on sanitary and epidemiological well-being of the population, “Kazakhstan conducts work regarding amendments and additions to other legislative acts, export and import of the goods in the republic and tries to get its existing laws in compliance with the international law.”

Lesotho

“Not much achievement has been realized but the drafting of modern food law can be considered significant.”

Lithuania

“There are no special innovations. The best thing - Lithuania already joined the European Union and adopted the national legislation according the EU level. What we proud - there is 12 Guides for Good Hygiene Practice for different branches of food industry have been elaborated and approved in the country. It would be important if Codex Alimentarius speed up elaboration of all standards and international codes for good practices. According to our understanding Lithuania has no special achievements that could be presented as an example for other countries.”

Mali

“The most important progress includes: The national policy of food safety, the establishment of the national agency of food safety; the conception of the national Codex team; others: 1. coordination of food inspection activities; 2. foodborne diseases monitoring; 3. training of food inspectors.”

Mongolia

“Sufficient legal environment in food safety was developed at national level. Also National Programme on Food Security, Safety and Nutrition has developed and implemented successfully. There is step by step progress towards to achieving international legislative level.”

Morocco

“The principal projects in process of realization: 1. Modernization of regulation to include the basic
food legislation principles: (i) responsibility of the operators (ii) obligation to put in place a system of self-control (traceability and HACCP) (iii) risk analysis; 2. Establishment of a national food safety agency; 3. Establishment of an independent agency for risk assessment; 4. Setting up of a national programme for the sanitary assessment of “products (microbiological, residues, contaminants...).”

“Moroccan experience that may serve as an example for others: 1. The establishment of the National Codex Committee 2. The functioning of the organs in charge of inter-ministerial coordination.”

Nicaragua

“Undertaken actions in Nicaragua to tackle the question of food safety included the development of strategies to address the lack of coordination among the entities responsible for the government in this matter, the organization of seminars directed to the industry, to the consumers and to the sector government, as well as the setting up of a legal framework to control food products from primary production, processing, internal and external trade up to the consumer.”

Paraguay

“One of the greatest achievements has been to agree to in the long run international cooperation that is supporting the strengthening of the national capability of the system of food safety. It should be emphasized that autonomous and independent institutions have been created in order to have greater response capacity, commitment, and responsibility in the field of the food safety, e.g. SENACSA y SENADEV. A technical dependency within the Ministry of Health has also been established, devoted exclusively to the Food, the National Institute of Food and Nutrition (INAN). Also it is pointed out that decentralization has started with regard to food safety through the different municipalities.”

Peru

1. “Acceptance and confidence on the part of countries as of the European Community, Asia, Latin America, etc. of our health certificates of export, based on the fulfillment of the HACCP system.
2. Outsourcing of physical, chemical, and microbiological analysis of food, beverages, and additives through the participation of the laboratories accredited by INDECOPI.
3. In accordance with our legal arrangement, it is foreseen that the outsourcing of the health surveillance in establishments of food manufacturers.
4. Autonomy at the regional and local levels so that health surveillance is carried out in a decentralized form, and coordinated due to adequate sanitary safety measures.
5. Dissemination and application of the HACCP System and the GMP as food safety instruments in the industries.”

Philippines

“The ministry has taken cognizance of the importance of food safety. We have lined up several activities to ensure the consumption of safe food.”

Papua New Guinea

The significant achievements are that we have the Food Sanitation Act (1991), National Nutrition Policy (1995), Food Security policy (2000) and Codex Policy (2003) are in placed. Also we have Standard Act & Consumer Act (2003) and currently there is a draft Food Sanitation Regulation. I think the Food Sanitation Act (1991) should go through the review process, which should identify the specific roles & responsibilities with respect to implementation of food safety to avoid duplication and gaps.
Poland
No problems and difficulties listed. Assumed reason: EU Member State and harmonization process very much advanced, even though free circulation of food and agricultural products is not yet established.

Romania
“Since the establishing of ANSVSA, Romania has undertaken integrated approach, in the field of food safety, by developing both institutional (training, employing dedicated inspectors, etc.) and the control system for the food of non-animal origin, representing a novelty for Romania.

Also, we deem the establishing of the National Committee at the middle of 2005 an extraordinary event for Romania, allowing all the stakeholders in the food field to bring the input the establishing the food standards.”

Rwanda
- “Establishment of standards body.
- Establishing of certification services for SPS, product, systems and organic farming.
- Establishing a unit in Rwanda Bureau of Standards charged with standards education services for industries and general public.”

Samoa
“Our Government acknowledges the importance of food safety through the establishment of the National Codex Committee that has been functioning since 2003. Samoa has been accorded the role of the Regional Co-ordinator for the CCNASWP twice in a row. This has not only increased our participation in Codex but also assisted in strengthening the co-ordination between Ministries in facilitating the development of food safety standards in the country. We would appreciate having our country as a case study which would help us in our current efforts to identify the weaknesses and gaps and how we can address this and move forward with our development in this area.”

Seychelles
“High level of compliance with labelling regulations by importers importing foods to Seychelles. Mass media was used to achieve this and labelling is a condition of the importers licence.”

Suriname
“People are continuously made aware to check the products before buying in order to buy also safe food. People are becoming aware of what safe food is.”

Swaziland
- Development of the draft Foodstuff Act with the help of FAO in 2001. This piece of legislation is still with the Ministry of Justice.
- Development of an Environmental health Policy and the Plan of Action with the help of WHO in 2002. However the implementation of the plan of action is being hampered by lack of funds.
- Food Safety training workshop by FAO consultants.
- Other food safety workshops have been held in collaboration with the food safety Directorate, Health Department in South Africa. Among these workshops there was one on the control of food for import and export.
- The Ministry of Health and Social Welfare has also funded a street food safety study to
determine a risk management approach to improve the safety of street foods.

- Meetings on the control of avian influenza are being held by the MOHSW in conjunction with the Ministry of Agriculture and Cooperatives.

**Syrian Arab Republic**

“The important fulfilment in the field of food safety: set up of the National Codex Contact Point (NCCP); scheme to set up General Organization for Food.”

**Tunisia**

“Today food safety and quality in a wide sense represent an economical priority in the country. A presidential decision (19 January 2006) has been taken to promulgate a food safety law in the harmonization process of the Tunisian legislation with the European legislation in this area, notably the Regulation 178/2002/EC.

In the country numerous workshops assembling international experts are being organized. Enterprises profit from substantial help to set up their quality control systems and local consultants are regularly trained in the most advanced technologies.

In this framework and as a contribution to the realization of an electoral presidential programme, a programme promoting food quality was started in April 2005 by the Ministry of Industry, Energy and Small and Medium Enterprises. This programme has two objectives, the certification of 600 enterprises in 3 years (2005-2009), of which 105 enterprises are relevant for the agro-alimentary industry, and the development of national competences to set up different management systems.

Tunisia has encouraged the evolution of food safety management systems towards the international standard ISO 22000. Tunisia has immediately adopted ISO 22000 as the Tunisian standard NT46.06 (2005).”

**Uganda**

“Development of the National Food Safety Strategic Plan. Because of the EU regulation no. 178/2002, into force since 1st January 2005, traceability has become mandatory and therefore a market access requirement for the food products of Uganda targeting the EU market. As “a challenge” the EU regulation requires that the Government and the food business operators “have to face together to consolidate the market shares gained by the Uganda products. It is also an opportunity to strengthen the competitiveness in the export market and a challenge for the upgrading the national industry and the modernization of the national economy. This is again another opportunity to strengthen the Uganda food safety system, upgrade and harmonize the Uganda hygiene standards at regional and international levels.

It is important that a national task force composed of key Government and private sector institutions facilitating export development be set up to review the technical deficiencies within the different sub-sectors (sub-sector approach) and draw up a National Action Plans for addressing such issues. It is against the Action Plans that progress for realization of improved quality of exports can be measured and access to the EU market for horticultural products and honey will be obtained. A similar approach was used in the Fish Industry in 1997 after the first EU mission to Uganda. UNIDO will provide the technical guidance for faster replication of the fish model in the priority sub sectors (honey, fruits and vegetables) and strengthening of the food safety system.

The National Food Safety Strategic Plan (NFSSP) and the Food Safety Bill developed with UNIDO assistance should be urgently reviewed. The NSSP should be launched and the Food Safety Bill enacted. In order to minimize on costs, the mandate of the National Drug Authority can be
extended to include food control. Government may request UNIDO, FAO and WHO to complete this process.”

**Vanuatu**

“Vanuatu has tightened up the legislation and will use the knowledge and skills of the National Codex Committee which consists of a handful of technical people from the various government institutions to speed up and enhance certain procedures that are out dated.”

“The significant achievements have been mentioned throughout the questionnaire but one that I have missed out is the awareness of the National Codex Committee and its link with other necessary bodies such as the WHO liaison officer in Vanuatu, FAO national correspondent, Australian Embassy, French Embassy, etc. These organizations are kept informed of codex work at a national level. The committee has also appointed 2 new members to the committee and initiated 3 sub-committees which are of priority to the country.” “The National Codex Committee has become the main driving force of food safety and is slowly progressing to increase the knowledge of higher ranking officers of the government to emphasize the importance of this area and make it one of its priority areas in future.”

**Viet Nam**

“At present, we are preparing to submit to the Viet Nam Government for approval a Standardization Law and Provision on Goods Labelling. It will be adopted at the end of this year. And we continue to prepare the draft of a Quality Law. These legislative requirements will contribute to control and strengthen the food safety system at national level.”

**Zambia**

“The introduction of a pilot project on improvements of Nutrition and Food Hygiene in informally vended foods in the urban markets. The Committees have been formed, involving vendors, health inspectors and other stakeholders. We need support so that the project could be scaled up to other markets and Districts.”

**Zimbabwe**

“Briefly there has been
1. Review and update of legislation leading to the establishment of the Food Standards Advisory Board (Strengthening Food Legislation in Zimbabwe, FAO project 1985)
2. Drafting of the Food Safety Control Bill now at Attorney General’s office for redrafting presentation to Parliament. This will establish the Food Safety Control Authority to be responsible for food safety coordinating and the present structures and programmes and bringing together all stakeholders. Zimbabwe will need the assistance from International Organizations for this.
3. With regard to Codex Alimentarius activities
   b. Zimbabwe (DB Nhari) was Vice Chair of Codex Alimentarius Commission for two terms (1999 to 2004)”
Annex 6
Examples of international help requested

1. Food safety policy
Countries suggested the following actions for international organizations in order to help and contribute to the establishment of a national food safety policy.

International organizations can help to raise political commitment to food safety:
- by sending their senior officials to visit the country, holding international meetings targeting high-level government officials and interacting with the political leadership to raise awareness and emphasize the importance of food safety at the highest level;
- by regular communication with high-level government officials on the formulation and implementation of food safety policy programmes;
- by stressing the link between food safety and food security at international fora where decision-makers participate (e.g. the World Health Assembly) and by incorporating food safety issues on the agenda of such fora; further ratification of protocols;
- by providing information and awareness-raising campaigns (also for consumers) through \textit{inter alia} the dissemination of pamphlets and posters;
- by external audits that guide the countries to adequate policies for the improvement of food safety;
- by implementing programmes (e.g. on the basis of external audits regarding the specific country’s food safety situation, or in general regarding necessary infrastructure facilities to accommodate effective and efficient food risk analysis) in collaboration with national governments to develop food safety policies.

The international organizations might collaborate by providing:
- training for personnel or local staff involved in the food-chain and in inspection;
- technical equipment and laboratory facilities for food control systems;
- help to implement a national food safety policy by regulations, food standards, control and analysis systems, as well as a food safety plan of action;
- provision of guidelines, standards and codes of practice to adopt, even addressing more specific fields, such as chemical and biological threats;
- help to mobilize internal and external funds to achieve food safety activities;
- courses for those responsible for establishing or recommending a food safety policy as well as seminars on a frequent basis or as follow-up projects, and courses in emerging subjects such as traceability, animal welfare, electronic certification, quality management of services.

2. Food safety administration
Countries suggested that international help (training, projects, consultancy, financial help, technical assistance) should be extended in the following areas:
- Training of food inspectors, laboratory personnel and responsible entities, especially in the areas of risk analysis and rapid alert systems, as well as concerning the inspection of imports and market surveillance; initiation of monitoring MRLs of pesticides and veterinary drug residues in food.
- Public education and awareness activities (“sensitization of the need to strengthen and sustain a risk and management assessment through an information system and operational actions to respond to emergencies”, organization of a stakeholder conference that might raise awareness and “can highlight that food safety needs collaborative actions by the government”; “the provision of technical assistance/training and the presence of the
authorities of international organizations is important to raise its importance at national level and thus to manage an increase of the administrative commitment”).

- Establishment and improvement of laboratory equipment and infrastructure facilities (“more sophisticated laboratory equipments are required capable of detecting harmful things as pesticide residues and heavy metals”, “to improve the organization of risk analysis, food control and emergency response”).
- Implementation and finalization of legislation (“enforcement and implementation of standards”, “effective food law and regulations, power to implement the law and other effective solutions”, “access to international technical standardization in a timely manner”).
- Elaboration of a national policy and strategy on food safety (“develop regulations and policy guidelines to make the new legislation operational”).
- Reinforcement of the responsible national administrative institutions or Codex offices (“assignment of clear responsibilities”, “based on successful models in other parts of the world”, “development of an emergency plan”).
- Cooperation and active participation of all stakeholders (“government, industries, consumers”).
- Funding for activities and infrastructure (“on the understanding of sustainability by the government”).

3. Food safety legislation
Countries suggested that international organizations might provide help in the following areas:

- Technical support for setting up and drafting food safety legislation and national food standards (“and limits of environmental contaminants, additives etc.”) with the help of (“reference with international regulations and legislation of other countries”, “make available copies of similar legislation or a template that may be of use to develop initial draft”, “support in the contracting of consultants specialized in the subject for the development of standards”, “provide information related to international legislation”, “distributing the latest developments on legislation, so that the possibility exists that these regulations can be implemented in the national law”).
- Support in the enforcement of food safety legislation (“the aim is to make the country able to assure the application of the legislation”).
- Comprehensive analysis, review and update of national food safety legislation (“in order to strengthen the existing databases in the country”).
- Funding of special projects and activities for the improvement and strengthening of legislative acts and legislation (“promote actively and with resources the groups of experts who support the international standardization, so that they evaluate impartially the technical support of some national regulations”, “for publication and dissemination of standards through the National Codex Committee”).
- Creating the necessary awareness among the public and responsible entities (“disseminate widely the [list of] products or additives and contaminants that definitively are detrimental to the health of the consumers”, “lobbying to raise administrative commitment to food safety”).
- Capacity building, training and financial help for the responsible entities (“so that the less developed countries can participate actively in the international standardization agencies and in the forums for debate or monitoring of the international agreements related to the standardization on food safety”, “to manage and administer as well as to undertake food safety assessment, analysis and management”, “areas such as: inspection and registration of food additives, registration of the food pre-cuts originated from genetically modified animals and plants, biologically active food additives”, “support the control system by way of logistics, such as transport and laboratory infrastructure”).

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4. *Codex Alimentarius*

The suggestions of individual countries concerning the ways that international organizations might help to improve the use of the *Codex Alimentarius* at national level were quite numerous:

- Most countries emphasized the need to enable the participation of country representatives (and even to increase the size of the national delegation) at national, regional and international Codex meetings, in line with the objective of the Codex Trust Fund (strengthening national food control systems through enhanced participation in the Codex process).

- Strengthening participation at Codex meetings through the review and evaluation of the activities of the national Codex committees (“The NCC membership has been reviewed based on the recommendations made during the FAO/WHO training course”, “international organizations can circulate a note to the higher ranks of the government and seek information of the national inputs of the work of *Codex Alimentarius*. They can further enquire why the country is a member to the organization, what does the country hope to achieve from this organization and what are the achievements so far if any”).

- Assistance to the national Codex committee to run awareness programmes to increase the knowledge of the public and private sector in general (“design of publications”, “to strengthen and set up national Codex committees and Codex contact points with the necessary infrastructure for functioning communication”).

- Training workshops and consultancy for the responsible national officers concerning the Codex process and for the industry on food safety issues (GMP, HACCP, etc.) to raise awareness.

- Publication and circulation of general and updated information on Codex matters and decisions (“booklets on topics of importance similar to those on hygiene texts, organic foods would be useful”, “to be consistent with the rest of the globe. Speaking from my experience, information is picked up when attending meetings but then you are restricted to the accepted weight of the luggage. Thus it is really important to mail or circulate copies of updated versions to other countries and not wait for the individual to pick up at meetings for some of these texts are heavy.”).

- Support to equip countries with facilities for analysis and laboratories, help to utilize regional laboratory facilities or to provide safety and quality analysis in the case of absence of national experts (“financing research projects related to food consumption of the national population in order to have a scientific database that could be used when elaborating national standards related to food fortification and MRL etc.”).

- Technical assistance to elaborate national norms and standards based on the Codex Alimentarius.

- Items of national and regional interest countries find to be absent from Codex Alimentarius include “yak meat, red rice and fungus Cordyceps”,205 “beer, soft drinks (carbonated) and some indigenous products e.g. melon, pepper”206 “quinoa and the amaranto, Andean products of great nutritional value and that are having greater acceptability in the international trade”,207 “root tuber “igname”, egg-plants, passion fruit”,208 “soumbala and cotton seed oil”,209 “banana wine standards, sorghum wine, passion fruit juice concentrate”.210 In preparation and of a national interest are the Codex standards for the “dull herb and the stevia rebaudiana bertoni”211 and the “bitter cassava”.212

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205 Bhutan.
206 Nigeria.
207 Bolivia.
208 Haiti.
209 Mali.
210 Rwanda.
211 Paraguay.
212 Vanuatu.
5. Involvement of other stakeholders

International help was requested in the forms of:

- Organization of workshops and training programmes for the involved stakeholders (“especially for SMEs”, “organization of national events”).
- Information and orientation in Codex matters to raise awareness of its importance (“to strengthen and improve the food legislation system”, “to involve NGOs and other relevant food agencies from food industries and consumers to understand the importance of food safety policy and the role of Codex in domestic and international food trade”).
- “Build technical capacity of food industries by providing food safety facilities such as laboratory, inspections”.
- Technical guidance on the main strategies for action and organizational structure for stakeholders (“the international organizations could obtain the references of other international organizations of consumers in order to improve the efficiency of the national ones”).
- Financial support (“destined to raise the awareness of consumers concerning the handling and purchasing of food”, “for the implementation of their programmes”, “help industries to participate in international standards development”).