

PROCEEDINGS OF THE FSN FORUM DISCUSSION No. 39  
**DEVELOPING AND IMPLEMENTING FOOD SAFETY MECHANISMS**  
FROM 30 JUNE TO 23 JULY 2009

Summary available at  
[http://km.fao.org/fileadmin/user\\_upload/fsn/docs/SUMMARY\\_Food\\_Safety\\_Mechanisms.doc](http://km.fao.org/fileadmin/user_upload/fsn/docs/SUMMARY_Food_Safety_Mechanisms.doc)

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## **I. GENERAL INFORMATION**

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Duration:	from 30.06.09 to 23.07.09
Number of participants:	20
Number of Contributions:	21

## II. INTRODUCTION OF THE TOPIC

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Dear Forum Members,

We are Harun K.M. Yusuf and Lalita Bhattacharjee, working for the last three years as Nutritionists on the National Food Policy Capacity Strengthening Programme (NFPCSP) implemented by FAO in collaboration with the Food Planning and Monitoring Unit (FPMU), Ministry of Food and Disaster Management, Bangladesh. The overarching goal of the NFP is to 'ensure a dependable food security system for all people at all times', the term food security here encompasses all dimensions – availability, economic, social and physical access and utilization/nutrition. Food safety is one of the priority issues in the NFP strategic framework.

Food safety is a major public health concern in Bangladesh, as probably also in many other developing countries. Food growers, particularly fruits and vegetable growers resort to unscrupulous use of pesticides and insecticides, the wholesalers and retailers use artificial, toxic colourants, ripening agents and preservatives, and the food handlers at large do not have adequate knowledge nor attitude on hygienic and sanitary aspects of food handling, preparation and service. The helpless consumers who are at the receiving end face risks of consuming heavily contaminated food. In the absence of any effective control system, the food twisters are so rampant that sometimes it seems that it would be impossible to find a single food item in the market which is not contaminated or adulterated. Unaware of the rampant use of toxic substances, the consumers continue to buy and eat foods. In most cases the consumers are not even aware of the potential dangers of food adulteration and contamination. While the development of the marketing system of the rapidly growing processed foods and other foods is important, maintaining quality of all foods at levels of marketing (assembling, cleaning, sorting, processing and packaging) is a key concern and challenge.

The above are some of the challenges that face Bangladesh and possibly other developing countries. This warrants the need for developing/strengthening the implementation of a comprehensive national system for enhancing food safety, quality and food control. Priority needs to be given to the assessment and prevention of risks involved in the distribution of safe food along the entire chain from production to consumption.

We would like FSN Forum members to highlight from their country experiences:

How are the basic issues and challenges of food safety being addressed and mechanisms implemented in overcoming these?

Some specific questions include:

- 1) **How are the legislation on food hygiene and HACCP systems implemented in your country?**
- 2) **How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**
- 3) **What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**
- 4) **What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

In requesting your responses, we would like to review the comparative situation and distil the best practices and pick up key policy lessons for strengthening implementation in our situation.

We thank you in advance for your suggestions and ideas.

Harun K.M. Yusuf and  
Lalita Bhattacharjee  
National Food Policy Capacity Strengthening Programme  
Food and Agriculture Organization of the United Nations  
Bangladesh

### III. LIST OF CONTRIBUTIONS

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#### **Contribution by Per R. Hansen from the Danish Veterinary and Food Administration (DVFA), Denmark**

Dear all,

First of all I would recommend you to visit the English homepage of the Danish Veterinary and Food Administration (DVFA) <http://www.uk.foedevarestyrelsen.dk/forside.htm> . DVFA is responsible for food safety and health from farm to fork in Denmark. The web-site provides a good description of Danish Food Safety mechanism and will give answer to most of your questions (especially see under "Inspections" - The monitoring of Food, <http://www.uk.foedevarestyrelsen.dk/Inspection/forside.htm> )

Some information from the site is included below for easy reading:

The Danish Food safety mechanism is based on the own-check principle. The companies and producers must have so-called self-inspection programmes with systematic action plans to ensure that regulations are observed in the handling of food products and livestock. The governmental food authorities inspect that the relevant regulations are observed. The self-inspection programme must be organised in accordance with the principles embodied in the HACCP system. The food industry has been urged to compile so-called "industry codes for good hygienic practice". Under this, the food industry will itself produce proposals for ways in which companies can be organised and run in a hygienically responsible way and can implement efficient self-inspection programmes. The self-inspection programme should be adapted to accommodate individual companies.

Danish consumers have Smileys to help them choose where to shop for food or dine. The Smiley-scheme has, since its launch in 2001, become highly popular among Danish consumers as well as the enterprises, and has proved effective in raising food safety. The Smileys appear at the top of the official food inspection reports. The report must be displayed so consumers can read from the outside – before deciding to enter a shop or a restaurant. With a 99,8% high consumer-awareness the Smiley scheme is one of the best-known public schemes in Denmark. The newly introduced elite-smiley is awarded to the enterprises best to comply with the rules and regulations (Smileys keep Food Safety high in Denmark  
<http://www.uk.foedevarestyrelsen.dk/Inspection/Smiley/forside.htm>

Regarding the legislation, all 27 member states inside the EU have the same legislation on Food (since 1st January 2006):

- Regulation (EC) 178/2002 General Food law (went into force 1st January 2005). There is a guidance document to certain articles in this document.
- Regulation (EC) 852/2004 on the hygiene of foodstuffs. There is a HACCP guidance document in relation to article 5 in this regulation.
- Regulation (EC) 853/2004 laying down specific hygiene rules for food of animal origin. There is a guidance document to this document.
- Regulation (EC) 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption.
- Regulation (EC) 882/2004 Official Feed and Food Controls Regulation.

You can easy Google these on the internet on several languages e.g. English, French, German etc.

Also you can pick up the legislation (pdf file) on our English colleagues homepage <http://www.food.gov.uk/foodindustry/regulation/europeleg/eufoodhygieneleg/>

Yours sincerely

Per R. Hansen  
Control Coordinate Division

**Contribution by DSK Rao from India**

Dear all,

Mr. Yusuf has initiated a very interesting subject. It may be noted that man was consuming food from ages and has survived till date. With the so called modern scientific interventions like harmful pesticides for pest control instead of natural predators ... residual poisons started entering our food chain. Nature has its own natural ways of indicating what is not fit for consumption by way of bad odor, taste, color etc when the foods are in their natural forms. Not only man but 64 lakh species are instinctively tuned to select their foods. Most of the problems are arising with short sighted interventions in the natural systems by adding harmful preservatives or pesticides or prescribing some 'Food Standard Measures' not in tune with nature.

I have seen thousands of people enjoying various freshly made snacks at the roadside stalls in India, (definitely similar scenes must be there in every country) which as per Food Safety Standards are not safe. These people do not have problems after eating these freshly prepared foods.

However, I know several people who eat in 5 star hotels which have Food & Nutrition Certification for the foods they serve, but have fallen sick as the foods were not fresh but preserved with preservatives and ecoli presence!

Similarly, many of my friends who have let their immune systems become weak by confining to drinking mineral water and spending most of their time in dust free air-conditioned environments, fall ill when they eat or drink or come out in dusty environment.

I feel we should understand to live with nature and be careful in prescribing Food Safety Standards without fully knowing the implications.

Best Regards,

DSK Rao  
Global IT & Innovation Consultant,  
Hyderabad, India

**Contribution by KV Peter from the World Noni Research Foundation, India**

Dear all,

Standards and specifications for ensuring food safety are desirable. Food essentially means a product of ingredients, water and the vessels used in cooking the food and of course the health and hygiene of cooks. Good Agricultural Practices of Agricultural crops, quality of oils used, standards of spices and condiments and above all quality of water. Cleanliness of plates and glasses is to be emphasised. Waste disposal and processing to manures and methane gases are to be a major aspect of food safety. Labelling of packed food has already been taken care. Please remember that food is thy medicine -Hippocrates.

**Contribution by Rekha Sinha from International Life Sciences Institute (ILSI), India**

**1) How are the legislation on food hygiene and HACCP systems implemented in your country?**

Indian regulations lay down the conditions for food hygiene. A number of legislation governed the food sector including cereals, fruits and vegetables, marine, meat and edible oils. They laid down specifications which were mandatory to be followed and non implementation attracted punishment and penalties. These legislation have now been replaced by Food Safety and Standards Act. Food Safety Authority has been set up, please see [www.fssai.gov.in](http://www.fssai.gov.in). The Bureau of Indian Standards (BIS) has also laid down specifications which are voluntary. The BIS has specified limits for microbiological parameters for processed foods in respective Indian standards, has also formulated standards on test methods for detection and enumeration of pathogenic microorganisms in food. BIS has also developed code of hygienic conditions for various food industries and has adopted CODEX HACCP and Food hygiene Guidelines as Indian standards.

As regards implementation, the food inspectors check whether industry is complying with mandatory regulations. BIS inspectors carry on checks only if someone has taken BIS certificate.

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

The Central Committee for Food Standards along with a number of sub committees on specific subjects under Ministry of Health and Family Welfare give approvals for and oversee the overall implementation of major India regulation on foods i.e. Prevention of Food Adulteration Act and Rules. (However, there will be changes in this system with the setting up of Food Safety and Standards Authority). The monitoring mechanism has been laid down under the PFA Act and Rules (Please visit [www.mohfw.nic.in](http://www.mohfw.nic.in)). Under this legislation, Government of India has set up food testing laboratories known as Public Analyst (PAs) Laboratories in each State. Then there are Central Food Testing Laboratories (4). Food inspectors pick samples and send these samples to PAs and to CFLs. If the samples fail prosecution is launched. In addition Government also has several programs like All India Coordinated Program on Pesticide Residues. Further, from time to time Government institutes like Central Food Technology Research Institute, Indian Institute of Toxicology Research, Indian Council of Medical Research, National Environment and Engineering Research Institute, Rajiv Gandhi Drinking Water Mission under Ministry of Rural Development, Ministry of Urban Development and Ministry of Water Resources conduct surveys on food and, water safety. Export of fishery and marine products is monitored by Export Inspection Agency.

Parameters have been laid down for chemical contaminants and microbiological contaminants under Prevention of Food Adulteration Act, Fruit Products Control Order, Meat and Meat Products Control Order etc which now come under Food Safety and Standards Act. In addition specifications have been laid down for food additives. The labels also need to declare food ingredients.

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

The Government of India realized the problems relating to multiplicity of agencies and difficulties in coordination. That is why Food Safety and Standards Authority has been set up which will be

the main regulatory body in the country for setting up an effective surveillance mechanism, developing regulations and ensuring safe food.

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

Ministry of Consumer Affairs, Food and Public Distribution looks after consumer welfare. Consumer Protection Act protects rights of consumers. The Central Consumer Protection Council under Ministry of Consumer Affairs consists of consumer representatives, Central and State Government representatives and industry representatives to look into consumer related issues. Consumer Courts have been up at District, State and National levels to redress consumer grievances. Consumers have been given the power to pick samples according to the procedures laid down. The Ministry of Consumer Affairs prepares IEC materials and also runs campaigns through media. Consumer representatives are taken on all policy making bodies such as Food Safety and Standards Authority, Bureau of Indian Standards and Weights and Measures (Packaged Commodities) Rules.

**5) Is the street food vending system institutionalized in your country? How was this achieved?  
What is the extent of women's involvement in street food vending?**

Street foods are very popular. However, it is not yet institutionalized in the country in the sense that Government does not provide specific space, infrastructure and does not implement any program like making it mandatory to use uniform, gloves etc. Ministry of Food Processing Industries is now starting some programs on pilot basis. Women's involvement is limited.

Rekha Sinha  
Executive Director  
ILSI, India  
<http://www.ils-i-india.org/>

**Contribution by Subhash Mehta from the Devarao Shivaram Trust, India**

Safety (accepted levels of pesticide and heavy metal residues) must begin with good agriculture practices (GAP) being strictly enforced, especially in developing countries where about 70% of the population is agrarian as against about 1% in the developed world.

90% of these 70% are small farm holders who are mostly illiterate and follow the package of practices generated by NARS and in their research institutes. This does not work on these small farmer fields as the farmers face serious pest and productivity problems after being given wrong advice by the local external input suppliers who are only interested in getting rid of their slow moving stocks or where the manufacturer is offering a higher profit margin. The farmers, ill advised by the local trader, apply quantities many times more than the recommended number of sprays, resulting in harvested produce having pesticide residues many times higher than the acceptable GAP levels.

The solution lies in following the organic farming system knowledge of the area, with in house farm labour, production of seed and planting material, low cost on farm production of soil and plant protection formulations which will provide nutritious food to meet their own needs and also ensure health security.

Subhash  
Devarao Shivaram Trust

Mehta,

Note

Useful website:

Good Agriculture Practices [http://www.fao.org/prods/gap/index\\_en.htm](http://www.fao.org/prods/gap/index_en.htm)



**Contribution by Purna Chandra Wasti from Emergency Rehabilitation and Coordination Unit, Nepal**

Dear Colleagues,

It's a very interesting topic and most pressing need of the world (especially the developing world) floated by two colleagues (Harun K.M. Yusuf Lalita Bhattacharjee) from Bangladesh.

Although, I don't have any specific example to share; I am just sharing my insights. Here is my response:

**1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

Food legislation before, was a general one. Now, after the emerging worldwide food safety issues, we have realized to incorporate the principles of HACCP. Some countries (as shared here by other colleagues) such as EU has made HACCP a mandatory component of its legislation. While appreciating the importance and effectiveness in utilizing the scarce resources, the HACCP based systems are more suitable for the developing countries like us. The government has a very important role to play in promoting the HACCP system. First some of the very risk areas (such as milk, water and others) should be made mandatory (not the HACCP as such but the HACCP based).

Otherwise, first the GHP (Good Hygienic Practices) and GMP (Good Manufacturing Practices) should be promoted, made mandatory for some priority sectors, then step by step jump to HACCP.

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

We have market inspection, industry inspection as well as import inspection so that the safety is ensured. Actually it's very difficult to set the monitoring indicators to determine the effectiveness of the implemented programmes. Actually, the survey with random sampling for the food safety and quality indicators, should be conducted periodically. However some of the proxy indicators such as food borne diseases, consumer confidence. This is the really grey area in our context. We have yet to establish system for this.

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

Yes, I agree. Here in Nepal food safety and quality monitoring system is under the Ministry of Agriculture and Cooperatives, while the epidemiological data can be obtained from the Ministry of Health and Population. Even the coordination among the different departments (Department of Agriculture, Department of Livestock Services) is very difficult. The coordination with other sectors is very difficult. In the mean time, some issues such as avian influenza has brought some of the sectors (such as health and agriculture) together. Here, the ideal situation should be the integrated biosafety approach with integrated legislation as well as monitoring mechanism.

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

Well, here in Nepal consumer groups are quite active and they are really drowned in the general issues such as weights and measures as well as other minor economic malpractices. We can make a good use of active consumers with certain joint activities of consumer awareness.

However, due to the budgetary practices of the government, it is virtually impossible. There is a need of unified efforts of all consumer groups and formation of consumer clubs and flow the education materials in addition to the regular media campaigns.

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

This is the most neglected area and we are in the process of inception to improve the technology as well as hygienic practice of the vendors and institutionalize this sector with certain hygienic as well as other standards and provide sufficient authority to local government units (municipalities).

There are other burning issues such as pesticide residues and veterinary drug residues, where there is a need of joint effort of agriculture/livestock as well as food safety and quality sector.

Another area is the hotel and restaurant sector, which needs to be regulated with certain mandatory facilities and hygienic standards. This sector should also be brought under the jurisdiction of local government with the technical backstopping from central government agencies.

So far, our legislation is based on the inspection and testing of food product sold in the market. Now, we have realized to move to the system inspection plus product testing. The effectiveness of Food Safety and Quality Control Programmes in the developing countries like ours depends upon our capacities to monitor effectively along the flow of food from the farm to industry to wholesale to retail, the safety and quality system adapted in the manufacturing industries ( with adequate responsibility), coordinated efforts ( both government as well as non-government sectors), accredited laboratories to produce reliable results, appropriately prioritization of the sector with comprehensive food safety and quality policy and the effective consumer education through various media including their own participation through consumer clubs.

In conclusion, food safety and quality sector has a very important role to play as a sub-component of food security as well as partly as a public health sub-sector.

So, I team up with our Bangladeshi colleagues to advocate for the strengthening of this sector to the governments and the UN agencies like FAO, WHO to give adequate priority to this sector.

Cheers!

P.C. Wasti  
National Nutrition Consultant  
Food and Agriculture Organization of the United Nations (FAO) Emergency Rehabilitation and Coordination Unit Pulchowk  
Lalitpur, Nepal

**Contribution by Neha Singhal from the Indian Council of Medical Research, India**

Dear Members of the forum,

Food Safety is the basic requirement for public health. In recognition of the need to modernise the Food Control System, the Indian Parliament passed the Food Safety and Standards Act in 2005. The Act envisaged the establishment of the Food Safety and Standards Authority of India. Some of the aims of Food Authority are:

- Set standards and limits for contaminants
- Prescribe labelling requirements
- Indicate methods of analysis
- Set out guidelines for accreditation of laboratories

- Conduct surveys

Safety of fats and oils used for cooking

Vanaspati fat is obtained from partially hydrogenated vegetable oil (PHVO) and is extensively used in Indian cooking for manufacture of commercially fried, packaged, processed and bakery products. It contains high amounts of atherogenic trans-fatty acids (TFA). Most of the road-side dhabas, street vendors, halwais use this fat as it is cheap and does not become rancid. The WHO (2003) recommended that the TFA consumption should be less than 1% of total daily energy intake.

In September 2008, Government of India, under the Prevention of Food and Adulteration Act issued notification for labelling of food. This notification includes for the first time labelling for nutrition and health claims.

The Indian government is getting ready with a plan for "Safe Food, Tasty Food" project in Delhi during the Commonwealth Games in 2010.

Food hawkers in India are generally unaware of food regulations and lack services such as adequate quality of water supply and waste disposal systems, which hamper their ability to provide safe food. According to the provision of Code for Hygienic Conditions for Food Hawkers (Bureau of Indian Standards, 1984), all the hawkers shall be inoculated and vaccinated against the entire group of diseases as prescribed by the concerned health authorities and a necessary certificate in this respect should be always available with him for inspections. However, it is hardly seen implemented by street hawkers in India.

Thus the following are the gaps identified:

1. Ineffective implementation of the laws passed by the government
  2. Lack of consumer awareness and demand on food safety
  3. Lack of personnel with appropriate technical qualifications and expertise
  4. Lack of well equipped central laboratories for food analysis
- It is important that the above issues on Food Safety are actively pursued.

With regards,

Neha Singhal  
PhD Scholar (University of Delhi)  
Research Fellow  
Indian Council of Medical Research  
New Delhi  
India

### **Contribution by Vanessa De Klerk from The Food Safety Network team, South Africa**

Good day dear Forum Members,

#### **1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

South Africa is a member of Codex.

The National Health ministry is responsible for developing legislation related to food hygiene and HACCP.

We have a regulation, regulation 918 of the Health Act, governing the hygiene requirements for food premises which addresses basic GMP's such as pest control, personnel hygiene etc. This is

supposed to be enforced by local government at municipal level by the environmental health practitioners.

There is only one mandated food sector for HACCP and that is the ground nut sector. This is a recent development and EHP's are required to verify the implementation of a certified HACCP system. This is in terms of regulation 908 of the Foodstuffs, cosmetics and disinfectants act.

The department of agriculture have developed the meat safety act which addresses the first 5 principles of HACCP for the meat and poultry industry. The provincial government enforce this at abattoir level. This act and its regulation also defines the minimum hygiene requirements. The abattoirs are subjected to hygiene assessments similar to that used in the UK.

For more information please visit <http://www.doh@gov.za/> and [www.nda.agric@gov.za](http://www.nda.agric@gov.za)

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

At this stage it is based purely on compliance with the regulations. Food samples should be taken to ensure compliance with the Foodstuffs Act but this is not done as effectively as it should be. If micro surveys are conducted this information is not published outside of the ministry sometimes even the province. We do not have an effective system for food borne illness statistics. The only foodborne pathogens monitored are Brucella and Salmonella and this information is taken from the confirmed samples submitted to the National Health Laboratory services.

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

There are few formal channels.

The DOH runs a food legislation advisory group (FLAG) which has representation from all stakeholders.

There is an organization Southern African association of Food science and technology which holds annual conferences.

Most sectors have an association such as the South African chamber of Milling, the red meat abattoir association, the South African Poultry association, etc.

There is an organisation called the Food safety initiative which services its members which are largely retailers and larger producers in the country.

We have the same need - no one wants to talk about things...

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

We have recently had the Consumer protection act promulgated. This provides the consumer with many more rights regarding food safety amongst other things. The act makes provision for consumer councils that will assist the consumer with prosecution.

There are a number of consumer organisations such as the National consumer forum, the South African consumer union, Food advisory consumer service(FACS). Formal Consumer involvement in food safety is a relatively new development.

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

As far as I am aware there is not an association of street vendors if that's what you mean. The regulation relating to premises (R918) previously mentioned is applicable to street vendors too. Its enforcement relies on the local authorities. There have been several publications coming out of South Africa relating to micro surveys done on street vended foods. I would say the majority of vendors are women although this is my observation not a national statistic/

Feel free to ask for more detail if necessary.

Kind regards

Vanessa De Klerk  
The Food Safety Network  
(<http://www.thefoodsafetynetwork.co.za/>)

### **Contribution by Harun Yusuf and Lalita Bhattacharjee from FAO, Bangladesh**

Dear Colleagues,

We are indeed encouraged by your valuable responses and note that we share common concerns in the region.

It appears that the priority need is a well drawn up 'Food Safety Policy' that is comprehensive and evokes national commitment and ownership of the policy implementers from various sectors. This is imperative given that self sufficiency being attained in food and with sectoral surpluses emerging from food production, food processing and trade have become very important. On the other hand, assuring basic food safety for the consumer is increasingly a challenge.

Clear mechanism, structures and institutional arrangements for implementing food safety plans of action and activities need to be established as part of policy implementation.

We look forward to your inputs/suggestions.

Harun Yusuf  
Lalita Bhattacharjee

### **Contribution by Keya Chatterjee from India**

Dear All,

The topic of food safety is so relevant in today's context. While it is easy to point to the unorganised sector on failure to maintain adequate standards, the assurances of organised sectors also do not seem adequate. Take for instance the milk contaminations uncovered in the recent past. We have no way of knowing if the milk supplied by the organised dairies are adhering to quality standards, and that the packeted milk that is delivered at our doorsteps is not contaminated.

It would be very useful if the discussion also throws light on how a common man will get to know if he is getting safe food items.

The Danish experiment was interesting, maybe we need something of that sort in India also.

Keya Chatterjee

**Contribution by Stella A. Denloye, from the National Agency for Food and Drugs Administration and Control (NAFDAC), Nigeria**

Dear all,

Please find below my comments on the questions.

**1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

Implementation is by the three tiers of government: federal, state and local government. The Federal Ministry of Health is responsible for formulating the national policy on Food Hygiene and Safety (under the Nigerian National Health Policy) and control of food borne disease, as well as other national and international matters relating to food.

The National Agency for Food and Drug Administration and Control (NAFDAC), a parastatal under the Federal Ministry of Health is responsible for the regulation and control of food at the Federal and State levels of government. NAFDAC formulates guidelines and regulations on food hygiene and safety as well as monitoring of implementation. It is also responsible for implementing nutritive value of food, food hygiene and safety standards. NAFDAC does this through inspection of manufacturing outfits for GMP compliance and has commenced HACCP inspection for dairy, seafood, water and drinks production. NAFDAC also conducts laboratory analysis on these products prior to registration for distribution, sale and consumption; including for surveillance and monitoring purposes.

The Standards Organisation of Nigeria (SON) establishes standards and codes of hygienic practices for food and food products in Nigeria.

The States and Local Government Authorities (LGA) in collaboration with the National Primary Healthcare Development Agency are responsible for street food vending, catering establishments and traditional markets, environmental sanitation, prevention and monitoring of food environments and handlers and the quality of public water.

The Ministry of Agriculture and Water Resources is responsible for good agricultural practices and monitoring and development of new technologies.

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

Registration is a requirement for production, distribution, sale and use imported and locally produced packaged foods. Inspection is a requirement for registration. Therefore bearing of NAFDAC registration number is food safety indicator for packed foods. However monitoring of street vended foods and food sold in the traditional markets has not been very effective. The catering establishments, on the other hand are better monitored and some awareness activities are being conducted by NAFDAC.

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

The Federal introduced free and compulsory education up to secondary school level under the Universal Basic Education Programme. It also established training for school leavers, in preparation for employment and to starting small scale industries. The government also established the Consumer Protection Agency to protect consumers rights. NAFDAC regularly conducts public and school awareness activities, media advertisements, alert publications and stakeholders' consultative meetings.

There are still many challenges facing adequate monitoring especially on the part of the State/LGAs and implementation of development programmes by the Ministries of Health and the agriculture sector. Collaboration and coordination could be improved.

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

Adequate funding, training, capacity building and commitment to purpose of food safety are some steps taken to sustain food safety. However not all the sectors responsible for food safety are in the position to achieve this.

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

Street vending is not institutionalized in that it is not organized and regulated. Women are in the majority involved in street vending

Best regards

Stella A. Denloye  
National Agency for Food and Drugs Administration and Control  
(NAFDAC)  
Nigeria

**Contribution by Abdullatif Baroudi, from the Ministry of Supply and Inter-trade, Syria**

Dear Colleagues,

**1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

Syria already launched a new food safety Law (No 19 of 28\10\2008) which will start its implementation soon on 28\10\2009, (the law was issued in cooperation with legal experts of FAO in order to be in line with international requirements). The mentioned Law covers all food hygiene issues (item 12).

HACCP systems (ISO-22000) are implemented by some food manufactures, but this issue will be managed by special authority after establishing the national council for quality which will be issued by presidential act and it will belong to the public sector. It will regulate the infrastructure of food quality (standardization, metrology, accreditation conformity assessment, and marketing surveillance including monitoring the procedure of certification: ISO 9001, 22000, HACCP ...etc.)

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

There are old monitoring mechanism in Syria which are implemented up to now (as for the food safety not start work yet as mentioned above). The mentioned old mechanism implements a range of acts and technical regulations related to the food safety issues and are put in place by several Ministries: Economy & Trade, Health, Local Affaires, Industry, Custom Administration.

New mechanism will be implemented which will be operated by Syria-FDA or by two ministers (Economy & Trade (for processed & semi processed products), Agriculture (for raw agriculture's products)).

The key food safety indicators used in monitoring the implementation of our programmes are the maximal limits of contaminants: chemicals, microbiological, fiscal) required by the acts of key ministries & Syrian standards.

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

There are no special mechanisms to collect/share food safety data across sectors as every institution collects own data, but when there are some food safety contaminations, the organizations which determined the non-compliant products sent the information to the Ministry of Economy as it is the competent authority to confiscate the non-satisfying products and withdraw them from the market .

The new mechanism which the new food law plans to install is an organized electronic exchange of data between sectors & ministries.

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

The law of consumer protection No 2 of 2008 has items which cover the steps to be taken for strengthening consumer awareness, consumer education and empowering the consumer. These activities are operated by the consumer protection societies, which ministries have to sponsor through special budget, as mentioned in the Law.

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

The street food vending systems are not institutionalized, but it is regulated by acts issued by the ministries of Economy & Trade, Local Affairs, the new food safety law. The council of food safety is assigned to it though the food safety law.

Best Regards

Dr. Baroudi  
Ministry of Supply and Inter-trade  
Syria

**Contribution by Eva O. Edwards, from the National Agency for Food and Drugs Administration and Control (NAFDAC), Nigeria**

Dear All,

The discussions so far have been great. Keya Chatterjee has raised a very important issue: how will the common man get to know if he is getting safe food items? Food safety is a serious public health issue and thankfully is receiving heightened attention from governments all over because of recent food safety incidents. In Nigeria, the common man knows to always look out for a NAFDAC registration number on packaged food items which is his proof that he will consume a safe food product. This is because NAFDAC has done extensive sensitization and awareness campaigns on features to look out for in 'safe' regulated products. It goes beyond this however because of substandard products/faking as well as the unorganized sector where often no heed is paid to standards. The challenges therefore are in tackling the issue of substandard products/faking (and NAFDAC is winning in this area) and institutionalizing street food vending/open markets. It will be very useful to hear from discussants who have achieved



institutionalization of street food vending/open markets in their countries. I believe this is a common challenge for developing countries.

Useful as a food safety indicator in monitoring the implementation of food safety mechanisms would be accurate data on food borne illnesses but sadly this is also an area of great challenge so it becomes really difficult to observe any trend. What we do have however are consumer complaints which often lead us to take necessary regulatory actions in sectors of the food industry, an example is the mandatory introduction of EBLs in bottling operations (for drinks). As far as collecting/sharing food safety data goes, aside from the individual efforts of NAFDAC, other government bodies with a role for food safety and sectoral groups, there are presently plans underway to centralize all food safety data/research work in the field so that all information/data on food safety can be channelled through a central national point for dissemination to all stakeholders. This will go a long way towards a cohesive national approach to food safety issues, it will also bring about more collaboration and cut out a lot of duplication of research efforts in this area.

Eva .O. Edwards  
National Agency for Food and Drug Administration and Control (NAFDAC)  
Nigeria

### **Contribution by Dries Pretorius from the Department of Health, South Africa**

Dear all,

#### **1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

Regulations have been published by the Minister of Health on food hygiene and HACCP ([http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/HACCPregs.pdf](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/HACCPregs.pdf)). These regulations are enforced by municipalities at a local government level, (which are the responsibility of the 6 metro and 46 district municipalities), and regarding food hygiene a Certificate of Acceptability is required before food can be handled on a food premises issued by the mentioned authorities. Regarding the HACCP regulations the Minister has the authority to list specific sectors/food handling enterprises to ensure that HACCP becomes mandatory regarding those situations. You can find a copy of the notice that appeared in the Government Gazette for public comment of the first listings, which are currently in the process of being finalized, here [http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/HACCPlistingdraft.pdf](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/HACCPlistingdraft.pdf).

Please find also a document providing details of the application of HACCP in South Africa compiled by the former Director: Food Control, Dr Theo van de Venter at [http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/HACCP.doc](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/HACCP.doc).

#### **2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

Food safety related monitoring, namely inspection of food premises/foodstuffs and sampling of foodstuffs, are the responsibilities of the municipalities for foodstuffs manufactured and sold locally, as part of Municipal Health Services (MHS) as mentioned under Question 1 ([http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/ehservices.doc](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/ehservices.doc)). The nine provincial health departments are responsible for imported foodstuffs as part of their Port Health Services (PHS) and as it relates to the relevant legislation applicable to the health sector ([http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/rolerespons.doc](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/rolerespons.doc)).

Please find a work book document (excel) which includes the indicators for MHS (lines 33-55) and for PHS (lines 60-61) related to Food Control and which is currently in the process of being implemented as part of the District Health Information System (DHIS), of the Department of Health at [http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/EHSindicators.xls](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/EHSindicators.xls).

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

Please find an information document summarizing the current Food Control System in South Africa at [http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/SA\\_Food\\_control\\_system.doc](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/SA_Food_control_system.doc).

Currently there are no specific mechanisms in place to collect/share food safety data across sectors/organizations and this is happening on an ad hoc basis depending on the issue in question e.g. when preparing for a visit by the relevant office of the EU to audit a specific sector, such as fruit and other agricultural products of plant origin, for export to that market. An Agriculture/Health Task Team has been established to create of an integrated, new food control system for South Africa, which is currently in the process of conducting a country profile.

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

The Directorate: Food Control liaise regularly with the two consumer organizations namely, the South African National Consumer Union (SANCU) and the National Consumer Forum (NCF) and apart from participating in their meetings and other events such as national conferences, the Directorate recently participated at several occasions together with the NCF in panel discussions on the consumer programme: 'Its Your Right' broadcast on television by the national broadcaster, SABC, on topics such as Melamine in foodstuffs, Bisphenol A in baby bottles, labelling of foodstuffs, etc. The poster of WHO on the 5 Keys to Safer Foods was also inserted in the quarterly publication of the NCF and of which 200,000 copies are distributed to the public free of charge

As part of its information, education and communication (IEC), activities, the Directorate has developed posters and pamphlets on various food safety topics, for example, the safe preparation of chicken and eggs and translated the 5 Keys poster in local languages such as Zulu. ([http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/Zulu\\_Poster\\_Final.pdf](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/Zulu_Poster_Final.pdf)) ([http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/5keys\\_en.pdf](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/5keys_en.pdf))

The material in question has been distributed provinces and municipalities for further distribution to food premises, schools, clinics, etc. The 5 Keys training programme has also been adopted by the Directorate as one of its projects for the preparations of the FIFA 2010 Soccer World Cup and the rollout of the programme for the training-of-trainers by six universities of technology is currently underway, an information document from WHO in this regard can be found at: [http://typo3.fao.org/fileadmin/user\\_upload/fsn/docs/The\\_Five\\_Keys\\_to\\_Safer\\_Food\\_Training\\_Programme.doc](http://typo3.fao.org/fileadmin/user_upload/fsn/docs/The_Five_Keys_to_Safer_Food_Training_Programme.doc).

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street vending?**

South Africa considers the informal sector as a very important component of its economy and supports the development thereof. The health sector contributes to this aspect, among others, through ensuring that the hygiene legislation mentioned under point 1 is applicable to situations where food is handled/prepared by vendors, as well as the implementation of a FAO TCP Project on Improving Street Foods in South Africa. Full details of the project, including documents containing all the relevant information related to street foods in South Africa is available on the web site of the Directorate at: [http://www.doh.gov.za/departement/dir\\_foodcontr-f.html](http://www.doh.gov.za/departement/dir_foodcontr-f.html) under the sub heading 'Projects'.

Best regards,

Dries Pretorius  
Director Food Control  
Department of Health  
South Africa

### **Contribution by George Kent from the Univeristy of Hawaii, USA**

Discussions of food safety mechanisms should consider ways to apply the human right to adequate food. Adequacy includes safety. I explore ways in which this could be done in China in an essay available at <http://www2.hawaii.edu/~kent/HUMAN%20RIGHTS%20AND%20THE%20GOVERNANCE.doc.pdf>

Aloha, George Kent

### **Contribution by Dolly A. Jani from Consumer Education & Research Centre (CERC), India**

Dear Colleagues,

Greetings from CERC!

The reply to your queries is as given below:-

**1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

The Food Safety and Standards Act, 2006 (34 of 2006) was enacted by the Parliament with objective to consolidate the Laws relating to food and to establish Food Safety and Standards Authority of India for laying down science based standards of articles of food and to regulate their manufacture, storage, distribution, sale and import, to ensure availability of safe and wholesome food for human consumption and for matters connected therewith or incidental thereto. The copy of the Food Safety and Standards Act, 2006 and notification relating thereto are available on Ministry's website: [www.mohfw.nic.in/pfa.htm](http://www.mohfw.nic.in/pfa.htm) or [www.fssai.gov.in](http://www.fssai.gov.in)

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

CERC, equipped with Product Testing facilities on most modern sophisticated instruments at the in-house Laboratory has been carrying out Comparative Testing of Products with a view to educate consumers for the best buy amongst the brands tested by CERC in the laboratory. Such a critical, penetrating study is expected to engender urge and vigil for corrective action at producers end too.

Comparative testing differs from product testing. Comparative Testing provides information and strategy for choice amongst competitive brands. Whereas simple product testing aims at providing information on quality only. Comparative testing is an evolutionary process. It leads to strengthening of informed choice aspect of a product and thereby providing maximum protection to Consumers' interest and rights.

CERC is also member of the standards formulating bodies such as the Central Committee for Food Standards (CCFS) and the Bureau of Indian Standards (BIS). These committees formulate, revise and upgrade the quality and safety standards for foods.

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

It is very true that one of the major constraints to effective monitoring is lack of collaboration and coordination between public service organizations, NGOs and ministries. A copy of Annual Work Report of various Public Health Laboratories functioning across the country is circulated to concerned Government Departments and also to Consumer Associations.

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

There is hardly any controversy with regards to the role of a consumer organization in protecting public interest in India. Several laws have been enacted to give explicit recognition to this fact.

Some of the important laws are as under:

- 1) Drugs and Cosmetics Act, 1940.
- 2) Prevention of Food Adulteration Act, 1954
- 3) Essential Commodities Act, 1955.
- 4) Bureau of Indian Standards Act, 1986
- 5) Consumer Protection Act, 1986
- 6) Monopolies and Restrictive Trade Practices Act, 1969.

A consumer organization often makes use of the media for education of consumers. It focuses public attention on defects in goods, deficiency in service and unfair trade practices of commercial undertakings by publicizing the information with regard to the products, and services of various kinds.

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

The street food vending system has not yet been institutionalized in our country. Although efforts are being made to ensure safe, hygienic, nutritious and economic snacks are available to the public through such channels.

There are several women's Self Help Groups (SHG's), cooperatives and Government – aided programmes being run in the country which are in the business of making and selling snack food items through retail outlets.

Many thanks,

Best Regards,

Dolly A. Jani  
Manager – Food Laboratory  
CERC  
INDIA.

**Contribution by Oscar Posas from Leyte State University, Philippines**

The issue on food safety is truly critical. This is not just in milk (this is not a major component of our diet here in the Philippines) but other food items like vegetables, fish and meat. Does anyone know about a very quick test (inserting a probe in a slice of fresh meat or fresh fish or dipping it in a fresh sap of vegetables or other food items) that such contain(s) toxic substances without going through the sophisticated and expensive means (those requiring expensive equipment and probably reagents/chemicals)?

**Contribution by Abgar Yeghoyan from Protection of Consumers' Rights NGO, Armenia**

**1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

The law which enforces to do food hygiene requirements is the Law on “Food Safety of the RA”. Meantime the same Law states that the Government of Armenia is responsible to decide the deadline for food producers to include HACCP systems in their factories. Government Decree N 531 says that January 1st of the year 2011 is the deadline for mandatory inclusion of the system in the food production. Some of the key food producers already have the system in their production chain.

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

Protection of Consumers' Rights NGO (PCR) independently carries out monitoring of shops and supermarkets to identify dangerous food products there. Our work is to check the temperature conditions, not labeled and expired products sold there.

**3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

The first hand information PCR receives from consumers. Meantime PCR works with the Food Security and Veterinary Inspectorate of the Ministry of Agriculture of Armenia. We are periodically sharing the information on monitoring results. Also PCR independently carries out monitoring of shops and supermarkets to identify dangerous food and notifies about it the Inspectorate. Also PCR takes part in destruction of dangerous food recalled from the market of Armenia together with the Inspectorate.

PCR posts Inspectorate's monitoring on its website ([www.consumer.am](http://www.consumer.am)).

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

To reach out to as many consumers as possible PCR along with advocacy efforts disseminates the information on consumers' rights in Armenia. PCR has initiated publications of consumer manuals and leaflets on basic rights of consumers, food labelling, rights and responsibilities of public utility providers and consumers. In the framework of its public awareness raising campaigns PCR shoots and broadcasts Public Social Advertisements thus drawing attention of public on different consumer issues. PCR periodically organizes trainings, seminars and press conferences for the consumers in all regions of Armenia for raising awareness of consumers' rights protection issues. PCR actively works with mass media periodically providing information to them for dissemination. PCR provides consultations to concerned consumers through its hot-line and at its Resource Center.

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

No, the street vending system is not institutionalized in Armenia, because it is not a common for Armenia.

Abgar Yeghoyan  
President  
Protection of Consumers' Rights NGO  
Yerevan, Republic of Armenia

## **Contribution by Rose Omari from EatSafe, Ghana**

### **1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

The Food and Drugs Board (FDB) under the Ministry of Health is the regulatory body responsible for food product manufacturing, importation, exportation, advertisement and distribution. The FDB was established under the Food and Drugs Law of 1992, (PNDCL 305B) but became fully operational in 1997. FDB licences and registers all manufacturers and their products, issues export certification in accordance with international mandatory requirements, conducts safety monitoring, export and import control, inspection of manufacturing premises, and post market surveillance.

The FDB currently assists local food manufacturers/processors in the implementation of food safety management system such as the GMP and HACCP system, conducts Food Safety Audits, training programmes for manufacturers or processors, staff of the hospitality sector, catering, schools etc.

FDB has a quality control laboratory which evaluates the quality of food to enable the Board take regulatory actions either to grant marketing authorisation, grant certificate of manufacture or free sale for export purposes.

### **2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

The FDB has put in place certain guidelines which must be followed by persons engaged in formal Food businesses. There are guidelines or requirements for:

- importation of Pre-packaged Food
- registration of pre-packaged Food
- regulation of animal feed
- registration of livestock products
- export of palm oil
- abattoirs and slaughter slabs
- Labelling pre-packaged food
- regulation of meat markets/shops
- Food Adulteration
- Food Advertisement

The FDB Licenses food manufacturing premises, registers food products, evaluate food product labels to ensure conformance to the labelling law, undertake inspection of food or systems for control of food, raw materials, processing and distribution, in order to verify that they conform to current Good Manufacturing Practices (cGMP).

Products which have been successfully registered by the FDB are issues with the FDB registration numbers but it is not currently mandatory to include the FDB registration number on the product label though there are plans to make it mandatory in the near future. Failure to comply with the above requirements will compel the FDB to prohibit the importation, distribution, sale or use of any pre-packaged food product, temporarily or permanently as well as impose a fine against any product of a particular company.

### **3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

Lack of coordination and collaboration has been a major drawback in the fight to improve the safety of our food. In Ghana there are other agencies such as Ghana Standards Board, Environmental Protection Agency, Customs, Excise and Preventive Services, Ghana Tourist

Board, Veterinary Council, Plant Products and Regulatory Services, Public Health Departments of the Municipal and District Assemblies which are all under different ministries and playing one role or another in ensuring food safety. It is important to harmonize the activities as well as the several regulations and codes of these agencies. The National Food Safety Task force was been formed with members drawn from various agencies and departments. The Task Force drawn a national Food Safety Action Plan and proposed among others that the FDB be made the central food safety agency to coordinate all activities related to the regulation of food safety- the proposal is yet to be officially accepted.

**4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

The Consumer Protection Bill is still awaiting passage however the FDB and some organizations sometimes involve some consumer organizations in their activities. The FDB currently is constrained in terms of personnel, to carry out effective consumer education however consumer organizations are not given adequate support in terms of finance and logistics.

**5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

Street food vending is currently not institutionalized but there are efforts to get this done. The Municipal Assemblies and the Ghana Tourist Board have bye- laws and guidelines which govern the establishment and operation food businesses including street food vending. The problem stems from the fact that most of the vendors are unaware of these requirements and the regulatory authorities are also not able to create awareness and enforce the laws.

Some studies have shown that 70-90% of street food vendors in Ghana are women. However there is an emerging phenomenon where young men are joining the trade mainly vending fast food (fried rice, fried chicken, and chopped vegetable). Their food is known in Ghana as "check-check" and they are scattered all over especially Accra and Kumasi.

All the Best,  
Rose Omari  
EatSafe Ghana  
Accra  
[google.com/site/eatsafeghana](http://google.com/site/eatsafeghana)

**Contribution by Alphonse Issi, Cameroon**

**1) How is the legislation on food hygiene and HACCP systems implemented in your country?**

In Cameroon the legislation on food hygiene and HACCP is being implemented by the National Committee for Codex Alimentarius and Food Safety established by the Government. This committee includes representatives of public services interested in food safety, representatives of the private sector in the food industry and consumer organizations, who represent civil societies.

**2) How did you put in place your monitoring mechanisms? What are the key food safety indicators used in monitoring the implementation of your programmes?**

Within the national committee, there are thematic working groups. The main mechanisms for monitoring food quality are the government's control mechanisms. The indicators for food safety are being developed.

- 3) What are the mechanisms in place to collect/share food safety data across sectors and organizations? We find that one of the main constraints to effective monitoring is lack of collaboration and coordination between sectors and ministries.**

These mechanisms are currently being developed. After the first meeting of the committee to develop the procedures manual, mechanisms for gathering and sharing data on food safety between sectors and organizations will be soon implemented. In the near future, in Cameroon, obstacles related to the lack of collaboration in the field of food safety will be a memory.

- 4) What are the steps taken in strengthening consumer awareness, consumer education and empowering consumer associations for protecting food safety and sale of safe foods?**

Programs on capacity development for consumers and other stakeholders are planned and are supported by the Government and FAO. They will soon be implemented.

- 5) Is the street food vending system institutionalized in your country? How was this achieved? What is the extent of women's involvement in street food vending?**

The sale of food in the street in Cameroon is informal. This is done in an unacceptable disorder, in a context of poor sanitation and lack of hygiene - It is said that all this happened because of poverty, that for earning a living a large number of unskilled workers are set in these tasks of preparation and marketing of food. Among them women constitute the largest lot.

#### **Original response in French**

- 1) Comment est-ce que la législation sur l'hygiène alimentaire et les systèmes HACCP est mise en œuvre dans votre pays?**

La législation sur l'hygiène des aliments et le système HACCP est mise en oeuvre au Cameroun par le Comité National du Codex alimentarius et de la sécurité sanitaires des aliments mis en place par le Gouvernement. Ce Comité comprend les représentants des administrations intéressées par la sécurité sanitaire des aliments, ceux du secteur privé venant de l'industrie alimentaire et la société civile qui y est représentée par les organisations de Consommateurs

- 2) Comment avez-vous mis en place des mécanismes de surveillance? Quels sont les principaux indicateurs de sécurité sanitaire utilisés dans le suivi de la mise en œuvre de vos programmes?**

Au sein du comité national, il existe des groupes de travail thématiques et les principaux mécanismes de surveillance de la qualité des aliments relèvent du domaine des structures de contrôles de l'Etat. Les indicateurs de sécurité sanitaire utilisés sont en train d'être élaborés

- 3) Quels sont les mécanismes en place pour recueillir / partager de données de sécurité sanitaire entre les secteurs et organisations? Nous constatons que l'un des principaux obstacles est le manque de collaboration et de coordination entre les secteurs et les ministères.**

Ces mécanismes sont en cours d'être élaborés. Après la première réunion du comité pour élaborer le manuel de procédures, le temps sera bientôt venu pour la mise en place des mécanismes de recueil et de partage des données sur la sécurité sanitaire des aliments entre les secteurs et les organisations. Bientôt au Cameroun, les obstacles de manque de collaboration dans le domaine de la sécurité sanitaire des aliments seront un souvenir

- 4) Quelles sont les mesures prises dans le renforcement de la sensibilisation des consommateurs, l'éducation des consommateurs et l'autonomisation des**



## **associations de consommateurs pour la protection de la sécurité sanitaire et de la vente d'aliments sains?**

Des programmes de renforcement de capacités des consommateurs et d'autres acteurs sont prévus et sont soutenus par le Gouvernement et la FAO. Ils seront bientôt mis en oeuvre

### **5) Est-ce que le system de vente des aliments dans la rue est institutionnalisée dans votre pays? Comment cela est-il réalisé? Quelle est l'ampleur de la participation des femmes dans la vente des aliments dans la rue?**

La vente des aliments dans la rue au Cameroun relève des activités informelles. Cela est réalisée dans un désordre inadmissible, dans un contexte d'insalubrité et de manque d'hygiène - On dit que tout cela est arrivé à cause de la pauvreté qui a jeté dans ces tâches de préparation et de commercialisation des aliments une importante main d'oeuvre non qualifiée et doit se débrouiller pour vivre, parmi ces acteurs les femmes constituent le plus gros lot.

### **Contribution by Shambu Ghatak, Centre for the Study of Developing Societies, India**

Dear all,

There are certain points, which I would like to place before the forum, on food safety.

Food safety is very much related to personal and community hygiene. In developing and poor countries, hygienic practices matter a lot to prevent water borne diseases. Some practices such as cleaning of hands with soap after excreting and before eating can be imbibed among the people through education, adult literacy missions and via interventions and capacity building exercises by the NGOs and the popular media. Hygiene interventions including hygiene education and promotion of hand washing can lead to a reduction of diarrhoeal cases by up to 45%. Access to clean drinking water is very much a need for assuring food safety. In 2002, 1.1 billion people lacked access to improved water sources, which represented 17% of the global population. Over half of the world's population has access to improved water through household connections or yard tap. Improved sanitation can reduce diarrhoea morbidity by 32%.

In a world full of unfair trade practices, at least one good practice followed is of carrying the message that breast milk is the best food for babies instead of the processed and packaged baby food. This has been possible because of interventions by the government and tough regulatory mechanisms. However, access to safe, nutritious and balanced food/ diet by the mothers matter a lot in determining the nutritional status of their children.

A new Bill in India proposes to establish the Food Safety and Standards Authority of India (FSSAI), which would lay down scientific standards of food safety and ensure safe and wholesome food. The FSSAI would be assisted by a Central Advisory Committee, a Scientific Committee and a number of Scientific Panels in specifying standards. The standards would be enforced by the Commissioner of Food Safety of each state through Designated Officers and Food Safety Officers. With a view to consolidate the laws relating to food in the country and for laying down science-based standards for articles of food and to regulate their manufacture, storage, distribution, sale and import, to ensure availability of safe and wholesome food for human consumption and for that purpose to establish the Food Safety and Standards Authority of India, Parliament enacted the Food Safety and Standards Act, 2006 (FSS Act). In order to know more about the FSSAI, kindly refer to the website: [http://www.prsindia.org/uploads/media/1167478283/legis1167478357\\_legislative\\_brief\\_food\\_safety\\_standards\\_bill\\_2005.pdf](http://www.prsindia.org/uploads/media/1167478283/legis1167478357_legislative_brief_food_safety_standards_bill_2005.pdf). The Bill prohibits the use of food additives, processing aid, contaminants, heavy metals, insecticides, pesticides, veterinary drugs residue, antibiotic residues, or solvent residues unless they are in accordance with specified regulations. Certain food items such as irradiated food, genetically modified food, organic food, health supplements

and proprietary food cannot be manufactured, processed or sold without adhering to specific regulations. There are people and groups who think that the new law if comes into being would discriminate against the street vendors.

In order to increase production of farm products and animals, producers adhere to application of chemical pesticides, fertilizers and various genetic resources. In India, there have been evidences of DDT strains being found in the food chain. There is no clear-cut uniform standard and guidance pertaining to labeling of organic food with non-GMO (genetically modified organisms) contents across the nations. There exists enough literature surrounding the debate on safety of GMO food as well as genetically engineered seeds.

Food security is about access to nutritious and safe food. Food standards that are enforced and accepted in one country, may not be accepted in other nations. Food safety laws and rules are complex in nature. One can pose a question whether there should be uniformity in food-based standards and norms across the nations. At the international level, the Codex Alimentarius [http://www.codexalimentarius.net/web/index\\_en.jsp](http://www.codexalimentarius.net/web/index_en.jsp) officially covers all foods, whether processed, semi-processed or raw, but far more attention has been given to foods that are marketed directly to consumers. In addition to standards for specific foods, the Codex Alimentarius contains general standards covering matters such as food labeling, food hygiene, food additives and pesticide residues, and procedures for assessing the safety of foods derived from modern biotechnology. It also contains guidelines for the management of official (i.e., governmental) import and export inspection and certification systems for foods.

Food safety is a matter of grave concern for every national government. However, in the past certain nations such as the United States, Australia, and the European Union countries, on the pretext of food safety (and also on other times on the excuse of human rights abuse, employment of child labour in the sweat shops of the Third World countries etc.) have imposed non-tariff barriers such as banning imports originating from the developing countries. The question is how to distinguish between a genuine situation say for example when India banned imports of baby milk food and powder from China during the past one year or so from a situation when countries restrict imports for adjusting their balance of payments situation and enhancing their export competitiveness.

The expenses on R&D done for ensuring food safety and technological innovation is quite inadequate in the developing countries vis-a-vis the developed world. The Western nations can help the poorer Asian, African and Latin American countries to develop new technologies related to food safety.

One broad indicator of food safety that can be proposed here is: Percentage of Gross Domestic Product (GDP) spent (or given as aid) by a developed country (higher income country, by taking into account the World Bank definition) on R&D of safer food technologies in the developing countries.

Shambu Ghatak

Centre for the Study of Developing Societies

New Delhi