



NATIONAAL INSTITUUT VOOR VOEDSELVEILIGHEID SURINAME - NIVS



National Instituut voor Voedselveiligheid Suriname
National Institute for Food Safety Suriname



FOOD REGULATORY FUNCTIONS FOLLOWING CODEX GUIDANCE

First Set of Horizontal Functions

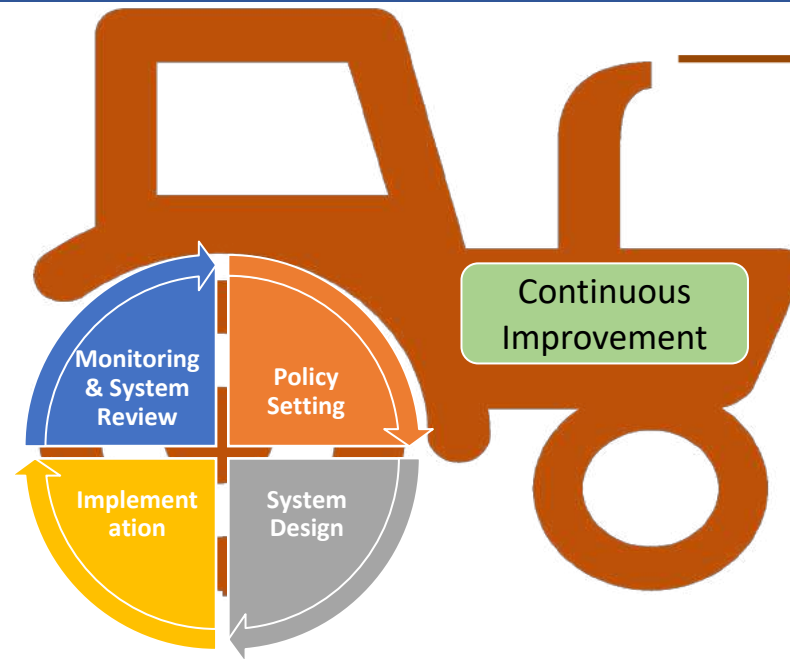
*12-14 Aug 2022
Paramaribo – Suriname*

Effective Food Control System

« The objective of a national food control system is to **protect the health of consumers and ensure fair practices in the food trade** »

PRINCIPLES AND GUIDELINES FOR NATIONAL FOOD CONTROL SYSTEMS

CAC/GL 82-2013



PRINCIPLES OF A NATIONAL FOOD CONTROL SYSTEM (13)

PROTECTION OF CONSUMERS

THE WHOLE FOOD CHAIN APPROACH

TRANSPARENCY

ROLES AND RESPONSIBILITIES

CONSISTENCY AND IMPARTIALITY

RISK BASED, SCIENCE BASED AND EVIDENCE BASED DECISION MAKING

COOPERATION AND COORDINATION BETWEEN MULTIPLE COMPETENT AUTHORITIES

PREVENTIVE MEASURES

SELF ASSESSMENT AND REVIEW PROCEDURES

RECOGNITION OF OTHER SYSTEMS (INCLUDING EQUIVALENCE)

LEGAL FOUNDATION

HARMONISATION

RESOURCES

(Codex, 2013)

Assessment Tool by FAO/WHO

B.2.3.5. ASSESSMENT CRITERIA: Strategies and guidance for communicating with partners, stakeholders, general public and international organizations are in place.

Guidance: Effective communications are essential and need to be well prepared in advance of the food safety emergency. The aim is to provide accurate, timely and relevant information to a range of very different audiences, therefore with different needs, and ensure a common understanding of the problem. Besides communication among CAs (and with the central coordination team, to ensure implementation of response and flow of technical information), as seen in criteria B.1.3.4, communications should also target:

- (i) Interagency communications, including with local and foreign governments, as well as IOs (i.e. WHO, in particular to respect IHR requirements; and INFOSAN focal points);
- (ii) Industry;
- (iii) General public through the media.

A basic tool is a list of all necessary contact details readily available and updated. Other useful tools that should be prepared in advance are: templates for notifications of incidents, model press releases, recall and withdrawal notices, prepared questions and answers... Means of dissemination include websites, TV, radio, press and specific material adapted to the literacy level of the population so that information is transferred in a way that makes it accessible to all, including populations in rural areas. Advice should contain practical information on what to do if somebody has consumed the affected product; on what has been and is being done to contain affected product; and on contact details for more factual information and specific advice.

A trained spokesperson, recognized to have authority on the topic, should also be available.

Possible outcome: Communications are made strategically.

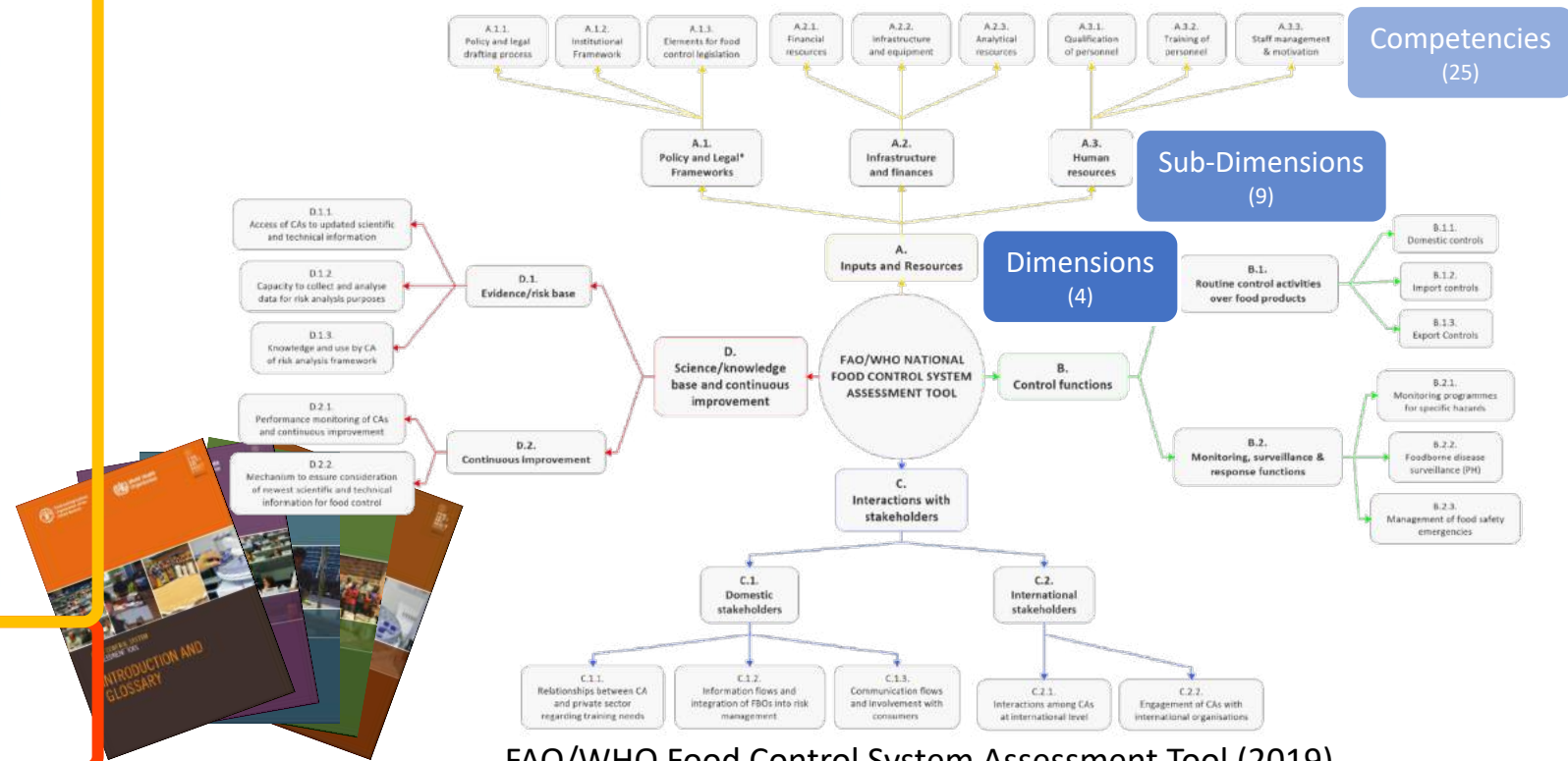
Possible indicators:

- List of all necessary contact details readily available and updated (local and foreign governments, IOs, Industry);
- Designated and competent spokesperson;
- Readily available means of dissemination for the general public (websites, TV, radio, press, specific material...);
- Activities aiming at preparing effective communications for food safety emergency responses have occurred periodically as a matter of formal policy;
- Investments have provided tangible improvements in the government's preparedness for food safety emergency responses.

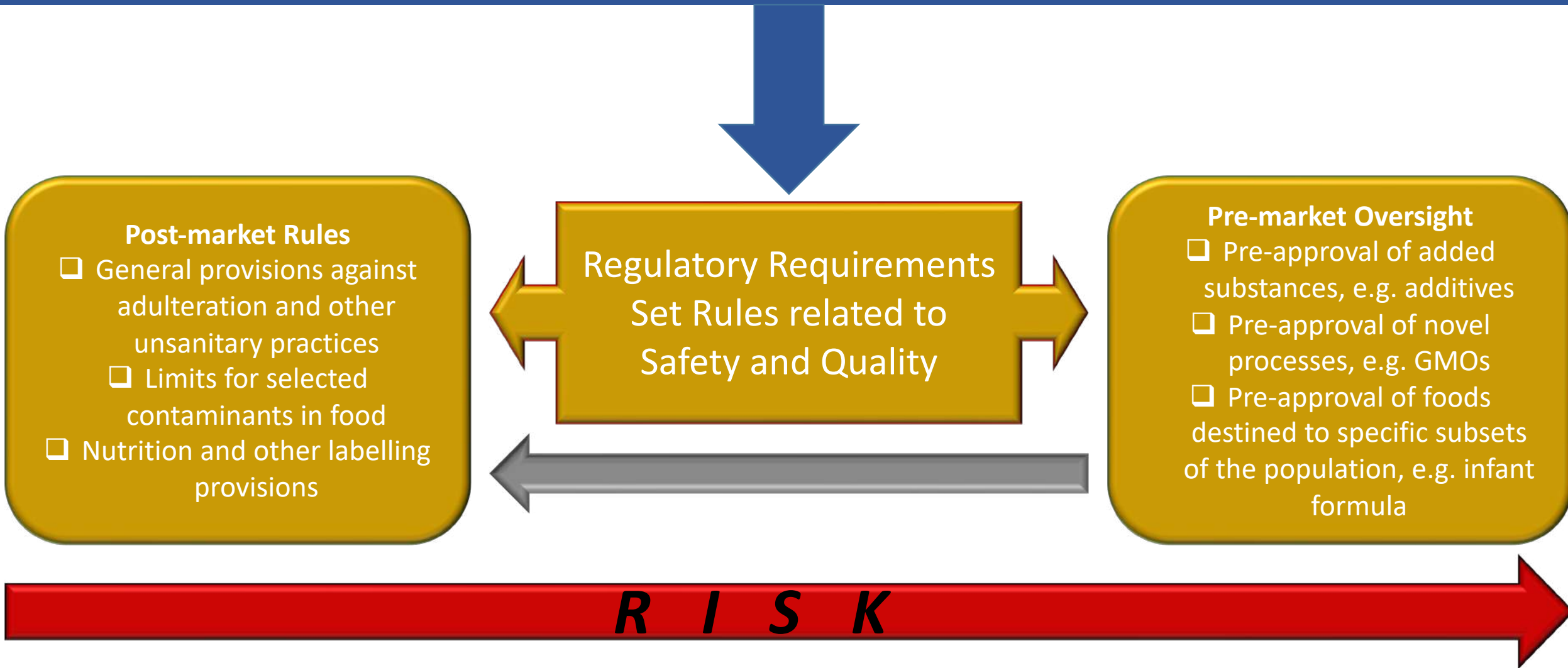
Sources of evidence:

- List of all necessary contact details (local and foreign governments, IOs, Industry);
- Templates for notifications of incidents;
- Model press releases;
- Recall and withdrawal notices;

- Comprehensive with **162 criteria** covering the entire FCS
- Availability of Guidance, including Suggested Outcomes and Indicators
- Evidence-Driven (Documents, web postings, certificates, minutes terms of reference, etc.) to demonstrate achievement of a given competency

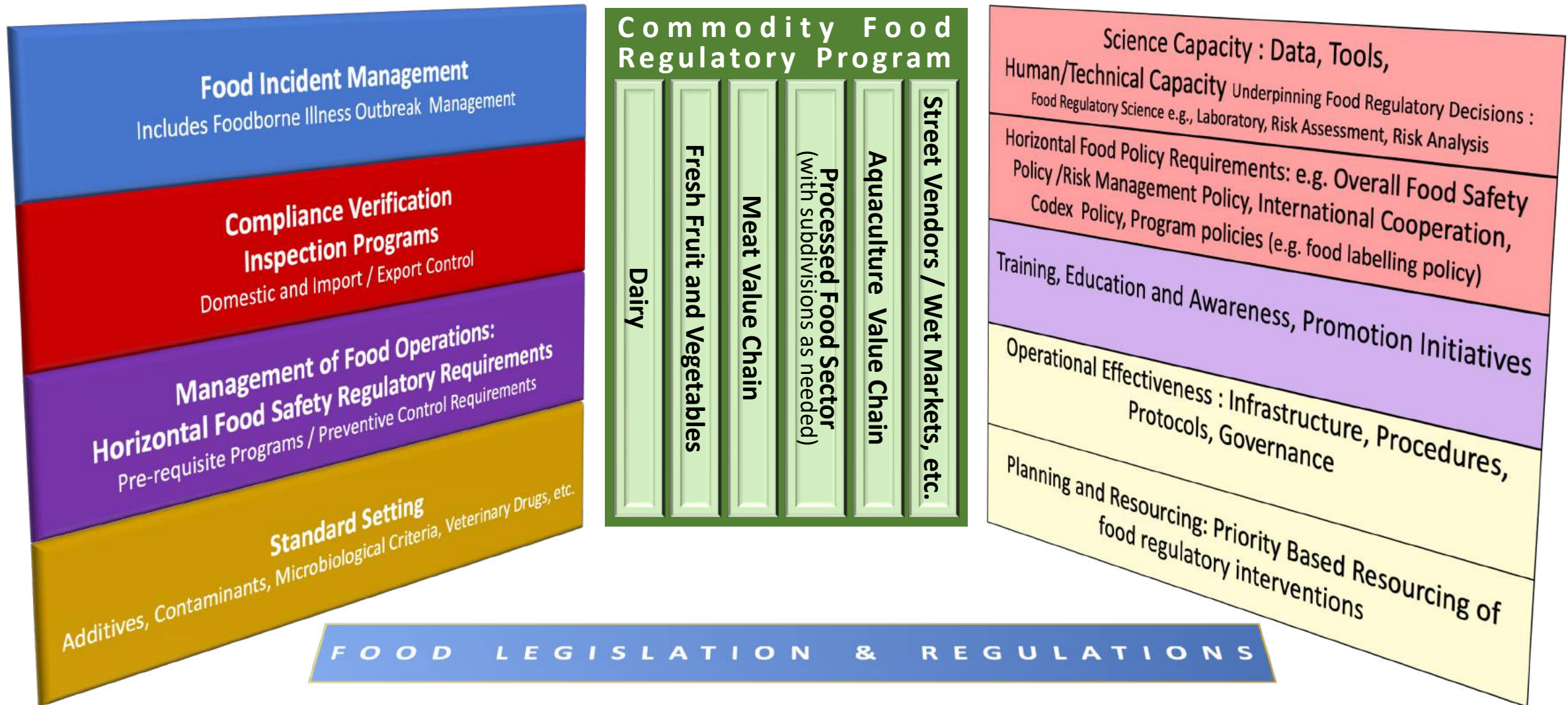


PRINCIPLE – Food are inherently Safe Products



Proposed Food Regulatory Functions

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Review and Enhance Food Legislation and Regulations

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The review of food safety legislation & regulations aims to conform with principles 11 & 12 of **CAC/GL 82-2013**.

Capacity building interventions will aim to:

- ❑ Review current statutes, laws and regulations that require consolidation and/or modernization.
- ❑ Develop drafting instructions in support of a legislative and regulatory policy that:
 - Aligns with modernized food safety statutes internationally.
 - Focuses on prevention and emphasizes the responsibility of food business operators.
 - Enshrines risk analysis at the core of food regulatory decision-making.
- ❑ Identify the necessary regulation-making authorities and recommend a structure for a food regulatory system that is:
 - Risk-based.
 - Adaptable to changes in the food supply chain and the evolution of the scientific evidence.
 - Supportive of the operationalization of the regulatory mandate of the competent authority / authorities:
 - Premarket review and approval mandate.
 - Promulgation of regulatory / food safety interventions, for example Microbiological criteria, Maximum levels of contaminants, Inspection and certification functions domestically and for imports.



Example of Indicators of Performance

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1 – Food Safety Legal and Institutional Structure

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MAPPING OF INDICATORS OF PERFORMANCE	
1. Competent Authority(ies) and Legal Framework(s)	
Indicator	Demonstration of Achievement
Roles and Responsibilities and mandates of competent authorities responsible for food of animal origin	Texts: laws, regulations, decrees describing the mandate of the organisations / competent authorities
Legal framework providing empowerment and enabling interventions of competent authorities	<p>Demonstration of “recent” nature of legal framework (laws and regulations)</p> <p>Legal framework encompasses the powers / authorities needed for intervention by competent authorities and is based on international guidance and best practices:</p> <ul style="list-style-type: none"> ➤ Defines relationship between regulators and regulated parties ➤ Defines penalties and sanctions ➤ Supports Preventive approach in risk management ➤ Supports anchoring decisions in risk analysis ➤ Supports harmonization with international standards (references international standards) ➤ Offers enforceability of decisions made by competent authorities <p>Demonstration of existence of Regulation-making Authorities that allows to exercise the mandate of each competent authority</p>
Coverage of the Supply Chain with food regulatory competencies from primary production to final products	<p>Mandates / Competencies provided by the legal texts (laws / regulations and decrees) empowering competent authorities attest to the coverage of the oversight on productions:</p> <ul style="list-style-type: none"> ➤ From the primary production sector (and its inputs), up to final (processed) products ➤ From primary producers to retailers, importers and exporters <p>Identification of coverage gaps or overlap where relevant</p>
Indicator of implementation of mandate is shared between various competent authorities: Required coordination and collaboration	<p>Legal requirements defining relationships between competent authorities</p> <p>Practical considerations of collaboration and coordination: Committee structure, agendas of meetings and minutes</p> <p>Identification of gaps in collaboration between regulators / competent authorities with overlap or adjacent oversight on the production supply chain</p>

2 – Enact a Food Safety Standard Setting Function

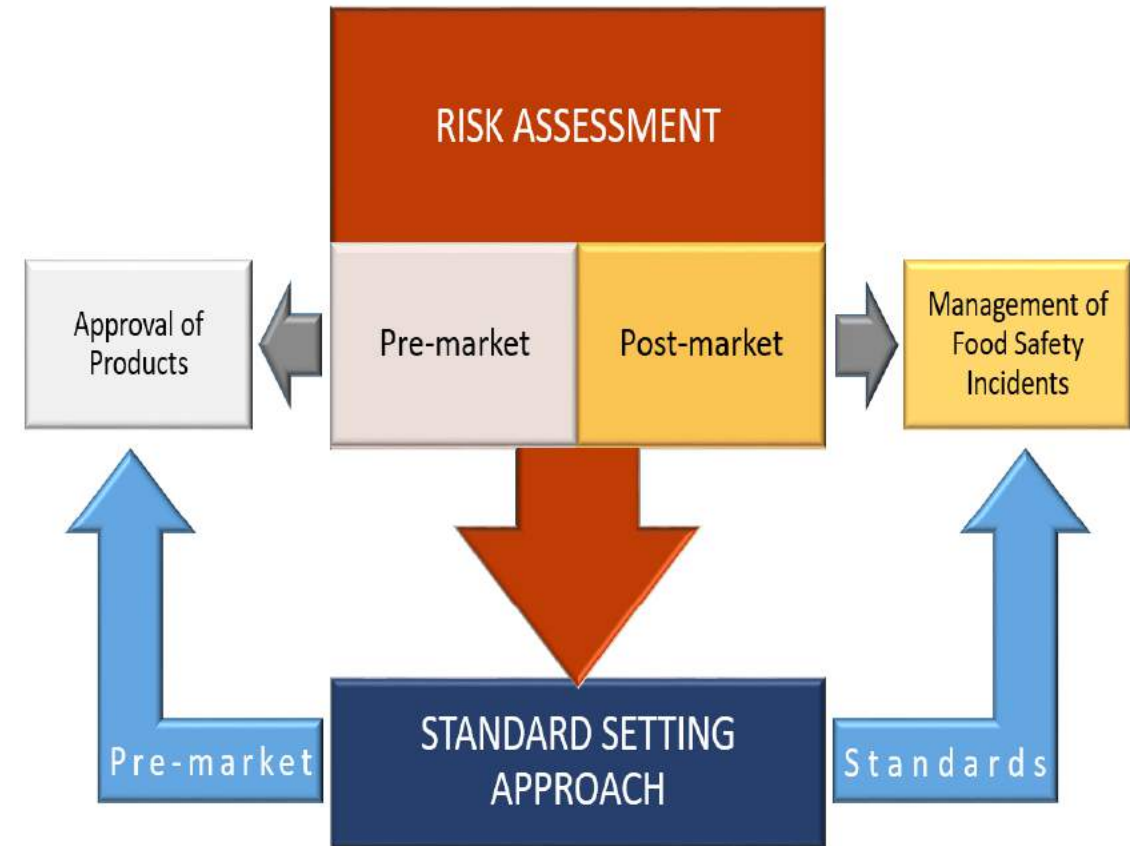
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Premarket :

- ☐ Food additives.
- ☐ Irradiation processes.
- ☐ Infant formula.
- ☐ Other food for special dietary purposes.
- ☐ Novel foods (including GMOs).

Operations of Premarket Program:

- ☐ Processing of applications from the industry sector
- ☐ Handling of preliminary risk assessments, along with international comparisons.
- ☐ Consolidation of existing approvals supported by international benchmarking and aligned with Codex approaches.
- ☐ Formulation of requirements for applicants.



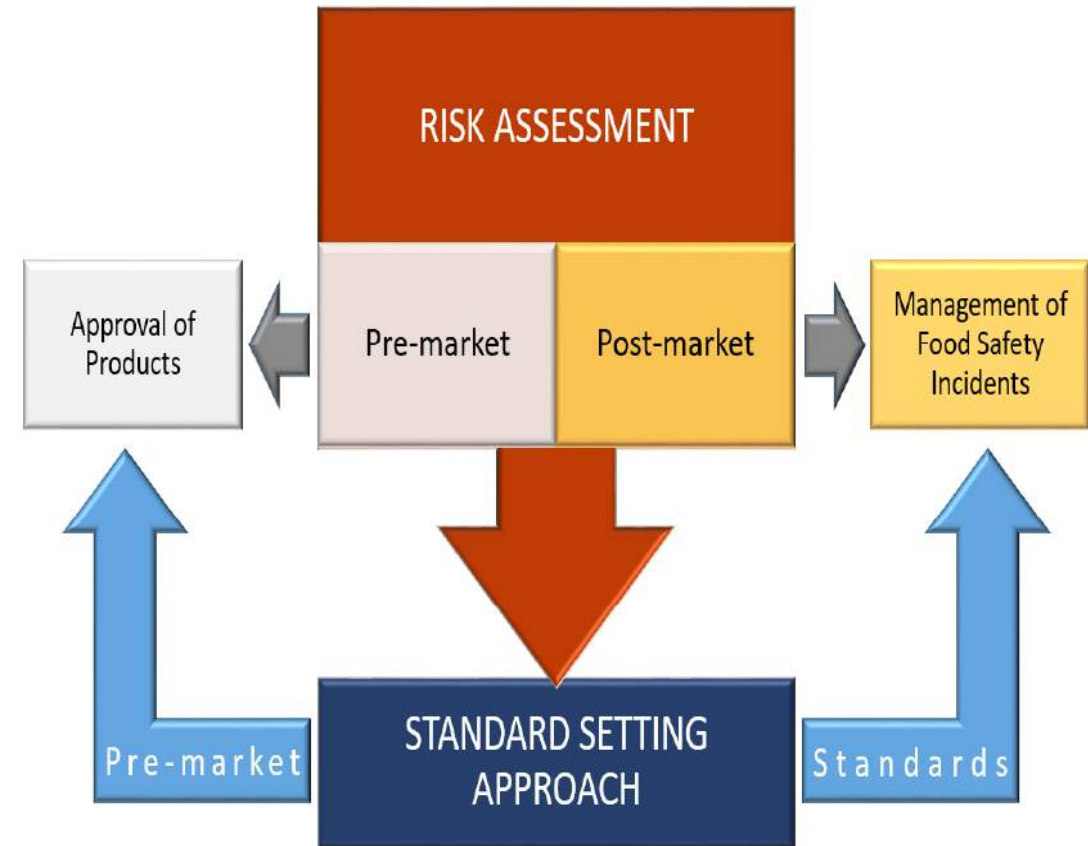
2 – Enact a Food Safety Standard Setting Function (2)¹⁰

Post-market:

- ☐ Maximum levels of contaminants.
- ☐ Microbiological criteria.
- ☐ Labelling requirements, for example:
- ☐ Nutrition labelling.
- ☐ Allergen labelling, etc.

Operations of Standard Setting Program:

- ☐ Review of existing provisions in each category of post-market standards.
- ☐ Update of provisions in accordance with Codex standards and / or other international benchmarks, such as (US FDA provisions, EU provisions, etc.)
- ☐ Establishment of processes, as well as scientific and regulatory policy foundations, for the long-term development of such requirements anchored in the the national food regulatory structure.



Indicators of Standard Setting

Regulatory Functions

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Mapping of Indicators of Performance	
2.1- Standard Setting	
Indicator	Demonstration of Achievement
<p>Standards of Food Safety and Quality Accessible to All Stakeholders and Partners, with emphasis on standards related to:</p> <p>A. Substances Used in Food Production (Direct Use)</p> <p>a. Use of Additives</p> <p>b. Processing aids, food contact Material, Incidental Additives Use of pesticides in conjunction with food production (e.g., fungicides and other pesticides authorized for use in animal husbandry practices)*</p> <p>B. Substances Indirectly in Food Production : Pesticides, Veterinary Substances</p> <p>C. Microbiological criteria, Chemical Contaminant requirements</p> <p>D. Labelling Requirements – Health Driven / Nutrition Driven</p> <p>E. Quality standards related to methods of production such as “Halal”, “organic”, “local” etc.</p> <p>*these functions may be related to horizontal standard development and therefore not specific to the value chain</p>	<p>(Web-enabled) documents provided upon request describing the relevant food safety and quality standards.</p>
Standards of Food Safety and Quality Benchmarked Against Codex Standards and Where Differences Exist, Such Differences are Justified by a Risk Rationale or a Clear Rationale	Documents / publications referring to food safety and quality standards identifying references to Codex.
Risk Assessments Supporting Standards / Technical Requirements Developed and Accessible such as risk assessment validating the adoption of a MRL for a Veterinary Drug Reside	Risk Assessments published or made available for food safety and nutrition standards, in particular for those differing from Codex.
Processes and Protocols to Develop Food Safety and Quality Standards are Clear / Accessible to All Stakeholders including	Documents / Notes / Minutes corroborating the existence of food standards decision-making processes / procedures – for example: minutes of Committee meetings.
Decision-making Process / Governance for Food Standards Discussion and Adoption Available to All Stakeholders (aspect that will be assessed in other areas of performance)	WTO notifications for standards

3 – Horizontal Standard Setting

Conditions of Operations of Food Business Operators in Accordance with the Preventive Approach

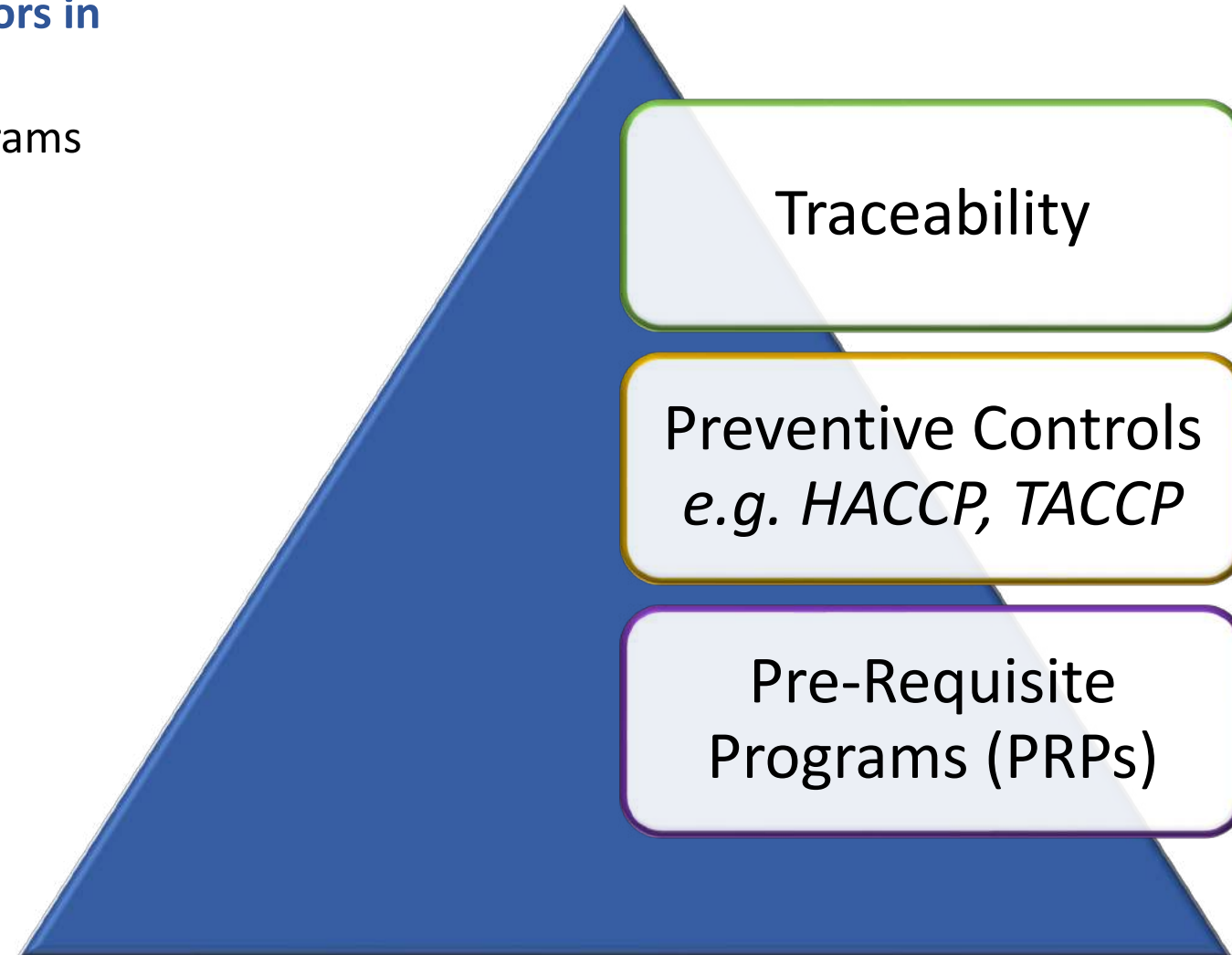
- ☐ Regulatory Requirements for Pre-Requisite Programs
- ☐ Preventive Controls : GHP, GAP, GMP
- ☐ Traceability Requirements

Application of These Requirements Incrementally

- ☐ Sector-Driven Approach
- ☐ Conditions underpinning Licensing Operations

Rules allowing the Identification of FBOs

- ☐ Supports the identification of Who Does What ?
- ☐ Supports Inspection Systems
- ☐ Supports Incident Management



4 – Compliance Verification and Enforcement

Enhance Food Inspection Capacity for Domestic Establishments, Imported and Exported Goods

- ☐ Review the current food inspection model, as part of the compliance and enforcement policy of the Competent Authority
- ☐ Apply a risk-based approach: measure commensurate with the risk – incremental approach
 - E.g. **VADE** approach (**V**oluntary compliance, **A**ssisted compliance, **D**irected compliance and **E**nforced Compliance)

Enhance Food Safety Incident and Foodborne Illness Management

- ☐ Develop and adopt procedures for (food safety) incident management (including measures to collect data, coordinate actions, assess results and formulate options for decision-making in the context of food safety incident management)
- ☐ Develop and Adopt Relevant procedures and protocols in a manner that is adapted to the structure of the food control system and involved partners (e.g. multiagency system versus single agency jurisdictions) – e.g. recall procedure, emergency response protocols
- ☐ Train Personnel to address food safety incidents and emergencies, **including the simulation of foodborne illness outbreaks**



Inspection / Conformity Assessment Model

❑ Choose your Inspection Model :

- Competent Authority Driven
- Third Party Driven
- Hybrid: With Space to Both Options



A primary vehicle for introducing new legislation and achieving behaviour change

1. Voluntary compliance

- Achieved through education, engagement, communication

2. Assisted compliance

- interventions heavily reliant on monitoring, support to compliance

3. Directed compliance

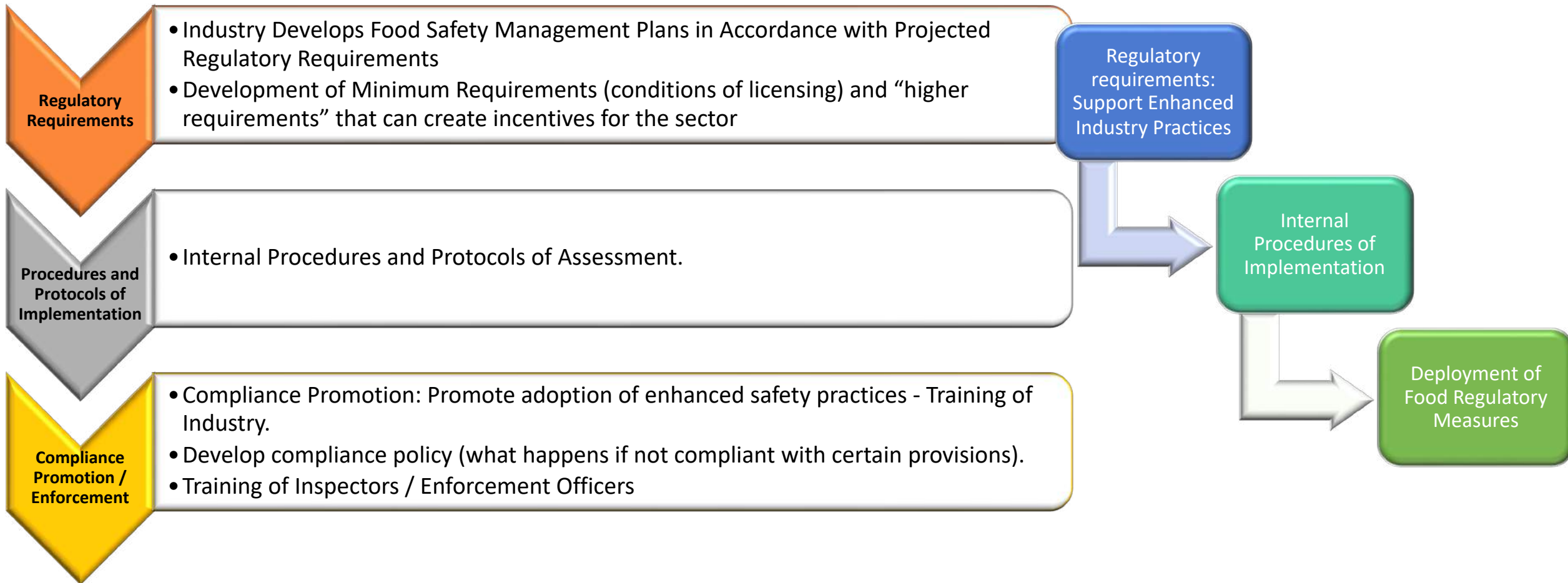
- range of tools to direct a desired behaviour change : Corrective Action

4. Enforced compliance

- “iron fist” / application of full extent of the law



Integrated Food Regulatory Program Operationalization



New Zealand Example: Risk-based Programs Under the Food Act¹⁷

- ❑ Regulatory reform strives for **risk-based / outcome-based standards with rewards for performance**
- ❑ The business operator has primary responsibility for *demonstrating* safe and suitable food
- ❑ HACCP principles / Preventive Control Principles are paramount
- ❑ **The operator pays for performance-based verification**

Custom food control plan

High risk, individualised management
E.g. manufacturers of higher risk food
Flexible, supports innovation
Subject to evaluation

Template food control plan

High risk, common processes
E.g. restaurants, cafes, caterers, supermarkets, butchers
Written plan – but focus on ‘tell me what’

National programmes

3 levels, moderate to low risk
E.g. manufacturers of lower risk food, horticulture, retailers of prepacked food
‘Just tell me what to do’

- 
- A group of hands of various skin tones pressed together in a circle on sand, with the text "collaboration is everything" overlaid.



What is a Compliance and Enforcement Policy?

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Document that Specifies and Describes

Principles of Interventions

Steps in Implementing New Rules

Resources and Guidance



Always Observing the VADE Approach

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1. Voluntary compliance

- ☐ Achieved through education, engagement, communication

1. Assisted compliance

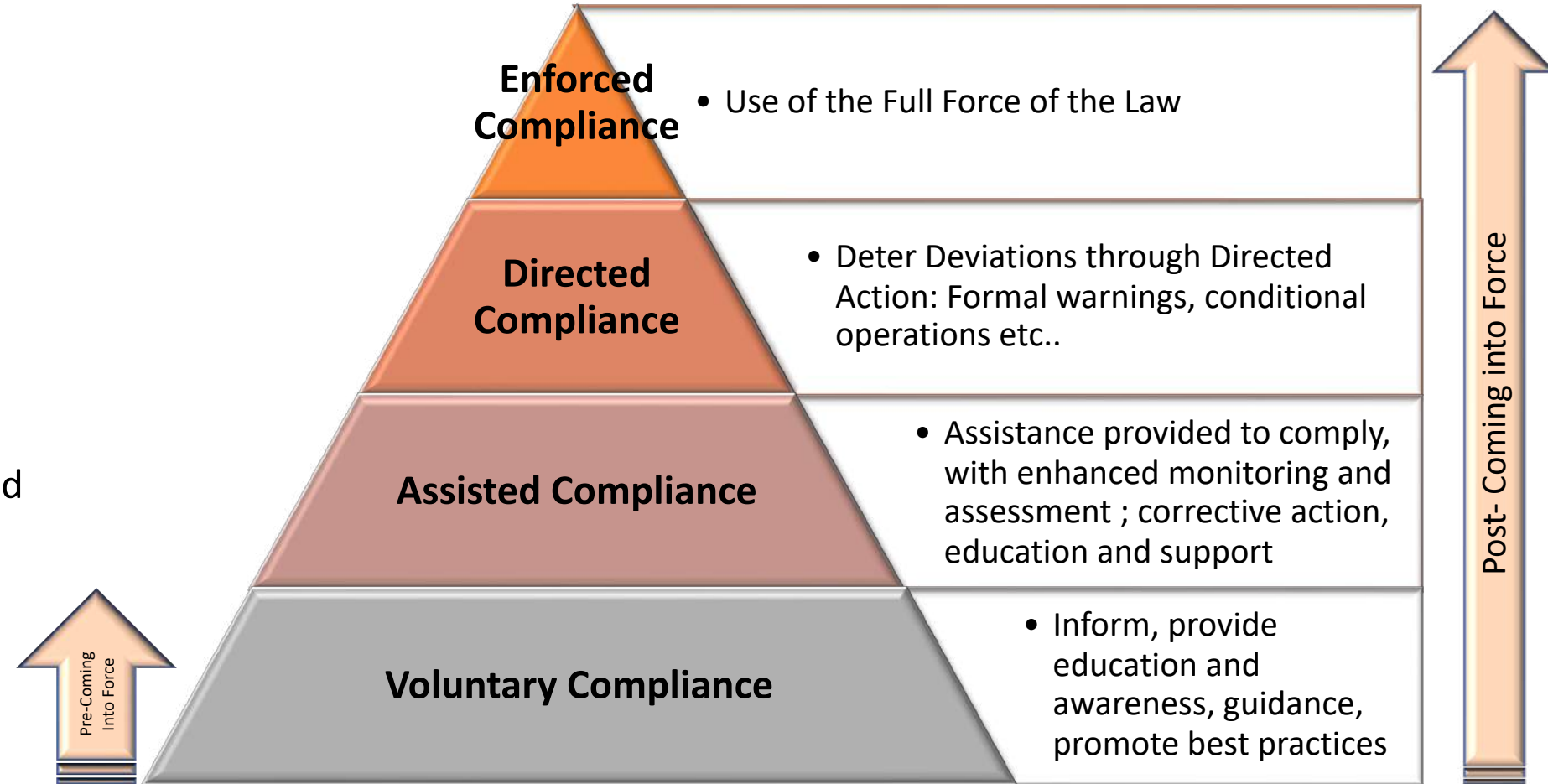
- ☐ interventions heavily reliant on monitoring, support to compliance

1. Directed compliance

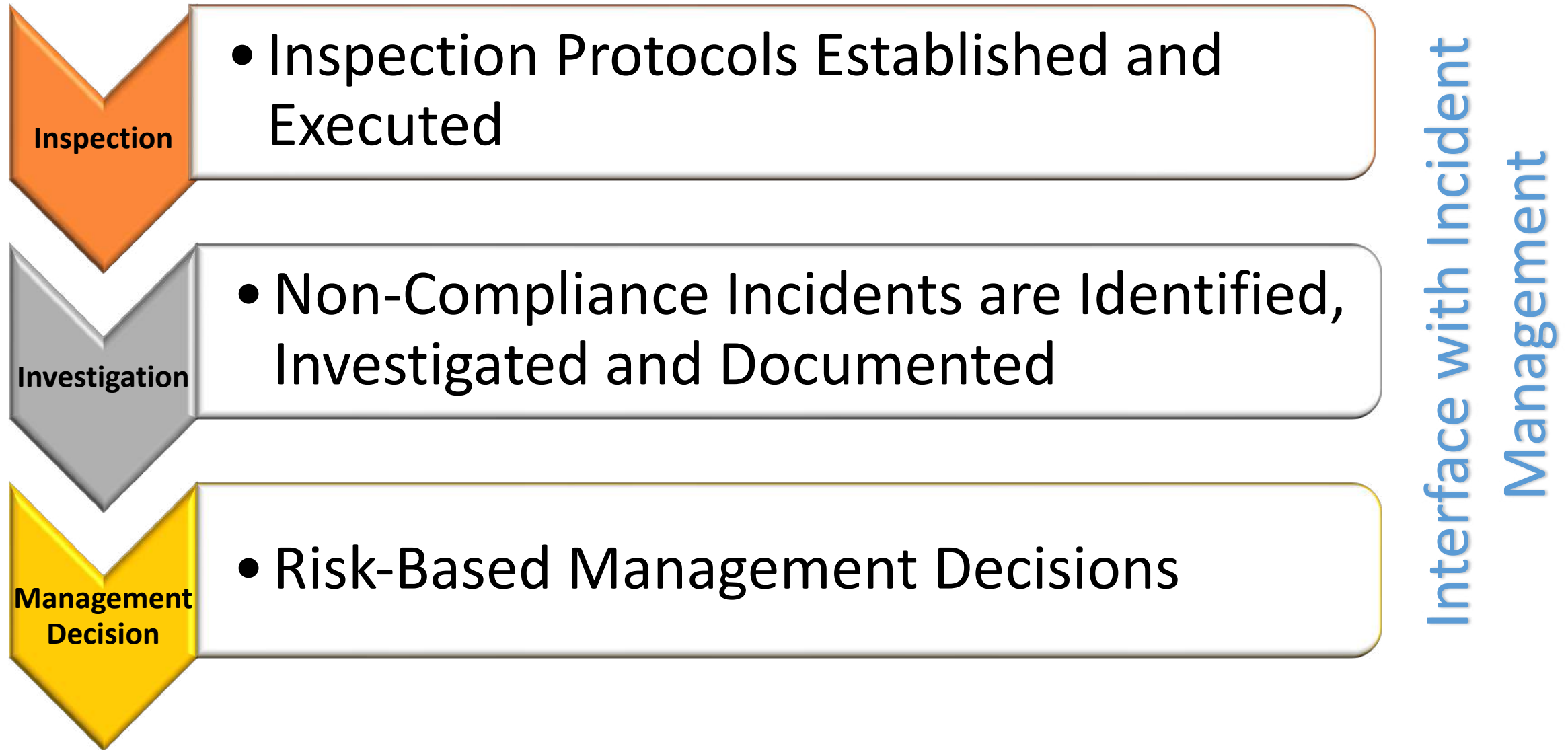
- ☐ range of tools to direct a desired behaviour change : Corrective Action

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- ☐ “iron fist” / application of full extent of the law



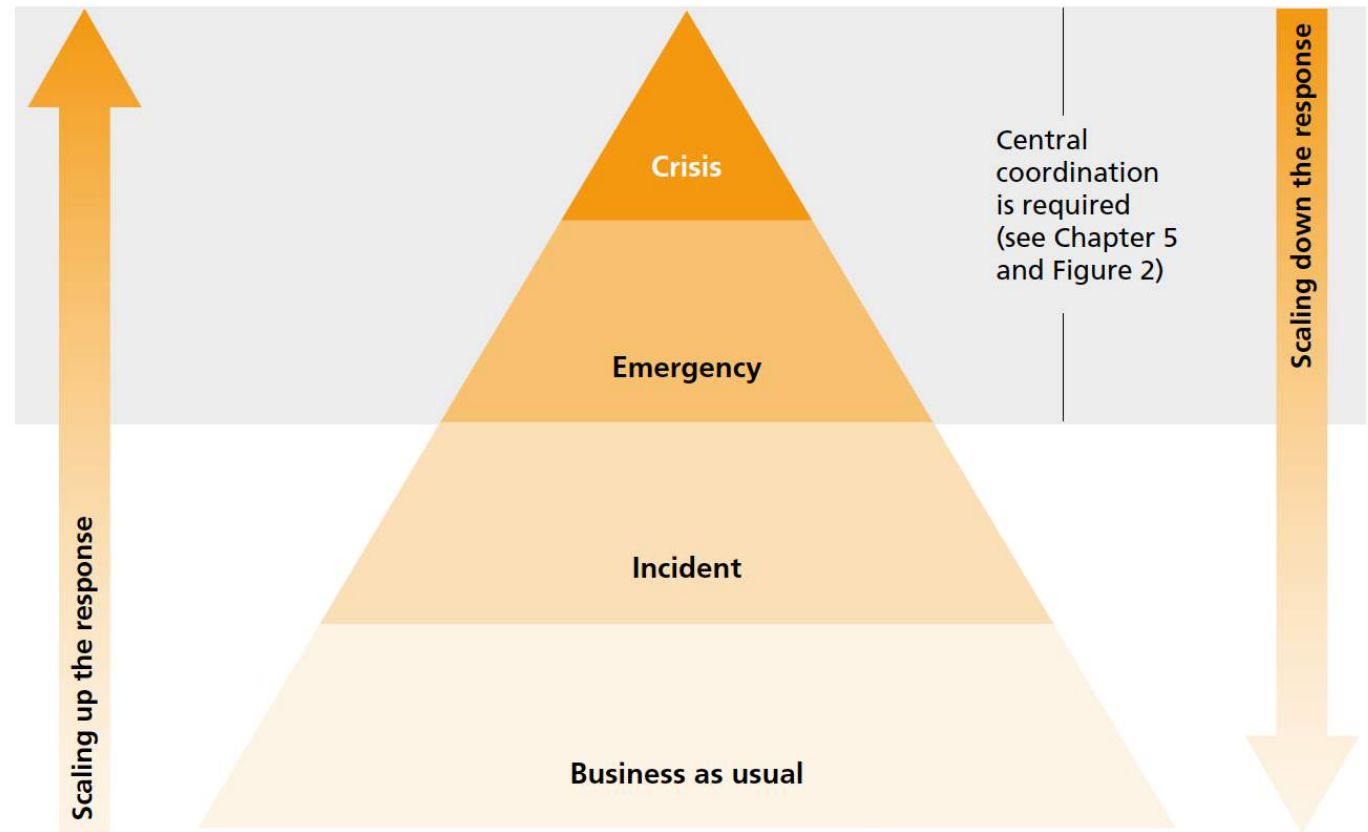
Structuring Incident Management and Enforcement Approach



Incident management:

refers to a series of measures enacted to manage the risk to consumers from unsafe / unsuitable food in a timely and effective manner.

Figure 1. Scalability of responses to food safety events

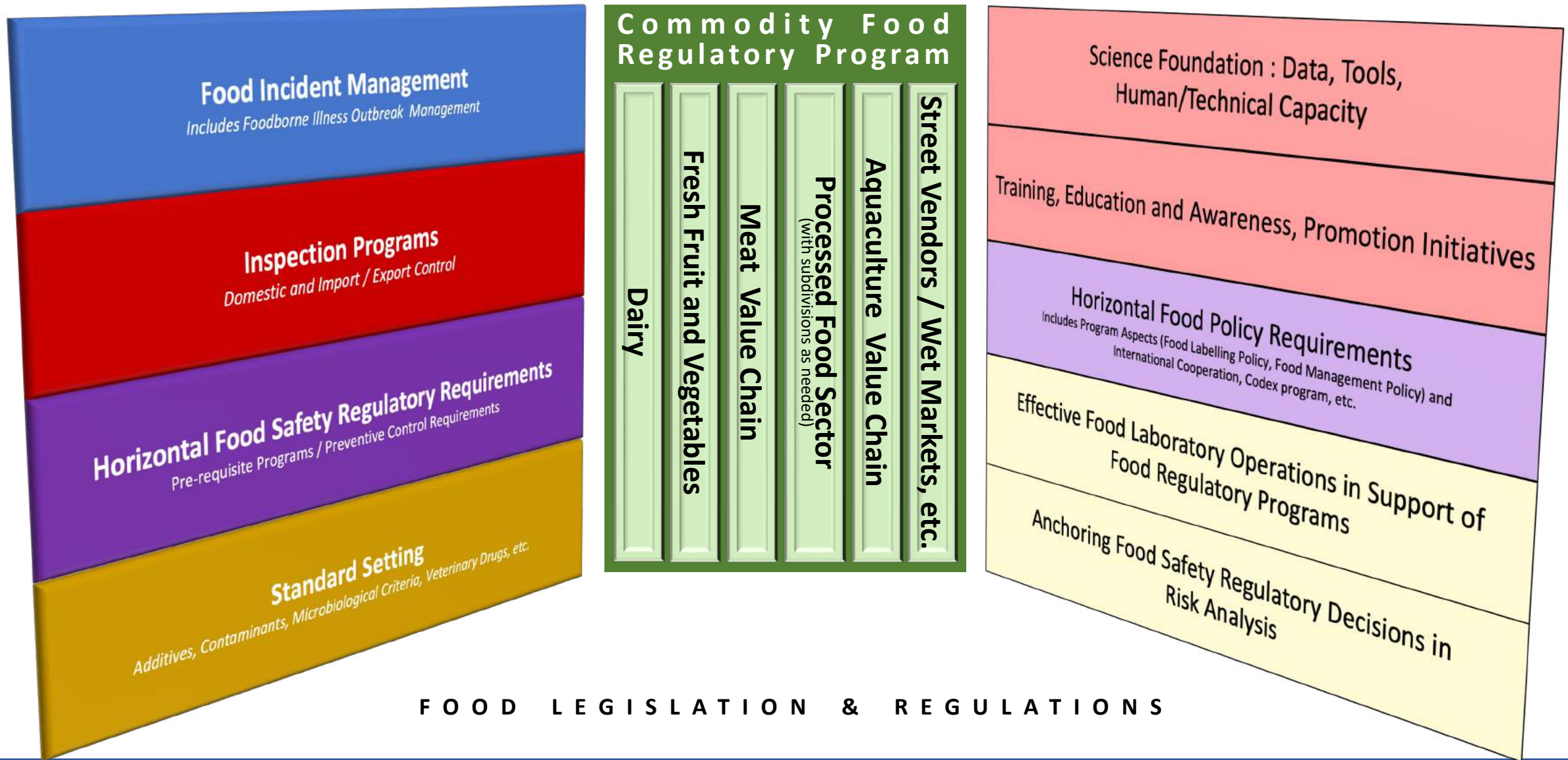


Source: FAO-WHO Framework for Developing National Food Safety
Emergency Response Plans

Development of an Incident Management Framework ²³



Building a Robust & Integrated Food Regulatory Operation



An Effective Food Safety Competent Authority:

- ❑ Anchors its actions and operations in a *robust legislative and regulatory framework* that enables it to “develop, establish, implement, maintain and enforce a national food control system”.
- ❑ Bases its food safety decisions on the application of the *Risk Analysis Principles*.
- ❑ Ensures effective *food regulatory operations* both for ***standard setting and compliance and enforcement***
- ❑ Is supported by a **focused:**
 - ***Scientific capacity for risk assessment*** and
 - ***Laboratory operations***.



A word cloud featuring the phrase "Thank You" in numerous languages. The words are arranged in a circular pattern, with "thank you" in the center in large blue letters. Other prominent words include "gracias" in red, "merci" in blue, "danke" in orange, and "teşekkür ederim" in green. Smaller words like "obrigado", "arigatō", "terima kasih", and "mochchakkeram" are also visible. The colors of the words vary, creating a vibrant and multicultural visual.