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RISK-BASED IMPORT CONTROL MANAGEMENT: PART 2

Workshop On Risk-Based Food Regulatory Interventions

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Overview

Unpacking Parameters Governing Risk-Based Food Import Control

Risk-Based Enforcement

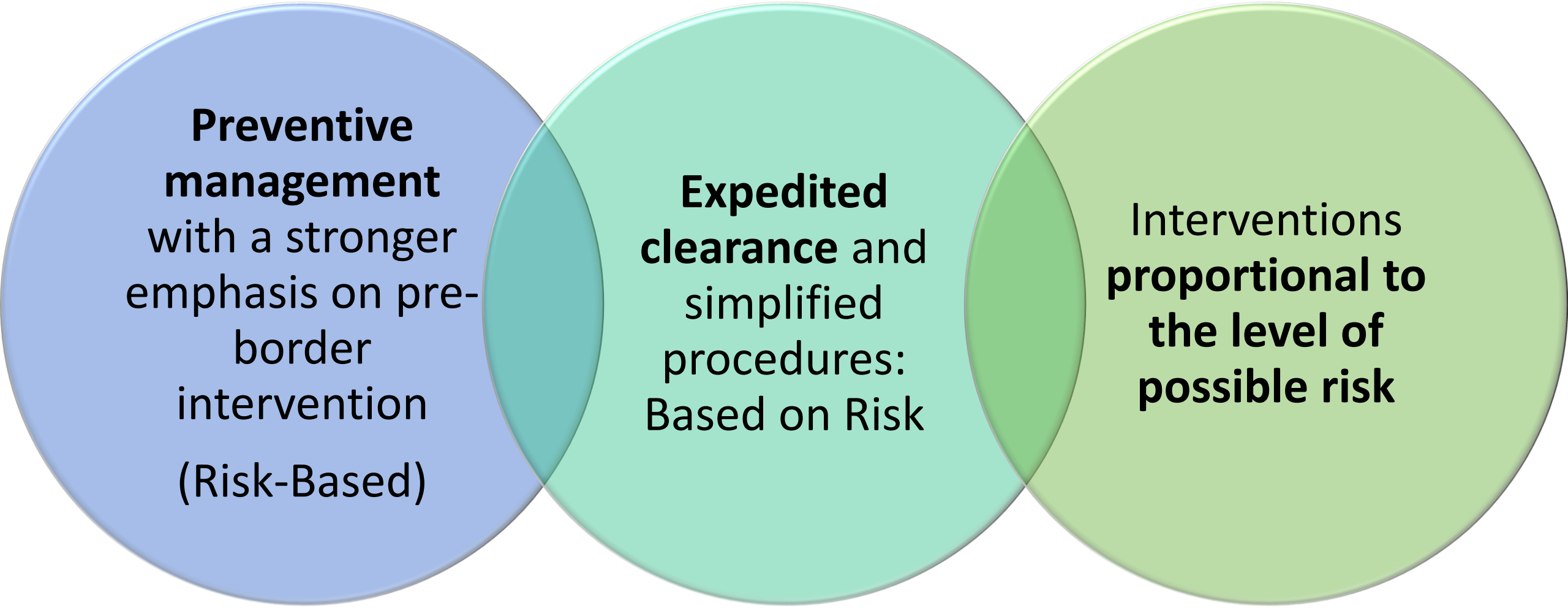
Objective of the Import Control Framework

To ensure optimal protection of consumers from risks associated with imported food, while enhancing the efficiency of import clearance at points of entry.

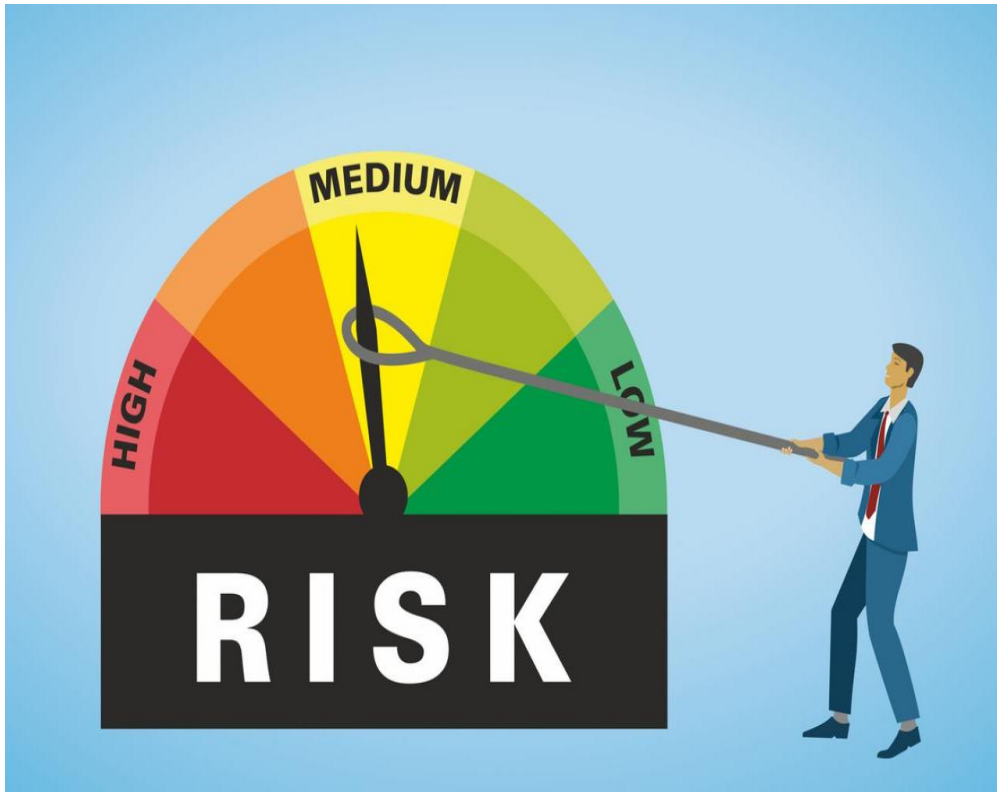
Codex Guidance

- ❑CXG-20-1995: Codex Principles for Import and Export Inspection and Certification
- ❑CXG-26-1997: Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems

Pillars of the Import Control Framework



Possible Parameters of Risk Ranking

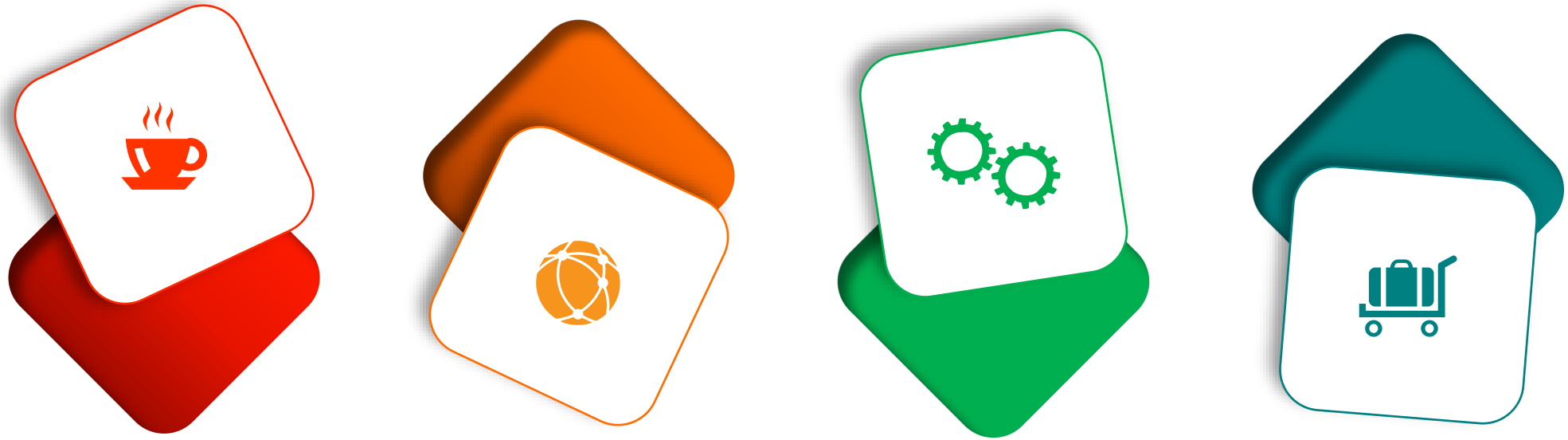


Risk Parameters in Food Import Control

- ❑Inherent risk of the traded commodity
- ❑Country of origin : robustness of regulatory system
- ❑Risk Related to Establishment : e.g., Attestation of compliance verification (certifications if any)
- ❑History of compliance of exporter /importer

IMPORT AND EXPORT RISK-BASED BORDER INSPECTION SYSTEM FOR FOOD COMMODITIES

Food Import Risk Algorithm



AgriFood Product

Country of Origin

Facility at Origin

Importer Performance

IMPORT RISK = PRODUCT RISK + COUNTRY RISK + Establishment/Facility RISK + IMPORTER RISK

Risk Based Interventions: Assigning Channels

No inspection required	Documental inspection	Physical inspection* With / without Sampling and testing

Food Import Risk Algorithm

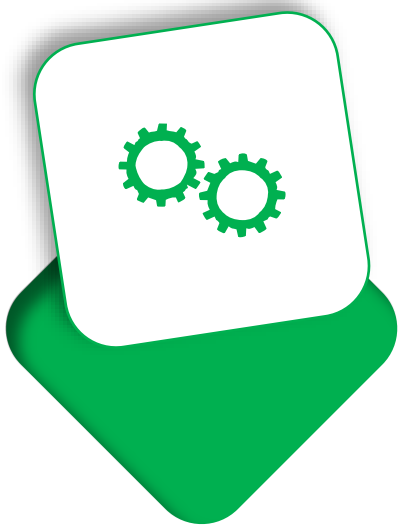
Dynamic Weights Applied

AgriFood Product

35%

Country of Origin

20%



Facility at Origin

20%

Importer Performance

25%

FINAL IMPORT RISK = W.PRODUCT RISK + W. COUNTRY RISK + W. FACILITY RISK + W. IMPORTER RISK

Proposed Parameters Governing Risk-Based Decision Making

Agri-food product	Country of origin	Product /Establishment	Importer performance
• Inherent food safety risk • Decision tree or risk matrix	• International alerts • Evaluation of the official inspection system • Trade agreements	• Official inspection at the country of origin • Third-party certification schemes	• Percentage of noncompliances (rejections, detentions)

IMPORT RISK = PRODUCT RISK + COUNTRY RISK + FACILITY RISK + IMPORTER RISK

Risk factor	Weight
Agri-food product	35%
Country of origin	20%
Compliance Verification and Certification	20%
Importer performance	25%

IMPORT RISK = PRODUCT RISK*W1 + COUNTRY RISK*W2 + FACILITY RISK*W3 + IMPORTER RISK *W4

Food Import Risk Algorithm

Country of Origin

Risk Related to the Country of Origin

1. International alerts (Infosan, Rasff, Import Refusals,…)
2. Assessment of the official inspection system
3. Trade agreements

Low (1) / Moderate (10) / High (100)

IMPORT RISK = PRODUCT RISK **+ COUNTRY RISK** + FACILITY RISK + IMPORTER RISK

Food Import Risk Algorithm

Risk Related to the Country of Origin

Country of Origin

Factor	Score
The country has been involved in more than one international alert in the last five years (i.e., INFOSAN, RASFF, FDA) The evaluation of the official inspection of the importing country is not favorable	100
The country has been involved in one international alert in the last five years The evaluation of the official inspection of the importing country is partially favorable	10
The country has not been involved in any international alert in the last 5 years The evaluation of the official inspection of the importing country is favorable	1

IMPORT RISK = PRODUCT RISK + COUNTRY RISK + FACILITY RISK + IMPORTER RISK

Food Import Risk Algorithm

Risk Related to the Country of Origin

Country of Origin

مركز سلامة وجودة الغذاء
FOOD SAFETY & QUALITY CENTER

Proposed Template for the Assessment of Food Regulatory Functions Exercised by an Exporting Country Competent Authority (ECCA) As Part of a Risk Based Food Import Control

The Food Safety and Quality Center (**FSQC**) of Oman is planning to practice a review of the **Performance of the food control functions** exercised by food competent authorities in exporting countries to Oman, to support its determination of the level of scrutiny to be exercised on food and agri-food products imported in the Sultanate of Oman.

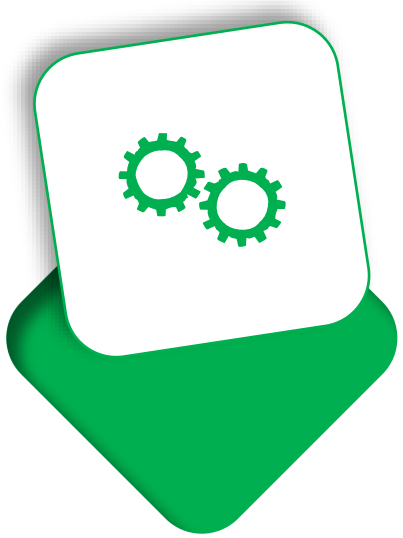
The assessment of the Exporting Country Competent Authority (ECCA) will be a key component of the risk-based approach to be followed by Oman in exercising food and agri-food important control.

This document supports the documentation of the performance of such food control functions.

The assessment is guided by international best practices as well as Codex guidance, in particular the "Principles and

IMPORT RISK = PRODUCT RISK + COUNTRY RISK + FACILITY RISK + IMPORTER RISK

Food Import Risk Algorithm



Facility
at Origin

Risk related to the Facility at Origin

1. Compliance with import requirements

2. Facility Attested to by the competent authority of the country of origin

3. Third-party certifications

Low (1) / Moderate (10) / High (100)

IMPORT RISK = PRODUCT RISK + COUNTRY RISK + **FACILITY RISK** + IMPORTER RISK

Food Import Risk Algorithm

Importer Performance

Risk related to the Importer

1. Percent of noncompliances:

Imports Rejections, Detentions

Low (1) / Moderate (10) / High (100)

IMPORT RISK = PRODUCT RISK + COUNTRY RISK + FACILITY RISK **+ IMPORTER RISK**

Food Import Risk Algorithm

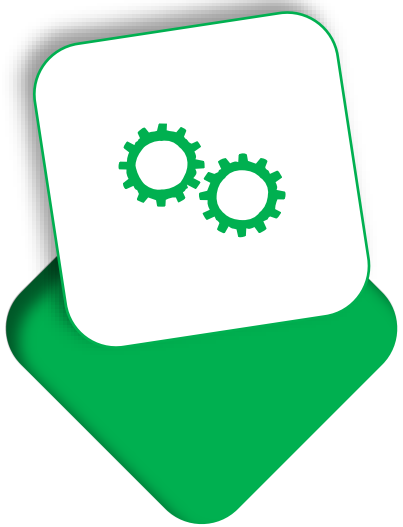
Dynamic Weights Applied

AgriFood Product

35%

Country of Origin

20%



Facility at Origin

20%

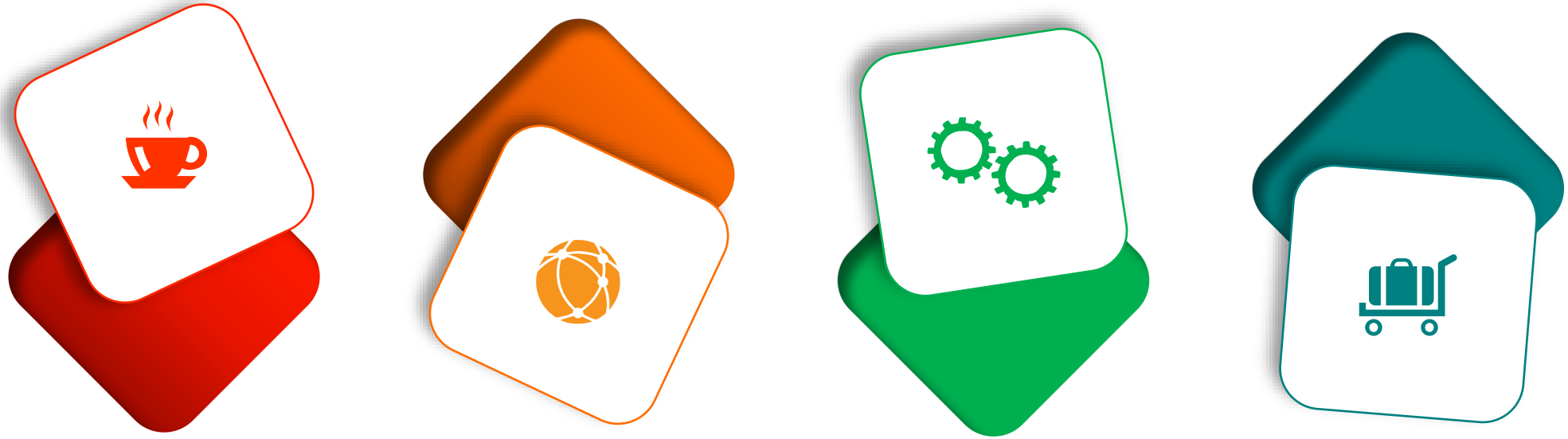
Importer Performance

25%

FINAL IMPORT RISK = W.PRODUCT RISK + W. COUNTRY RISK + W. FACILITY RISK + W. IMPORTER RISK

Food Import Risk Algorithm

SIMULATION



AgriFood Product PR=100

Country of Origin CR=1

Facility at Origin FR=1

Importer Performance 10

FINAL IMPORT RISK = (100*0.35) + (1*0.2)+ (1*0.2)+ (10*0.25) = 37.9

Risk Based Interventions: Assigning Channels

No inspection required	Documental inspection	Physical inspection* With / without Sampling and testing

Risk Levels Assigned to Each Imported Consignment IMPORT RISK = 0 TO 100

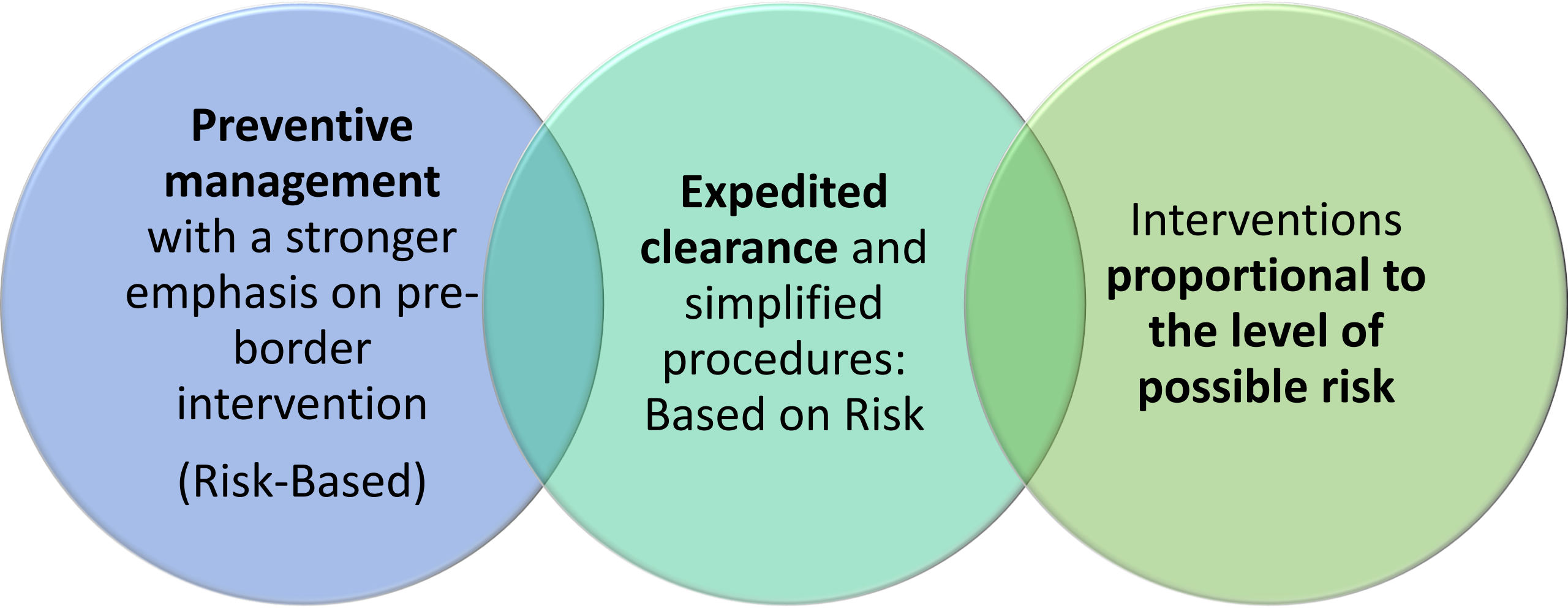
0 – 25 :
NO INSPECTION REQUIRED

26 – 50 :
DOCUMENTARY INSPECTION

51 – 75 :
DOCUMENTARY AND PHYSICAL INSPECTION

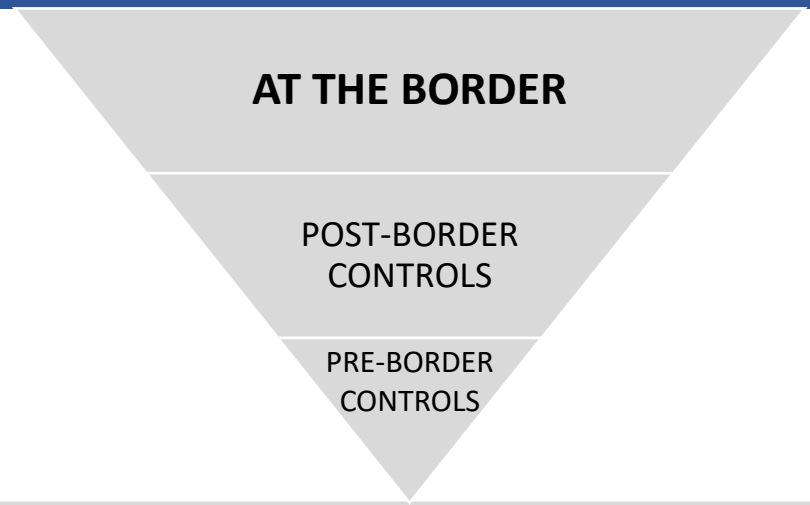
76 – 100 :
DOCUMENTARY, PHYSICAL INSPECTION AND LAB. TESTING

Pillars of the Import Control Framework

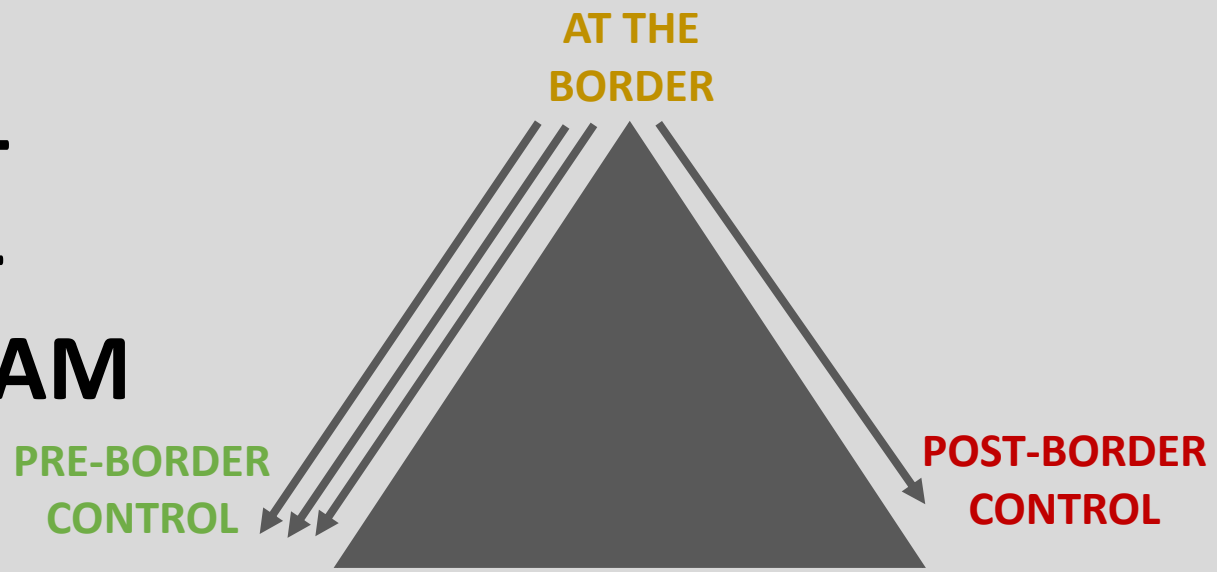


Transition to a Preventive Approach

Inherited import control system relied heavily on **AT THE BORDER** controls



Modern approach enhances **PRE-BORDER** and **Establishes a POST-BORDER MANAGEMENT PROGRAM**



Building the Framework

1. Legal framework
2. IT Infrastructure
3. Harmonization of tariff codes
4. Risk algorithm
5. Requirements imported food
6. Inspection intensity and frequency
7. Continuous improvement

Building the Framework

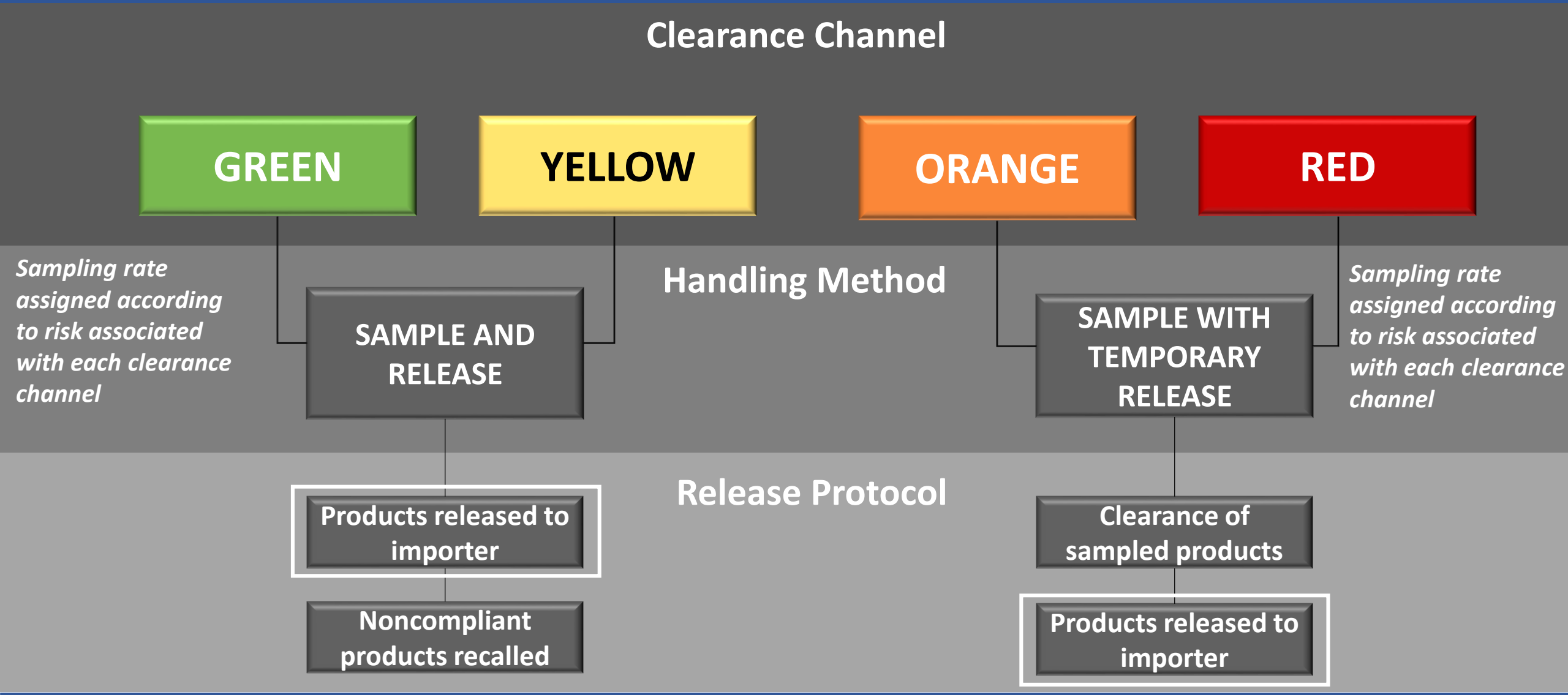
Strengthen Risk-Based pre-border oversight to reduce the hold-up period for at-border inspection of food consignments through:

Review of Performance of foreign food regulatory systems (targeting exports)

Pre-shipment certifications or attestations of compliance

Enhance importer practices

Policies for Product Clearance… Continued Improvement



Post-Border Interventions

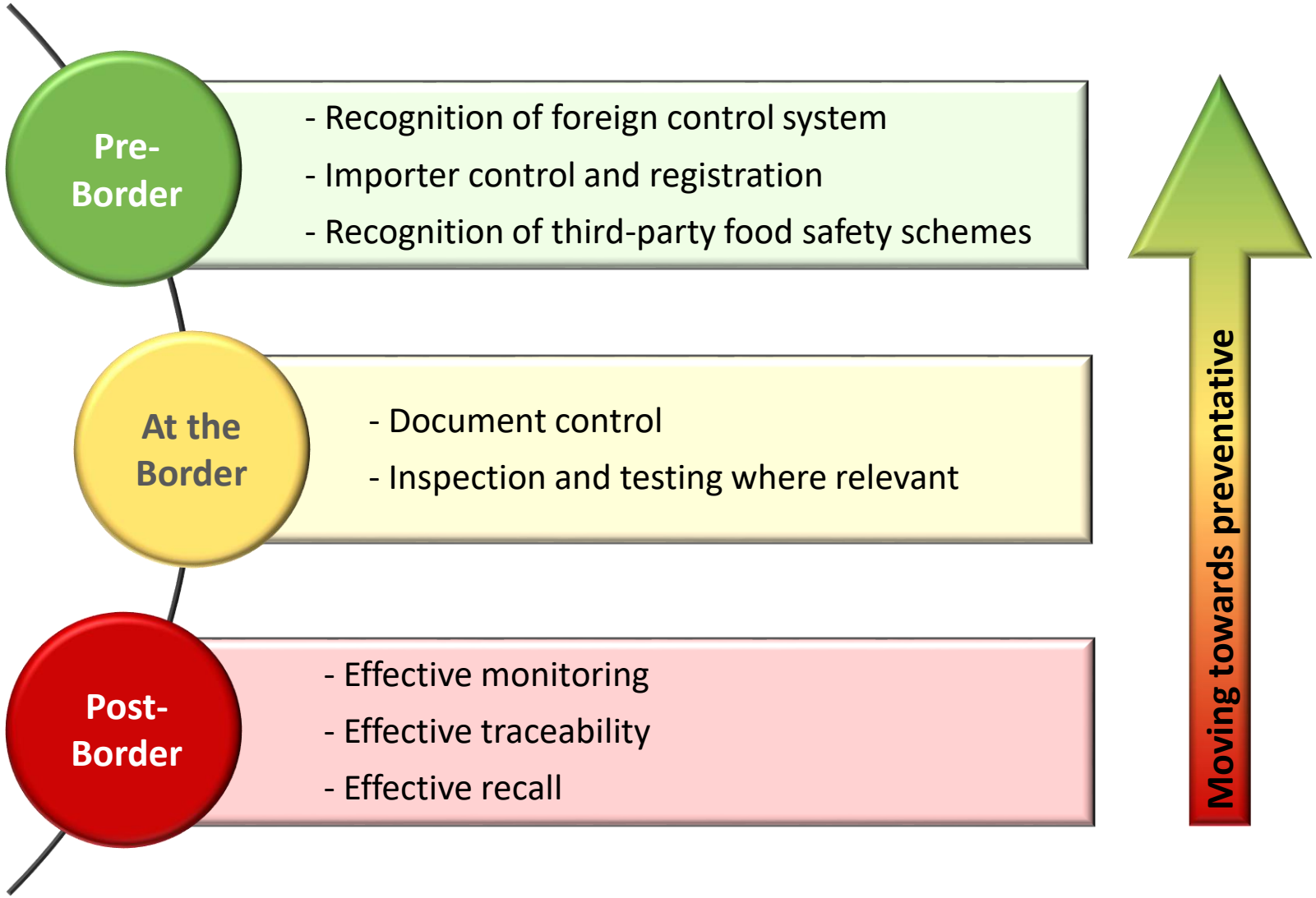
Targeted surveillance to ensure marketed food is safe

Managed recalls in case of identified hazards

Performance of importers to factor into future risk profiling

Data Driven Approach Towards Preventative Controls

Components of Import Control Oversight



Prescriptive vs. Risk-based Systems

Prescriptive Systems

Onus on Government to prove non-compliance

Flexible Risk-based Systems

Onus on business operator to demonstrate compliance

Operator pays for performance-based verification

Outcome-driven

Rewards performance

CCFICS Principles for Food Import & Export Certification

1995 - Principle 7

Inspection systems to ensure food safety should be designed and operated on the basis of

objective risk assessment appropriate to the circumstances

Reviewing Situations of Non-Compliance

Situation 1

A consignment of Chocolate Biscuits was randomly selected for thorough document inspection, which identified the presence of, in the products being imported, a food additive (an emulsifier) not approved in the GCC (and with no Codex Standard) but documented to be approved in the country of origin (Australia) and in several other countries, including the US, Canada and Japan.

What would be your course of action for enforcement?

Reviewing Situations of Non-Compliance

Situation 2

A consignment of Rice was randomly selected for sampling and testing, which led to the detection of banned substances, mainly pesticides at somewhat higher levels, as well as higher than usual levels of Arsenic, Lead and Cadmium.

What would be your course of action?


thank you
danke
謝謝
ngiyabonga
teşekkür ederim
gracias
рахмат
Баярлалаа
спасибо
mersi
kia ora
barka
welalin
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tapadh leat
faafetai lava
vinaka
спасибі
blagodaram
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misaotra
matondo
paldies
grazzi
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asante
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mercé
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감사합니다
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