Harnessing market drivers of food safety  
Stephen Mbithi

1. Overview

Food safety is a partnership: regulators, industry and consumers all need to play a role in ensuring safe food for all. Regulatory frameworks on food safety are necessary to define what is acceptable and to establish measures that monitor and promote compliance and that penalize non-compliance thus protecting the public from unsafe or fraudulent practice. Food is however delivered to consumers mainly through the market, not by Governments. Minimizing food safety risk requires that industry consistently implement good practice and this is more likely to be the case if consumers and the “market” drive good practice. Brand protection is a powerful incentive for stringent food safety management practices by well-established industries. In countries where small-scale producers and informal markets dominate, careful reflection is needed to harness market drivers of food safety.

2. Key considerations requiring the attention of decision-makers

2.1 Mainstreaming the role of consumers in driving food safety in the market

Consumer education plays a major role in creating conditions whereby consumers can drive improvement in food safety practices of suppliers. Through awareness and education, consumers are better placed to recognize and reward good hygiene practices of suppliers – several examples are available of how this has worked in the street food vending sector. Consumer education/awareness programmes also enable consumers to minimize food safety risk through their own food handling and preparation practices.

If much of the information that consumers receive is unreliable, then their role in driving food safety is compromised. It is necessary for governments and civil society groups to actively promote greater responsibility and accountability in information provision.

2.2 The risk of double standards and the imperative to protect the local population

Very often, there are clear drivers of food safety for food exports. In the absence of strong market drivers of food safety in domestic markets in many developing countries and without adequate attention on the part of national authorities, this could have the consequence of worsening the domestic food safety situation in various ways. For example, rejects from the export markets, can
find their way into domestic market channels, and national food control authorities may disproportionately use their resources to ensure the safety of exports, further weakening support for domestic food safety.

While two-tiered systems that simply leave large proportions of the domestic consumer base unprotected from food safety risk are not acceptable, it can be noted that countries may decide to regulate some segments of the domestic market differently. Examples are exemptions of some businesses from some HACCP requirements or planned approaches to the gradual application of new regulatory requirements. These decisions must be based on careful evaluation of risks and aim at constantly improving domestic food safety while giving small-scale operators an opportunity to strengthen their systems of food safety management. Such exceptions must however be based on demonstrable transparent processes that show diminished risk levels in domestic production systems when compared to other sources. It must also be possible that other suppliers, including from exporting countries, can benefit from these reduced controls once they demonstrate reduced risk levels.

2.3 Market tools for food safety compliance: private standards and testing requirements

In our current globalized market, private standards schemes are an important tool by which companies can seek to ensure food safety along their supply chains. For suppliers from countries with weak systems of enforcement, these schemes have been an important mechanism for enabling access to export and niche local markets. There is increasing use of these third party schemes by importing authorities and the issue of ‘Regulatory approaches to third party assurance schemes in food safety and fair practices in the food trade’ is currently under discussion in Codex and related Guidelines will be up for adoption at the next session of the Codex Alimentarius Commission in July 2019. It is important that the schemes do not marginalize national authorities in exporting countries but rather provide authorities with option to deploy additional tools and additional information than can serve to facilitate the achievement of food safety policy objectives in the country.

However, several of these private schemes are accompanied with unnecessary costs to producers especially on detailed inspection or testing requirements that, in some cases, do not enhance food safety. Private schemes usually work directly with retailers, and often small-scale producers do not have an opportunity to voice their concerns – they must simply conform, if they can. This “voicelessness” sometimes extends to the authorities where the private schemes operate. One would hope that the above-mentioned discussions in Codex will lead to an improvement in this situation in many developing countries.

Industry associations provide important forum for regulators and private sector in enhancing compliance on food safety. Representative associations may develop industry codes on food safety which incorporate regulatory requirements, and may organize joint inspections and certification processes that lower the cost of compliance at producer level. Industry associations may also develop local voluntary schemes which are harmonized with international schemes, but whose compliance conditions are adapted to local conditions. One such example is the development of KenyaGap by the Fresh Produce Exporters Association of Kenya (FPEAK), a local scheme that simplifies compliance conditions to GLOBALGAP, which in turn facilitates cost
effective compliance by small scale producers. Similarly, several other countries have developed simplified compliance procedures for various schemes.

2.4 Technical support to small scale businesses: helping businesses to compete

Businesses, especially small and medium scale enterprises require technical support on food safety, particularly on timely updates on emerging food safety requirements in the marketplace, and mechanisms of compliance. Often, small scale businesses are unable to recruit competent staff to manage food safety in their operations, and hence rely on centralized technical support at association level, coupled with extension services of official control agents in order to comply with food safety requirements. This is true in both developed and developing countries. In Belgium, Flandria provides extension services to farmers especially on compliance to standards, and ultimately assists with produce consolidation and marketing. This is the case in Kenya and Tanzania fresh produce and flower sectors, where farmers highly rely on their industry associations for capacity building on standards compliance.

There is a need, particularly in developing countries, to develop capacity building programs on food safety management at production and food processing establishments. Such capacity should include support for developing appropriate equipment and facilities, as well as training staff, required for compliance.

2.5 Strengthening the role of private sector associations in promoting public confidence in food safety

Food safety is a compliance issue which should be enforced by regulators at all times, and not a product differentiation or other marketing tools. Collaboration between private sector associations and regulators can be effective in facilitating compliance to food safety by producers and food business operators. Regulators are often keen to support private sector associations which are representative of majority of particular industry players and whose secretariats are professional and keen to undertake capacity development of their members. Such support may be in terms of policy encouraging all industry players to belong to associations in order to facilitate speedy communication on control measures and collaboration on capacity development. Such collaboration between the Government of Kenya and the fresh produce industry association has succeeded in facilitating compliance of about 150,000 small scale farmers. Similar collaborations have been implemented in the fisheries sector, and in fresh produce sectors in Ghana and Tanzania, which have greatly enhanced compliance of farmers to standards, especially on pesticides MRLs. Furthermore, well developed and transparent partnership between regulators and associations can lead to strong meso institutions, which are able to mobilize support from development partners for their activities.

3. Conclusion

Effective food safety regulatory systems are of fundamental importance in ensuring safety of food supplies, however, government action alone is not enough. Consumer awareness, and a supporting institutional framework that empower consumers, can create a positive dynamic within the market that promotes consistent attention to food safety. The provision of technical support services to small scale producers, by governmental or non-governmental institutions, can enable
them to improve their competitiveness on the market through improved safety and quality of products and improved efficiency of production.