

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Thirteenth Session, Kuala Lumpur, 17-20 September 2002

CAPACITY BUILDING FOR FOOD STANDARDS AND REGULATIONS

NEED FOR CAPACITY BUILDING IN FOOD STANDARDS AND REGULATIONS

1. A new international food and agriculture trade environment has emerged as a result of the Uruguay round of Multilateral Trade Negotiations and subsequent agreements on the application of Sanitary and Phytosanitary (SPS) measures and on Technical Barriers to Trade (TBT).
2. Members of the World Trade Organisation (WTO) are required to base their domestic technical regulations or standards on standards developed by international organisations. These organisations include, the Joint FAO/WHO Codex Alimentarius Commission for food safety; the Office International des Epizooties (OIE) for animal health; and the International Plant Protection Convention (IPPC) for plant health..
3. The evolution of the conditions for international trade in relation to food and agriculture affects numerous cross-cutting sectors in every country, including human, animal and plant health, environmental welfare and economic development. The regulatory systems and infrastructure needed to conform to the new international trading environment are weak in many developing countries. This puts these countries at a competitive disadvantage in the international trade arena and constitutes a major limitation to the effective participation of these countries in the discussions and decisions taken at the level of international standardisation bodies.
4. Both the SPS (article 9) Agreement and the TBT (article 12) Agreement make specific reference to increasing the capacity of developing countries and remaining cognisant of the unique needs of developing country Members. Specifically section 12.3 of the TBT¹ states "Members shall, in the preparation and application of technical regulations, standards and conformity assessment procedures, take account of the special development, financial and trade needs of developing country Members, with a view to ensuring that such technical regulations, standards and conformity assessment procedures do not create unnecessary obstacles to exports from developing country Members". Reinforcing these views, the Executive Heads of FAO, WHO,

¹ World Trade Organisation: *Agreement on Technical Barriers to Trade*, Article 12

WTO, WB and OIE, in a joint statement issued at the occasion of the WTO Ministerial Meeting held in Doha in November 2001, expressed their commitment to strengthening the capacity of developing countries to meet the requirements of the SPS agreement.

5. At the 23rd Session of the Codex Commission (July 1999), FAO and WHO were called upon to strengthen capacity building activities, particularly in relation to risk analysis capabilities in developing countries.

6. In keeping with these mandates, FAO and WHO engaged in diverse capacity building activities designed to assist developing countries in improving their food safety and plant and animal health systems. Together with international organisations, national governments, international and regional financial institutions and NGOs, various capacity building and technical assistance initiatives have been undertaken. This report will focus on capacity building activities in the region undertaken in part or in whole by FAO and WHO during the period since the last Regional Codex Co-ordinating Committee meeting (23-26 November 1999). It also provides a brief on regional or national capacity building activities that are in the process of being approved.

RECENT AND ONGOING CAPACITY BUILDING ACTIVITIES

7. In order to support countries desiring to harmonise their national standards with those of Codex and comply fully with international trade regulations, FAO and WHO engaged in a variety of capacity building activities. While the activities and strategies differ and are tailored to specific regions and countries, the overall objective is to support and strengthen national food control systems. This is often done by providing technical assistance in reviewing and analysing the institutional set up for food control and evaluating its effectiveness, identifying main weaknesses, and formulating recommendations and proposals for the establishment of technically sound food control systems which are harmonised with current international standards. Specific activities falling within the realm of capacity building include, training of food control officials and technical staff (food control managers, food inspectors, food analysts) in the form of seminars, workshops and study tours to broaden in-country skills and increase the ability of local governments to implement comprehensive food control systems, enhancement of food control laboratory capabilities, preparation of training manuals and guidelines, support in establishing and strengthening National Codex Committees, policy advice and establishment of regulatory frameworks. The remainder of the report will focus on these activities, occurring at global, regional and national level.

Global Activities

International Workshops

8. An *International Workshop on Food Safety Management in Developing Countries* was organised and sponsored jointly by Centre de Coopération Internationale en Recherche Agronomique pour le Développement (CIRAD) and FAO, with financial support from Languedoc-Roussillon region. The workshop was held in Montpellier, France from 10-14 December 2000. Fifty-one participants (including participants from Asia) representing twenty-two countries benefited from this event. Topics such as the impact of the SPS and TBT agreements in developing countries, and risks of undesired substances in foods and feed were presented and discussed. Working groups met to discuss five food safety and development priority areas: risk assessment, food safety regulatory systems, quality assurance, developmental finance and research needs. The working groups presented a series of recommendations which were then discussed during the plenary session. The report may be obtained from CIRAD on request.

9. FAO and WHO jointly convened a *Global Forum of Food Safety Regulators in Marrakech from 28-30 January 2002* to bring together food safety regulators from every region of the world to discuss and share experiences on food safety issues that are of global concern. Forum discussions were based on the principle that regulations must be science-based and built on risk assessment as appropriate to circumstance. These discussions demonstrated a global recognition that actions need to be taken throughout the food production chain from farm and fishing boat to the consumer. Participants agreed that actions need to be taken urgently to develop the capacity in particular in developing countries to assure the safety of the food supply to their populations. Building such capacities will also assist in strengthening exports, improving public health and reducing poverty.

10. An *International Workshop on the Application of HACCP Principles in the Prevention and Control of Mycotoxins* was held in Greenwich, UK from 17-28 June, 2002. The workshop was co-sponsored by FAO and the National Resources Institute (NRI). The purpose of the workshop was to present and train the participants on the use of the Manual and the application of the HACCP system in Mycotoxin prevention and control. The manual was written jointly by FAO and the International Atomic Energy Agency (IAEA) in collaboration with NRI. The manual was published in 2001 by FAO as Food and Nutrition Paper 73². It can be obtained from FAO on request.

Global Projects

11. A global project for the *Enhancement of Coffee Quality through Prevention of Mould Formation* was started in December 2000, and is due to end in December 2004. This project is being carried out in Brazil, Colombia, Ivory Coast, India, Indonesia, Kenya, and Uganda, with collaboration from Centre de Coopération Internationale en Recherche Agronomique pour le Développement (CIRAD) and Institute for Scientific Information on Coffee (ISIC) and the University of Surrey, U.K.. The project has received funding from the Common Fund for Commodities and the Dutch Government. An additionally funded component for training and dissemination of best practice in ochratoxin A (OTA) control in Ecuador has also been incorporated.

12. The project approach emphasises capacity-building in coffee-producing countries, with the aim of formulating codes of practice for the coffee industry. Key initial activities under the project involve defining mould formation mechanisms, identifying critical control points, evaluating optimal drying conditions, and developing the necessary tools (e.g. IPSM and HACCP) to control and monitor both mould formation and OTA production. Specifically, the project builds capacity at national level within the industry and responsible government agencies in:

- The application of internationally-agreed principles of food hygiene and a HACCP-based approach to food safety throughout the coffee production and processing chain
- The analytical capacity and capability required to support national programmes for prevention and control of OTA- contamination of coffee

13. In 1999-2001, FAO formulated and implemented an *Umbrella Programme for Training on Uruguay Round and Future Negotiations on Agriculture*. The first phase of the programme included the implementation of 14 sub-regional training courses conducted in Africa (4 courses); Asia (3 courses); Near East (2 courses); Europe (2 courses); and Latin America (3 courses). The programme was co-financed by FAO, European Union and several donor countries. It was designed taking into account the complementarities and synergies of the countries involved in the programme, including the more general training on multilateral trade conducted by other international institutions (notably WTO, WB, ITC, UNCTAD, etc). The project aimed at improving understanding of existing WTO agreements to enable countries to more fully participate in the negotiation process and debate issues of special concern to the region. Topics which were covered during training included various UR agreements concerning agriculture, such as SPS measures, Technical Barriers to Trade and Trade related Intellectual Property Rights.

14. Phase one training for East and Southeast Asian Countries took place in Kathmandu, Nepal, November 2000 and Los Baños, Philippines, December 2000 and included participants from Cambodia, Indonesia, People's Republic of Korea, Lao People's Democratic Republic, Malaysia, Mongolia, Philippines, Republic of Korea, Thailand and Vietnam.

15. A second phase of training has recently been formulated and will be submitted to donors for financing..

Global Initiatives

16. *FAO Trust Fund for Food Security and Food Safety* – This fund was established by FAO as an important source of demand-driven funding to supplement the present trust funds, which support key components of the Organization's Field Programme³. The initial funding target is of US\$500 million. The

² International Atomic Energy Agency (IAEA) and FAO, 2001. *Manual on the Application of the HACCP system in mycotoxin prevention and control*. FAO Food and Nutrition Paper 73, Rome, 2001.

³ http://www.fao.org/docrep/003/y1262e/y1262e00.htm#P5_1

projects to be funded from this Trust Fund will assist Member Governments in initiating, strengthening, accelerating and expanding activities in the following two areas: *Food Security and Emergency Prevention of Transboundary Pests and Diseases of Animals and Plants*.

17. Transboundary animal diseases are epizootic diseases that are highly contagious or transmissible with the potential for very serious and rapid spread, irrespective of national borders. These diseases are of serious socio-economic or public health consequence and can be a major constraint to international trade of animals and animal products. This can have an adverse effect on the food security situation in the countries concerned and also on the food safety of consumers around the world. The same is true for locusts and other migratory pests that can fly over great distances and threaten crops hundreds or thousands of kilometres away from their places of origin.

18. Through its ongoing *Emergency Prevention System (EMPRES)*, approved by the Council at its 106th Session, FAO is adopting a new approach to an old problem by emphasizing early warning, early reaction and networking of research capacities to ensure the use of more effective and environment-friendly methods. The programme is focusing on strengthening existing surveillance and control in affected countries.

19. The *FAO Integrated Programme for Building Capacity for Biotechnology, Food Quality and Safety, and Phyto- and Zoosanitary Standards* has been developed for consideration by potential donors to address the needs of developing and transition countries in the establishment or enhancement of appropriate policies, institutions and human resources concerned with biotechnology and sanitary measures in the context of food and agriculture, and in connection with trade related and environmental issues. The food safety component of this Programme valued at US\$56.5 million covers such areas as: guidance for decision makers, regulatory and legal aspects, institutional strengthening at regional and national levels, human resource development, improvement of laboratory capabilities, and management of food control programmes.

20. *Joint FAO/WHO/OIE/WTO/WB Framework for Capacity Building in SPS-related Matters*. This initiative was launched by the 5 organizations following the joint Statement made by their respective Executive Heads in November 2001 in favour of increased capacity building efforts for developing countries to enhance their ability to fully participate in the work and decision making process of international standards setting bodies. A draft framework has been prepared by FAO and is currently under active discussion by the concerned units within the organizations.

Regional Activities

Conferences and Workshops

21. The *South Asian Conference on Food Safety* was organised jointly by FAO and ILSI and took place from 11-13 December 2000 in Delhi. This was the third conference in the series on food safety issues for the South Asian region. Ninety delegates attended the conference from seven member countries of SAARC. The overall objectives of the conference were to review the current food safety and food trade environment in the SAARC region, to review progress toward harmonisation of food regulations with international standards, to identify challenges faced in the support of food safety activities, and to discuss issues related to risk analysis. Conference participants agreed upon several concrete recommendations, including, nomination of a focal point on food control matters among SAARC countries and harmonisation of food safety measures and food control and import inspection and certification procedures using the Codex standards, guidelines and recommendations framework. Responsibility for reviewing existing food laws and regulations and identifying deviations from international standards was divided into different food commodities, with each country taking responsibility for a certain set of commodities.

22. A sub-regional *Food Safety Seminar for Central Asian Republics* was held in 2001 in Tashkent, Uzbekistan. The seminar, sponsored by FAO, WHO and ILSI was attended by over 30 participants from Central Asia. The main objective of the training was to provide participants with a framework for understanding food safety including, food safety systems, risk analysis principles and to discuss regional aspects of legislation, enforcement, management and inter-ministerial co-operation.

23. A *Workshop on Microbiological Risk Analysis (MRA)* was held in Beijing 10-11 May 2002. The workshop was jointly sponsored by FAO and ILSI and organised locally by the ILSI focal point in China and the

Ministry of Health. A total of one hundred and fifty participants from Asia attended the workshop. WHO sponsored the participation of eleven participants from Asian countries. The objective of the workshop was to familiarise participants with the process of microbiological risk assessment and its use within the risk analysis framework. The conclusions of the workshop were that the workshop had provided a good introduction to microbiological risk assessment, however participants expressed the need for further training, including capacity building in the area of data collection useful for MRA. Participants took advantage of the opportunity to discuss ideas with others working in the field of food safety and felt that this was a good opportunity to increase collaboration between different sectors.

24. FAO and the National Food Processors Association (NFPA) jointly organised a *Workshop on Food Safety in Bangkok*, Thailand in 2002. Ninety participants attended the workshop. The overall objective of the workshop was to strengthen country level initiatives and partnership with food processing industries. The seminar emphasised the use of science as the foundation of effective food control programmes. Aspects of successful national food control programmes were discussed using operational examples from selected countries of the Asian region, to provide practical insight to participants who are involved in upgrading their own national food safety programmes. The seminar also analysed key food safety issues that are currently in international focus, with presentations from leading international experts. The topics reviewed were highly relevant to all countries, with a particular focus on issues of concern to developing countries.

A Regional Strategy adopted and implemented by WHO and its Member States

25. The 52nd session of the Regional Committee recognized food safety as a significant public health issue and endorsed a Regional Strategy for Food Safety. The Regional Strategy commits WHO to supporting advocacy and awareness-raising efforts as keys to increasing political commitment to national food safety efforts. Consequently, WHO activities have included support for mass media campaigns in Mongolia and Viet Nam; World Food Day activities focused on food safety in Papua New Guinea; the development of advocacy materials in Papua New Guinea and Cambodia; and national food safety seminars in Kiribati, the Solomon Islands and Papua New Guinea. These activities followed on from the workshop on operational plans of action for food safety in the Western Pacific conducted in Manila, Philippines in November 2000. That workshop brought together health and non-health sector personnel from 14 countries to better recognize the need for multi-sectoral planning and program implementation. Policies, plans of action and legislation are key elements of any effective national food safety program. WHO has collaborated with the Government of Mongolia to develop a national plan of action for food security, safety and nutrition, with Viet Nam on the need for policy development and with Cambodia on the need for a multi-sector plan of action. In the latter example, numerous one-day seminars with different ministries followed a multi-sector workshop on drafting of a national plan of action. Food hygiene and environmental health regulations were reviewed and guidance provided to Palau, decisions and circulars were drafted in Viet Nam and food law, hygiene regulations and food recall guidelines drafted in Vanuatu. The Organization also continued to provide guidance to Ministry of Health, Fiji, on a proposed Food Safety Bill and food recall guidelines.

26. Countries were also encouraged, through the provision of technical support, to strengthen their participation in the work of Codex. Such activities were undertaken in Cambodia and Fiji and, collaboratively with FAO, in other Pacific island countries. In addition, WHO provided training in China on WTO and the SPS and TBT agreements.

27. The importance of national food safety programs being founded on sound science was clearly reinforced at the FAO/WHO Global Forum of Food Safety Regulators in Morocco. In this regard, WHO has placed emphasis on strengthening the capacity of Member States to establish food safety programs that are risk-based. Analytical capacity was strengthened through supply of equipment in China and laboratory quality assurance training in Viet Nam. WHO has also supported targeted contaminant monitoring workshops and monitoring studies of soy and oyster sauce products in Fiji; various foods, including canned fish, in Papua New Guinea; drinking water and selected foods in Nauru; and food for school children in Cambodia. Furthermore, WHO collaborated with ASEAN and ILSI to increase understanding of risk assessment principles and applications amongst health and non-health sector food safety enforcement officers.

28. Collaborative work with the Malaysian Agriculture and Research Development Institute (MARDI) and the Australia New Zealand Food Authority (ANZFA) to enhance training in good hygienic practice and the

Hazard Analysis Critical Control Point (HACCP) approach was also initiated. This work involves the development of training materials for use with small and/or less-developed businesses in Malaysia, Brunei Darussalam and Viet Nam. In addition, training courses were conducted on HACCP applied to the meat and dairy industries for health authorities in China. Also, existing WHO/ICD⁴ HACCP training materials were translated into Mongolian and Laotian. With the support of the Government of the Republic of Korea, health authorities in Mongolia were subsequently trained in the introduction of HACCP to industry and HACCP guidance documents for industry were developed.

29. Inspectors were trained in inspection procedures that address basic hygiene issues while also encouraging inspectors to employ a HACCP-based approach. To facilitate the approach a template inspection manual was drafted and trialled in both Cambodia and Viet Nam. The manual will enable health authorities throughout these countries to undertake inspections with greater guidance from national authorities. Inspectors were also trained in safety assessment of foods derived from biotechnology in U.S.A, in environmental health and food safety in Fiji, and in import inspection in Malaysia. Fellowships were provided for Korean regulators for food safety inspection systems in the United Kingdom and in China for inspectors from Viet Nam. Analytical capacity was strengthened through the provision of study fellowships for analysts from China and Mongolia.

30. Effective risk communication, education and training are also essential elements of national food safety programs. A program of training trainers of community health workers in food safety was initiated based on an OPEC Fund for International Development/WHO package called *Basic food safety for health workers*. In addition, information, education and communication materials on food safety were supported in China, Cambodia and Lao PDR.

31. In the period under review, WHO continued to support capacity building at the local level through implementation of healthy marketplace initiatives. In Cambodia, Lao PDR, Mongolia and Viet Nam, the healthy marketplace initiative was supported through technical support provided by WHO in-country technical officers, the development of a healthy marketplace video in Viet Nam, several consultancies, the provision of seed money for infrastructure developments, participatory workshops to develop market management plans and the provision of support to develop appropriate information, education and communication materials.

WHO, ADB and the Government of Viet Nam working together for improved food safety

32. In July 2001, the Asian Development Bank [ADB] contracted with the WHO Western Pacific Regional Office to provide technical support for a Technical Assistance Agreement between the ADB and the Government of Viet Nam, focusing on strengthening the functions and capabilities of the Viet Nam Food Administration (Ministry of Health). The Agreement involves almost half a million US dollars in support over a 13-month period.

33. The current collaborative programme among ADB, WHO and the Government involves a four-pronged approach addressing:

- Policy and legislation;
- Laboratory facilities and operations;
- Food-borne disease surveillance; and
- Information, education, communication and training.

34. WHO is working with the Food Administration to develop food safety policy and legislation; to enhance food-borne disease surveillance through active laboratory-based surveillance and sentinel site surveillance; to identify an inventory of essential analytical equipment; to facilitate the creation of a network of food laboratories and trained analysts; and to develop national capacity in education and communication about food safety. WHO has also extended the benefits obtained from this programme by networking the programme with its own regular budget activities and with activities being undertaken collaboratively with the Australia New Zealand Food

⁴ ICD = Industry Council for Development

Authority (ANZFA). In the recent FAO/WHO Global Forum of Food Safety Regulators, conducted in Morocco, 28-30 January 2002, this Regional initiative was pointed to as a possible model for future joint projects in the area of food safety. It combines the technical expertise of WHO and national food safety agencies active in the area with funding from a development bank (ADB) to facilitate the building of capacity in a priority area of public health concern.

National Activities

Field Projects

35. Under its Technical Cooperation Programme (TCP), FAO has implemented numerous projects on critical aspects of food control in many Asian countries. FAO/TCP is designed to assist Member Nations in solving their most pressing development needs. In the field of food safety these include: strengthening of national food control systems, enhancing laboratory facilities and analysis capacities and improving the ability of member countries to comply with new trade regulations.

36. A TCP project on Strengthening Food Control and Codex began in Bhutan in June 2000 and is scheduled for completion September 2002. The project is oriented toward the reorganisation of the food control administration in the country. A new food act has been proposed and the inspection service has been centralised. Some activities are still ongoing for upgrading the chemical and microbiological food laboratories.

37. A TCP project for Strengthening the National Codex Committee of Cambodia began in September 1999 and was completed in December 2000. The overall goal of this project was to improve consumer's protection in Cambodia and Cambodia's food export potential by strengthening food quality and safety control. The project anticipated achieving these objectives by training food inspection officials in each of the following areas: (i) developing overall food quality and food safety systems using international criteria for the establishment of maximum permissible limits for contaminants, and food additives levels in foods; and (ii) general principles for food import and export inspection and certification, including information exchange in food control emergency situations. A national Codex Committee was established and given guidance on their responsibilities, programme of activities and operating procedures. Study tours were provided for 2 senior members of the national Codex Committee to the Secretariat of the Codex Alimentarius Commission, in order to familiarise them with the work of the Commission and its current and future directions.

38. A TCP project on strengthening control of residues in meat and derived products began in China in May 2001 and is scheduled for completion end 2002. The project is justified by the strong interest of the country to comply with the requirements of the WTO membership. The country received assistance in training and provision of laboratory equipment to apply reference methods in the control of veterinary drug residues and pesticides residues in meat and derived products. The training was conducted in the country and at the FAO/IAEA Reference Centre for Food and Pesticide Control.

39. A TCP project in India was initiated in November 2000 and is scheduled for completion end 2002. The objective of the project is to strengthen the National Codex Committee and the National Codex Contact Point to ensure the effective conduct of Codex work at a national level and enhanced participation at international level. Activities include a series of training for government professionals, industry and consumer groups on strengthening food safety and quality systems in India through the National Codex Committee. A prioritised action plan for harmonisation of national food standards and regulations with CAC recommendations is an expected output of the project.

40. A TCP project for Mongolia to Strengthen Food Import Control has just received approval for commencement June 2002 with an anticipated completion date of January 2004. The objectives of the project are to establish and strengthen the national system of control of food import quality and safety. This is extremely important for Mongolia as 90% of the food consumed in Mongolia is imported. Specifically, the project will improve the institutional set up for the control of food import in Mongolia, provide training to food inspectors, strengthen laboratory facilities and train analytical staff associated with border food control. It will also raise awareness of national authorities of the work of Codex internationally, the relevance of this work nationally and the importance of full stakeholder participation in food control matters. .

41. A TCP project to develop an Export Inspection and Certification Programme in Vietnam began in May 1999 and concluded in June 2002. The main objective of the project was to assist in establishing an efficient, well-managed and reliable export inspection and certification system for food that meets WTO requirements, and to improve the capability of laboratories in Vietnam to carry out chemical and microbiological analyses of foods. Activities carried out in order to meet this objective included; training of involved parties in Vietnam on WTO requirements in the international food trade, provision of assistance to the Government of Vietnam in establishing appropriate procedures for export inspection and certification of nuts, grains, fresh and processed fruit and vegetables, training of laboratory staff in appropriate analytical techniques, laboratory management and quality assurance procedures and training of food inspectors. Additionally, study tours for 2 senior government officials were provided to facilitate insight into the establishment and day-to-day running of food export control systems, these officials will be instrumental in developing similar systems in Vietnam.

UPCOMING ACTIVITIES

42. A *Regional Meeting on Modernising Food Control Systems in SAARC Region*, will be held 10-11 December 2002 Kathmandu, Nepal. The meeting will cover aspects related to food safety (microbiology, food additives, biotechnology, nutraceuticals and micronutrient fortification of foods) food safety tools (Risk Analysis, HACCP, GMP), harmonisation of food regulations and modernising food control systems. This meeting is a direct follow-up to the Third FAO/ILSI South Asian Conference on Food Safety held in Delhi in December 2000.

Field Projects

43. The Government of Bangladesh has requested assistance in strengthening their food quality and control systems. The request was received in April 2002 and is currently in the approval process. The project objective is to strengthen the regulatory food control system in order to improve consumer protection by ensuring the safety and quality of both the domestic and imported food supplies. The project objective will be achieved through improving local food control capacity by providing on-site training in food control administration and management including review of legislation and development of food quality and food safety standards and regulations. Training will be provided to laboratory analytical staff, laboratory management, food inspectors and others involved in food quality control.

44. The Government of Thailand has requested assistance with strengthening compliance of the SPS requirements for expanded exports of fresh and processed fruits and vegetables. The project has been requested by the Government of Thailand given the great potential in Thailand for exporting fresh and processed fruits and vegetables. Thailand has experienced problems of export rejection due to microbial contamination of fruit and vegetables and safety and quality of some processed fruits. The project will address these issues through training in Good Manufacturing Practices (GMP) and Good Hygiene Practices (GHP) at the level of industry and food safety officials. Training in microbiological risk analysis will also be provided. This project is currently in the final stages of the review process.

45. The Government of Pakistan has requested assistance for building national capacity for Food Quality and Safety. Specifically, the Ministry for Food, Agriculture and Livestock (MINFAL) is seeking assistance in reviewing and revising National SPS laws, remodelling animal and plant quarantine services, enhancing the capabilities of reference laboratories, forging technical linkages and fostering cooperation with developed economies. The request is still in the initial formulation phase.