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Agenda Item 6

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CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

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DISCUSSION PAPER ON THE NEED FOR GUIDANCE FOR NATIONAL FOOD INSPECTION SYSTEMS

(Prepared by Australia with the assistance of Belize, Brazil, Canada, the European Community, France, Germany, Indonesia, Iran, Japan, Malawi, Malaysia, Mexico, Morocco, the Netherlands, New Zealand, the Philippines, Saint Vincent and the Grenadines, Thailand, the United States of America and PAHO)

BACKGROUND

1. At the 15th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) (2006), the Committee considered a Project Document¹ prepared by Australia proposing the development of guidelines for national food inspection systems.
2. Some delegations expressed the opinion that various CCFICS texts, such as the *Guidelines for Food Import Control Systems* (CAC/GL 47-2003) already include guidance on national food control systems. The Committee therefore requested that the delegation of Australia develop a discussion paper to identify areas where guidance for national food control systems is needed, and to provide the scope, justification and rationale for the new work proposal.
3. At the 16th Session of CCFICS (2007), the Committee considered the discussion paper prepared by Australia that examined whether existing Codex and/or CCFICS guidelines and standards provide sufficient direction for national food control systems and alignment with international standards. The Committee also reviewed the CCFICS Terms of Reference to examine whether its scope includes national food control systems.
4. While there was general support for new work to develop guidelines for national food control systems, the Committee agreed that the discussion paper needed to be revised to further clarify the scope of the work and identify the gaps in existing CCFICS texts, and how to link these texts together, thereby providing a framework for national food control systems. With regard to whether CCFICS is the appropriate Committee to conduct this work, several delegations considered it necessary to better clarify the scope of the work as it may include aspects which could fall under the responsibility of other Committees.
5. The Committee agreed to establish an electronic Working Group, led by Australia, to prepare a comprehensive discussion paper that would include an outline of the principles and guidelines for a national food control system, for consideration at its next session.

¹ CRD 11 Proposal for New Work by Australia – 15CCFICS (2006)

6. The purpose of the discussion paper is to examine:

- a. Whether the existing guidelines and standards produced by Codex and other international organisations provide sufficient direction for national food control programmes; and
- b. Whether CCFICS is the appropriate Committee to conduct this work.

NEED FOR DEVELOPMENT OF PRINCIPLES AND GUIDELINES IN RESPECT OF NATIONAL FOOD CONTROL SYSTEMS

7. While Codex has developed many Guidelines, Standards and Codes of Hygienic Practice that may contain components applicable to national food control systems, there are few texts that have been developed specifically to provide guidance to the competent authority on the implementation of a national food control system.

8. Four Codex documents in particular which should be considered in the context of this discussion paper include:

- a. *Principles for Food Import and Export Inspection and Certification* (CAC/GL 20-1995);
- b. *Guidelines for Food Import Control Systems* (CAC/GL 47-2003);
- c. *Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification* (CAC/GL 26-1997); and
- d. *Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1-1969, Rev. 4-2003).

9. The scope and objectives of each of these documents is import and export inspection and as a consequence there is a substantial amount of information within these documents that is not applicable to national food control systems.

10. While the existing CCFICS texts have been developed from the perspective of import and export food control systems and therefore provide most guidance to competent authorities in these areas, there are parts of CCFICS guidelines that may be applicable to national food control systems. These include sections such as the 'Clearly defined and transparent legislation and operating procedures' of *Guidelines for Food Import Control Systems* (CAC/GL 47-2003), 'Inspection and certification system infrastructure' of the *Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification* (CAC/GL 26-1997) and parts of Section 3 of the *Principles for Food Import and Export Inspection and Certification* (CAC/GL 20-1995) such as 'risk assessment' and 'control and inspection procedures'. There is however no specific reference or guidance on how these sections may be implemented in the context of a national food control system. In most cases the relevant provisions will need to be modified, albeit even slightly, to be of most benefit to competent authorities in the context of national food control system.

11. Since these existing texts were developed for reasons other than providing guidance on national food control systems, there is no cohesive presentation of what principles or provisions should apply to this subject. It is up to the individual country to determine what sections could/should apply to national food control systems and what could/should not apply, based on the context of the particular text. Furthermore, the provisions that are applicable to national food control systems are dispersed amongst a number of different texts which decreases their usefulness.

12. Codex commodity standards such as the *Code of Hygienic Practice for Meat* (CAC/RCP 58-2005) do provide governments with some guidance on national food control systems from a regulatory context, such as Section 9.2.4 Regulatory Systems. The relevant provisions are interspersed however amongst sections which for the most part are directed at the food production industry, and which provide minimal guidance from the perspective of implementation of a regulatory system.

13. The Food and Agricultural Organisation and World Health Organisation document *Assuring Food Safety and Quality: Guidelines for Strengthening National Food Control Systems* (FAO Food and Nutrition Paper 76) and its value to countries in establishing a national food control system is noted. Of particular relevance to this discussion paper is chapter four ‘Elements of a national food control system’ and chapter five ‘Strengthening national food control systems’ and Annexes Six, Ten and Eleven; ‘Guidelines for developing a national food law’, ‘Selected organisational components of a national food control agency’ and ‘Possible activities to be undertaken during the establishment of a national food control agency’ respectively.

14. While this document describes the general procedures involved in establishing a national food control system, there are components which are not described in as much detail as that provided by existing CCFICS documents for import and export food control systems. This includes areas such as the development of legislation, the specific details of a food control system, guidance on sampling and other enforcement activities. These elements could be addressed further in the proposed principles and guidelines to provide additional assistance to competent authorities in the context of a national food control system. Furthermore, the World Trade Organisation (WTO) Sanitary and Phytosanitary (SPS) Agreement identifies Codex as the reference point for international standards².

15. Given the perceived shortcomings in existing documents, it is proposed to develop new principles and guidelines by :

- a. Collating the provisions within existing guidelines and standards produced by Codex and other international organisations that are applicable to national food control system;
- b. Modifying existing provisions, where required, to ensure their effective application to national food control systems; and
- c. Developing new provisions where existing guidance is insufficient;

to create a single overarching document that countries can readily access in the context of a national food control system.

16. These proposed principles and guidelines would complement existing texts produced by Codex and other international organisations and may provide countries with a framework for a national food control system that is based on recognised principles and consistent with international obligations, to the benefit of both exporting and importing countries and international trade.

SCOPE OF THE PROPOSED PRINCIPLES AND GUIDELINES IN RESPECT OF NATIONAL FOOD CONTROL SYSTEMS

17. The proposed principles and guidelines are intended to provide a framework for the development and operation of a national food control system to ensure that foods, and their production systems, meet requirements in order to protect the health of consumers and facilitate fair practices in the food trade, consistent with existing Codex documents.

18. National food control systems in the context of this paper are those systems that regulate food destined for the domestic market. National food control systems may be focused on the food or on the procedures and facilities employed in its production.

19. Areas that may be covered include principles for the development of a national food control system and general features such as legislation, role of the competent authority in a national food control system, enforcement activities and infrastructure requirements.

20. These are outlined further in the appendix ‘Proposed outline for development of principles and guidelines for national food control systems’. The appendix has been developed to facilitate the progress of this discussion paper and new work proposal and is not intended to be interpreted or read as the final version of the “Principles and Guidelines for National Food Control Systems”.

² International standards, guidelines and recommendations: For food safety, the standards, guidelines and recommendations established by the Codex Alimentarius Commission relating to food additives, veterinary drug and pesticide residues, contaminants, methods of analysis and sampling, and codes and guidelines of hygienic practice.

CONCLUSION

21. As the CCFICS Terms of Reference include ‘to develop principles and guidelines for the application of measures by the competent authorities of exporting and importing countries to provide assurance where necessary that foods comply with requirements, especially statutory health requirements’, and with the proposed principles and guidelines directed at the general principles of national food control systems rather than specific subject and/or commodity measures, CCFICS would appear to be the most appropriate Committee to develop principles and guidelines for national food control systems.

22. Furthermore, the terms of reference of CCFICS include ‘other matters assigned to it by the Commission in relation to food inspection and certification systems’. If CCFICS determines that principles and guidelines for national food control systems should be developed, it could seek endorsement from CAC and in doing so meet its Terms of Reference.

23. The development of principles and guidelines for national food control systems, which adds to the information provided in existing guidelines produced by Codex and other international organisations, will benefit countries by providing them with the necessary tools to ensure their national systems are consistent with international standards, provide consumers with an adequate level of protection and may also encourage the application of other Codex standards.

24. The infrastructure and procedures applicable to national food control systems may also offer a framework that may be applied to ensure the compliance of exports. This may prevent a situation whereby countries have to apply different systems for domestic and exported products. The harmonisation and/or integration between national and export control systems should therefore lead to an overall strengthening of national food control systems.

25. The Committee is invited to consider:

- a. Whether there is a need to develop a document outlining the principles and guidelines for national food control systems; and
- b. Whether CCFICS is the appropriate Committee to conduct this work.

RECOMMENDATION

26. That the Committee consider the project document provided at Attachment 1 and forward this proposal for new work to the 32nd Session of the Codex Alimentarius Commission in 2009 for approval.

ATTACHMENT 1**Project Document****Proposal for New Work to Develop Principles and Guidelines for National Food Control Systems****Prepared by: CCFICS****Purpose and scope of the proposed standard**

The purpose and scope of the work is to develop principles and guidelines which provide a framework that may assist governments in the development and operation of a national food control system to ensure that foods, and their production systems, meet requirements for achieving the appropriate level of protection in order to protect the health of consumers and facilitate fair practices in the food trade, consistent with existing Codex documents.

Relevance and timeliness

While Codex (including CCFICS) has produced several guidelines, standards and related texts for import and export control and certification systems and food production and hygiene, there is limited guidance which has been developed specifically for the competent authority on the development and implementation of a national food control system that protects the health of consumers and facilitates fair practices in the food trade.

The existing Codex guidelines are narrowly focused on import and export control and certification systems, and:

- Food is primarily prepared for the purposes of domestic consumption;
- Many countries directly adopt Codex documents into their national food control systems;
- There is a substantial amount of information within existing Codex guidelines that is not applicable to national food control systems;
- There is no cohesive presentation of what principles or provisions of these documents could/should apply to national food control; and
- There is little reference or guidance on how sections of existing guidelines that may be applicable to national food control systems could be implemented.

The main aspects to be covered

The development of principles and guidelines for national food control systems would complement existing texts produced by Codex and other international organisations and may provide countries with a framework to establish a national food control system that is based on recognised principles and be consistent with international obligations, to the benefit of both exporting and importing countries and international trade.

Areas that may be covered by the proposed principles and guidelines for national food control systems include objectivity, harmonization, consistency, and transparency. General features such as legislation, food safety control programs, enforcement activities and infrastructure requirements would also be included.

An assessment against the *Criteria for the Establishment of Work Priorities*

The proposal is consistent with the criteria as follows:

Diversification of national legislations and apparent resultant or potential impediments to international trade:

While Codex has produced several guidelines, standards and related texts for import and export control and certification systems and food production and hygiene, there are limited publications providing competent authorities with guidance on the implementation of national food control systems. The proposed principles and guidelines may assist competent authorities in implementing a national food control system that is based on recognised principles and consistent with international obligations, to the benefit of both exporting and importing countries and international trade.

Scope of work and establishment of priorities between the various sections of work:

The scope of the work is to develop principles and guidelines which provide a framework that may assist governments in the development and operation of a national food control system to ensure that foods, and their production systems, deliver the appropriate level of protection in order to protect the health of consumers and facilitate fair practices in the food trade, consistent with existing Codex documents.

Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body (ISO):

The Food and Agricultural Organisation and World Health Organisation have developed documents such as *Assuring Food Safety and Quality: Guidelines for Strengthening National Food Control Systems* (FAO Food and Nutrition Paper 76) and *Food Safety Risk Analysis: A Guide for National Food Safety Authorities* (FAO Food and Nutrition Paper 87). The World Organisation for Animal Health (OIE) and International Plant Protection Convention (IPPC) are also engaged in activities to strengthen national systems through programs such as *Performance of Veterinary Services* (PVS) and *Phytosanitary Capacity Evaluation* (PCE).

These standards and programs will be taken into consideration when developing the proposed principles and guidelines to prevent any duplication.

Relevance to Codex Strategic Objectives

The proposal is consistent with Goal 1 Promoting Sound Regulatory Frameworks (Codex Strategic Plan 2008-2013):

- International harmonization based on Codex standards, guidelines and recommendations is essential to promoting a global approach to consumer health protection, including systems for the reduction of food-borne risks, and minimizing the negative effects of technical regulations on international trade.
- In strengthening the strategic focus of Codex in the development of standards and related texts based on risk and performance for broad application across a range of commodities, the CAC must give priority to establishing a coherent and integrated set of food standards covering the entire food chain. Such an approach can serve as a model for the members of the CAC to pursue food regulatory systems that provide consumers with safe food and ensure fair practices in the food trade.
- The Codex Strategic Plan also recognises that in many countries, effective food control is undermined by the existence of fragmented legislation, multiple jurisdictions and weaknesses in surveillance, monitoring and enforcements. The development of these principles and guidelines will benefit developing countries by providing them with the necessary tools to ensure their national systems are robust and consistent with international standards.

Information on the relation between the proposal and other existing Codex documents

While Codex has developed many guidelines, standards and codes of hygienic practice that may contain components applicable to national food control systems, there are few texts that have been developed specifically to provide guidance to the competent authority on the implementation of a national food control system.

The scope and objectives of CCFICS texts such as *Guidelines for Food Import Control Systems* (CAC/GL 47-2003) and *Principles for Food Import and Export Inspection and Certification* (CAC/GL 20-1995) which operate in conjunction with *Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems* (CAC/GL 26-1997) is import and export inspection and as a consequence there is a substantial amount of information within these documents that is not applicable to national food control systems.

The proposed principles and guidelines will complement the existing texts and specifically address the implementation of national food control systems.

Identification of any requirement for and availability of expert scientific advice

None required

Identification of any need for technical input to the standard from external bodies so that this can be planned for

None required

The proposed timeline for completion of the new work, including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years

Subject to Commission approval at its 32nd session in 2009, it is expected that the work can be completed in two to three years with:

- consideration at Step 3 by CCFICS 18 in 2009;
- consideration at Step 5 by CCFICS 19 in 2010;
- adoption of the proposed Principles and Guidelines by the Commission in 2011.

PROPOSED OUTLINE FOR DEVELOPMENT OF PRINCIPLES AND GUIDELINES FOR NATIONAL FOOD CONTROL SYSTEMS

SCOPE

1. The preparation of a documented framework for guidance on the development and operation of a national food control system to ensure that foods, and their production systems, meet requirements for achieving the appropriate level of protection in order to protect the health of consumers and facilitate fair practices in the food trade, consistent with existing Codex documents.
2. This document describes an approach to the formulation of principles and guidelines for national food control systems. Competent authorities may adapt these principles and guidelines, where appropriate, according to their situations.

DEFINITIONS³

Appropriate level of protection is the level of protection deemed appropriate to establish a sanitary or phytosanitary measure to protect human, animal or plant life or health.

Legislation includes acts, regulations, requirements or procedures, issued by public authorities, related to foods and covering the protection of public health, the protection of consumers and conditions of fair trading.

Official food control systems includes measures administered by the competent authority which ensure that foods, and their production systems, meet requirements for achieving the appropriate level of protection in order to protect the health of consumers.

Requirements are the criteria set down by the competent authorities relating to food production covering the protection of public health and the protection of consumers.

Verification includes activities performed by the competent authority and/or competent body to determine compliance with regulatory requirements.

PRINCIPLES OF NATIONAL FOOD CONTROL SYSTEMS⁴

This section should provide a concise set of principles relating to national food control systems and some suggestions are included below:

3. National food control systems should be governed by principles which should be used wherever appropriate to ensure that foods, and their production systems, meet requirements in order to protect the health of consumers, protect against deceptive marketing practices and facilitate fair practices in the food trade.
4. Responsibility for food safety should be shared by all involved from production to consumption, including growers, processors, regulators, distributors, retailers and consumers.
5. The food industry should have primary responsibility for delivering safe food to consumers. This includes responsibility for developing and managing systems that ensure that the food supplied complies with the official food control system.
6. The principles of Hazard Analysis Critical Control Point (HACCP) developed by the Codex Committee on Food Hygiene⁵ should be encouraged to be utilized by food businesses and recognized by competent authority(ies) as a fundamental tool for improving the safety of food.

³ Consistent with the Codex Principles for Food Import and Export Inspection and Certification (CAC/GL 20-1995), Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification (CAC/GL 26-1997) and Guidelines for Food Import Control Systems (CAC/GL 47-2003).

⁴ Developed by drawing upon existing documents, developed by Codex and other international organisations, including the Codex Principles for Food Import and Export Inspection and Certification (CAC/GL 20-1995), Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification (CAC/GL 26-1997), Guidelines for Food Import Control Systems (CAC/GL 47-2003) and the Food and Agricultural Organisation/World Health Organisation ‘Assuring Food Safety and Quality: Guidelines for Strengthening National Food Control Systems’ (FAO Food and Nutrition Paper 76)

7. The competent authority(ies) involved in national food control should have clearly defined responsibilities and authority.

8. The competent authority (ies) should be responsible for developing the regulations, standards, policies and procedures which are the guidelines for industry compliance and for verifying that industry operates acceptable systems, and when required, taking appropriate enforcement action.

- As appropriate, clearly defined and transparent legislation and operating procedures should be developed which allows for the establishment of the competent authority(ies) and the processes and procedures required to verify the conformity of products against requirements.

9. Member countries should use Codex standards and related texts (or those of other international organizations whose membership is open to all countries) whenever appropriate.

10. National food control systems should be designed and operated on the basis of objective food safety risk analysis appropriate to the circumstances. Risk analysis methodology should be consistent with internationally accepted approaches and include comprehensive scientific evaluation, wide stakeholder participation, transparency of process, consistent treatment of different hazards and systematic decision-making.

11. Food control systems should be no more restrictive than is necessary in order to achieve the required level of protection.

12. National food control systems may involve verification by the competent authority at any stage in the production and distribution process. Verification may be focused on the foods themselves, or on the procedures and facilities employed in the production and distribution chain.

13. In the choice of food control systems, consideration should be given to the costs and benefits of various interventions with respect to consumers, industry and governments.

14. Food control systems should be developed and implemented to ensure uniform application by the competent authority.

15. The principles and operations of food control systems should be open to scrutiny by consumers and their representative organizations, and other interested parties.

16. Governments should provide information on existing requirements and proposed changes to requirements should be published and, except in the case of serious and immediate danger, an adequate time period permitted for comment.

FEATURES OF NATIONAL FOOD CONTROL SYSTEMS⁵

This section should outline the components of a national food control systems and may include the following:

Role of the Competent Authority

17. The competent authority(ies) involved in any of the national food control functions should have clearly defined responsibilities and authority, regardless of whether the national food control system is comprised of multiple agencies or a single unified agency responsible for food control.

- Where the competent authorities use third party providers as officially recognised bodies to implement controls, to be officially accredited, the body should be assessed against objective criteria and should comply with the standards set out in these guidelines.

⁵ Hazard Analysis and Critical Control Point (HACCP) System and *Guidelines for its Application, Annex to the Recommended International Code of Practice - General Principles of Food Hygiene* (CAC/RCP 1 -1969)

⁶ Developed by drawing upon existing documents developed by Codex and other international organisations, including the Codex Principles for Food Import and Export Inspection and Certification (CAC/GL 20-1995), Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification (CAC/GL 26-1997), Guidelines for Food Import Control Systems (CAC/GL 47-2003) and the Food and Agricultural Organisation/World Health Organisation ‘Assuring Food safety and Quality: Guidelines for Strengthening National Food Control Systems’ (FAO Food and Nutrition Paper 76)

- The performance of officially accredited bodies should be regularly assessed by the competent authority. Procedures should be initiated to correct deficiencies and, as appropriate, enable withdrawal of official accreditation.

18. The role of the competent authority may include, but not be restricted, to:

- develop food safety control policies which address the central issues of protecting consumers' health and facilitating trade;
- ensure food regulations, standards and codes of practice are risk based and are harmonized with international requirements;
- ensure adequate resources and structures are available for the operation of an effective and efficient food control system;
- license or register processors;
- appoint authorized officers;
- apply risk-based verification, of food and food production methods;
- recognise accredited or credit laboratories in conformity with internationally recognized standards;
- accept; destroy; order reconditioning, processing, or designate as non-food use;
- retain control over consignments in transit during intra-national transport or during storage;
- provide for tracing of food products and for the recall of unsafe products;
- implement administrative and/or judicial measures when specific requirements are not satisfied; and
- forbid the export of food products which do not comply with national food safety requirements to other countries (unless specifically authorized by the importing country).

Performance

19. The national food control systems should be targeted at the most appropriate stages and operations of production, based on risk analysis conducted in accordance with internationally-accepted methodology. The frequency and intensity of controls should be designed so as to take account of risk and the effectiveness of controls already carried out by those handling the products including producers, manufacturers and distributors.

20. The nature and frequency of the verification of food production systems should also be based on the risk to human health and safety presented by the product, its origin and the history of conformance to requirements and other relevant information. Control should be designed to account for factors such as:

- the risk to human health posed by the product or its packaging;
- the likelihood of non-compliance with requirements;
- the target consumer group;
- the extent and nature of any further processing of the product;
- history of conformity of producers, processors, manufacturers and distributors; and
- potential fraud or deception of consumers.

21. The voluntary utilization of quality assurance systems by food businesses should be encouraged in order to achieve greater confidence in the quality of products. The principles of Hazard Analysis Critical Control Point (HACCP) developed by the Codex Committee on Food Hygiene³ should be utilized by food businesses and recognized by competent authority(ies) as a fundamental tool for improving the safety of food.

22. Where quality assurance systems such as HACCP are used by food businesses, the national food control system should take them into account.

23. The national food control system may include but be not restricted to, as appropriate:

- direct monitoring of premises and processes for compliance with hygienic and other requirements of standards and regulations. This may include sampling during processing, storage, transport, or sale;
- verification of the food industry's quality assurance systems via risk based audits to determine compliance with prescribed requirements, standards and regulations;
 - verification may be used to ensure that programs and HACCP plans are being implemented as documented and are effective on a continuous basis.
- identifying food which is unfit for human consumption; or food which is otherwise deceptively sold to the consumer; and taking the necessary remedial action;
- powers to recall unsafe food from sale.

Enforcement

24. The competent authority retains the fundamental responsibility to ensure the conformity of food and processes to requirements.

25. Where a product or process is found not to be in conformity, the resulting measures should take into account any repeated non-conformity of the same product or process to ensure that any action is proportionate to the degree of public health risk, potential fraud or deception of consumers.

26. The specific measures applied with regard to future production may include:

- increased intensity of monitoring of products and/or processes identified as being not in conformity and/or the undertakings concerned; and
- in the most serious or persistent cases, de-registration of the producer.⁴

Infrastructure

27. The national food control system should be fully documented, including a description of its scope and operation, responsibilities and actions for staff, in order that all parties involved know precisely what is expected of them. Documented procedures aim at ensuring that the controls are carried out uniformly and are of a consistently high quality. Documentation of a national food control system should include:

- an organizational chart of the official control system;
- roles of each level in the hierarchy (including other relevant jurisdictions i.e., State, Provincial);
- job functions as appropriate;
- operating procedures including methods of sampling, control and testing;
- relevant legislation and requirements;
- important contacts;
- relevant information about food contamination and food control;
- procedures for conducting food recalls and investigations; and
- relevant information on staff training.

28. Official control systems should meet a number of operational criteria so as to ensure their impartiality and effectiveness and in particular have, or have access to, a sufficient number of qualified and experienced personnel as appropriate in areas such as: food science and technology, chemistry, biochemistry, microbiology, toxicology, veterinary science, human medicine, epidemiology, agronomic engineering, quality assurance, audit and law. Personnel should be capable and appropriately trained in the operation of food control and control systems. Staff should have access to adequate facilities and equipment to undertake necessary procedures and methodologies. Official control systems should also possess adequate facilities and equipment to carry out their duties properly.

29. Reliable transportation and communication systems are essential to ensure delivery of services when and where they are needed and for the transmission of samples to laboratories.

30. Food control systems should utilize laboratories that are evaluated and/or accredited under officially recognized programmes to ensure that adequate quality controls are in place to provide for the reliability of test results. Validated analytical methods should be used wherever available. Laboratories should apply the principles of internationally accepted quality assurance techniques to ensure the reliability of analytical results.

31. The competent authority(ies) implementing the national food control system should be encouraged to carry out self-evaluation or have their effectiveness evaluated by third parties.

32. Self-assessment or third-party audits should be carried out periodically at various levels of the control system, using internationally-recognized procedures. The food control services of a country may undertake self-assessment for such purposes as assuring the adequacy of consumer protection and other matters of national interest or improving internal efficiency.

33. The requirements for imported and exported food should be consistent with the requirements for domestic food. These requirements may consist of standards, provisions for sampling, process controls, conditions of production, transport, storage, or a combination of these.