



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE FOR AFRICA
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USE OF CODEX STANDARDS IN THE REGION

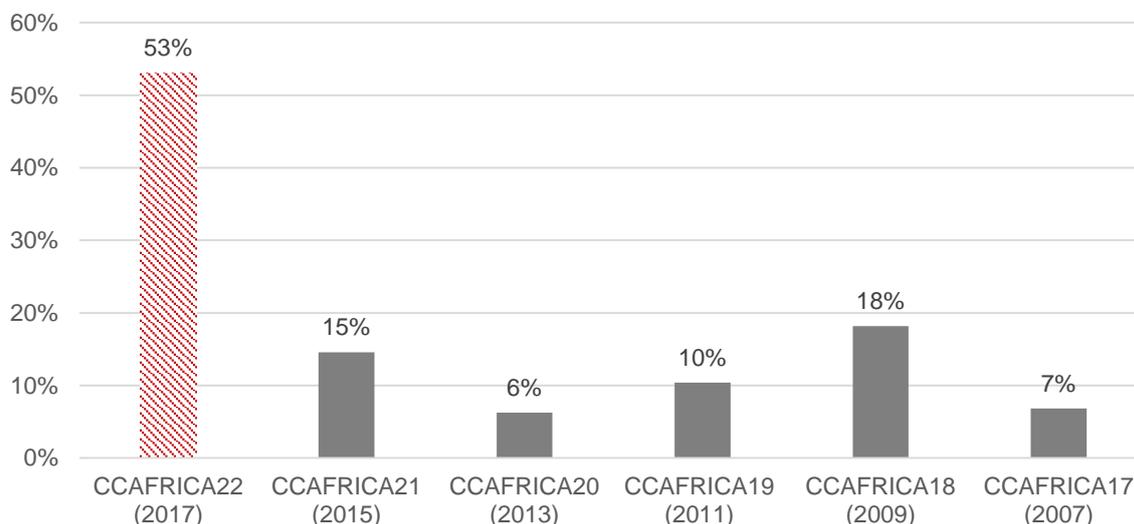
(Prepared by the Codex Secretariat)

BACKGROUND

1. Information on the national use of Codex standards and related texts was collected in the past via a circular letter and the information was utilised as the basis for discussion in all Regional Coordinating Committee (RCC) meetings.

2. In FAO/WHO Coordinating Committee for Africa (CCAFRICA) and other RCCs the reply rates to the circular letter were generally low. In addition, members often made oral reports during sessions, which further complicated the analysis and the preparation of meaningful conclusions on the overall picture. As shown in **Figure 1**, replies to the question on the use and relevance of Codex standards and related texts (hereafter “Codex standards”) in the past decade have never exceeded a level of 20 percent of the CCAFRICA membership. At CCAFRICA21 for example, only two out of a possible 48 members replied to the circular letter while five more submitted relevant information as conference room documents, constituting an overall response rate of 15 percent.

Figure 1: Percentage of CCAFRICA members that informed about the national use and relevance of Codex standards in writing



3. After the discussion on the revitalization of the RCCs it was decided to terminate the use of the circular letter and to replace it with a system to continuously collect data online for all six Coordinating Committees. As an initial step towards a more systematic approach to the questions on the use of Codex standards, and in an attempt to enhance the related data collection system, the Codex Secretariat developed a survey in cooperation with FAO and WHO for distribution to all RCCs. In the case of CCAFRICA, the survey was sent out on 5 July 2016.

4. The survey was conducted online using the software SurveyMonkey which allows for easier data analysis and representation. Separate translations into French and Spanish were also made available and members were given a period of four months to provide answers.

5. Given that questions on the general use of Codex standards had in the past not led to comparable or representative data it was decided to focus on specific standards that would be widely known and representative for their respective categories (i.e. numerical standards, general subject standards and general principles). Based on this assumption the survey covered:

- The use of Maximum Residue Levels (MRLs) for pesticides in food and feed;
- The use of three general subject standards *General Standard on Food Additives* (CODEX STAN 192-1995), *Contaminants and Toxins in Food and Feed* (CODEX STAN193-1995), *Labelling of Prepackaged Foods* (CODEX STAN 1-1985); and
- The use of *General Principles of Food Hygiene* (CAC/RCP 1-1969).

6. In addition, members were asked about difficulties related to the general use of Codex standards and were informed that other specific standards could be covered in future rounds to build up, over time, a representative data set on the use of Codex texts worldwide.

ANALYSIS AND DISCUSSION SURVEY RESULTS

7. The survey on the use of Codex standards obtained a response rate of 53 percent (23 out of a possible 49 member countries) in the AFRICA region (as of October 2016), which is the highest level achieved up to now. **Table 1** below marks all respondents in the region in bold.

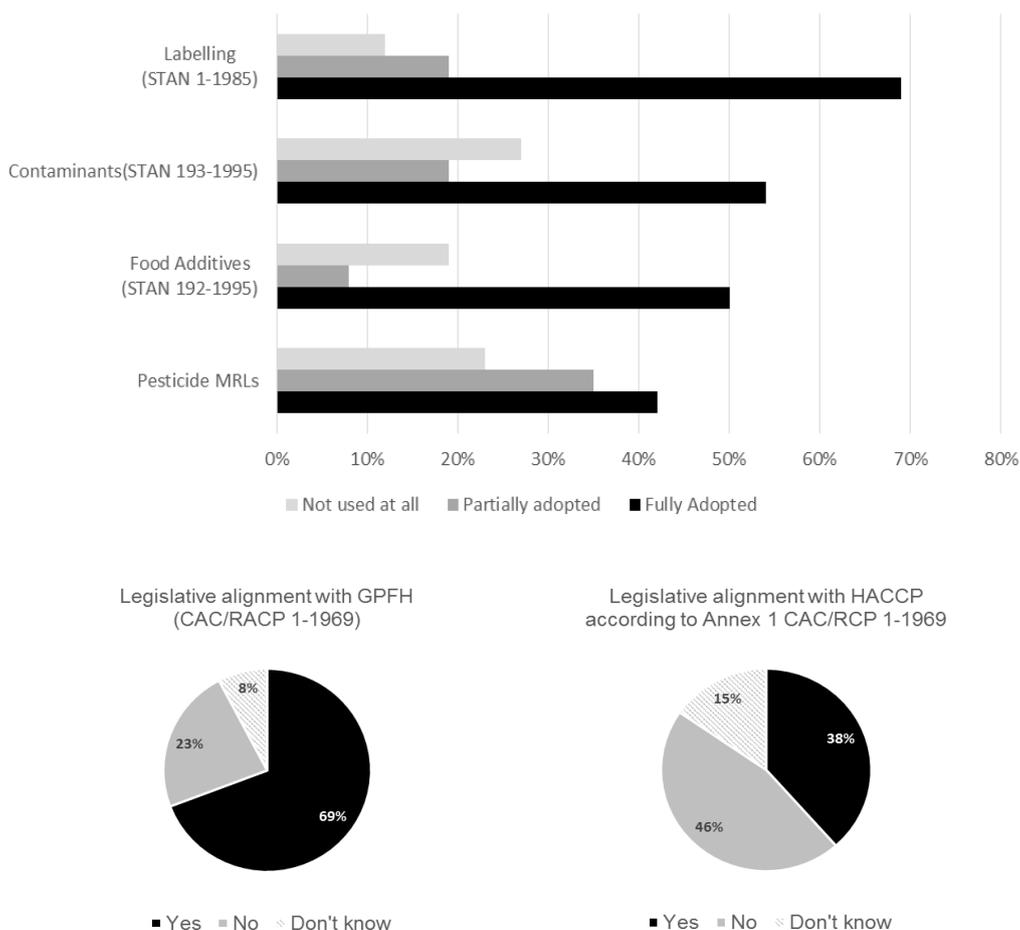
Table 1: Overview of respondents in AFRICA to the 2016 survey on use of Codex standards (respondents are in bold)

Angola	Gabon	Nigeria
Benin	Gambia	Rwanda
Botswana	Ghana	Sao Tome and Principe
Burkina Faso	Guinea	Senegal
Burundi	Guinea-Bissau	Seychelles
Cape Verde	Kenya	Sierra Leone
Cameroon	Lesotho	Somalia
Central African Republic	Liberia	South Africa
Chad	Madagascar	South Sudan
Comoros	Malawi	Swaziland
Congo	Mali	Togo
Côte d'Ivoire	Mauritania	Uganda
Democratic Republic of Congo	Mauritius	United Republic of Tanzania
Djibouti	Morocco	Zambia
Equatorial Guinea	Mozambique	Zimbabwe
Eritrea	Namibia	
Ethiopia	Niger	

8. The full survey results can be found in Appendix I (in original language). The following is a summary.
- Use of Codex MRLs for pesticides in food and feed:* While 42 percent of the respondents fully adopted Codex MRLs, 35 percent partially use but clearly reference them in national legislation. Six countries stated they did not make any use of Codex MRLs. However, one country specified that it was intending to introduce MRLs with consideration of the levels set by the Codex Alimentarius Commission and another country stated to mainly use MRLs set by the European Union (EU). Several countries also stated to use other MRLs, mainly those set by the EU, whenever there are no corresponding levels set by Codex.

- ii. *Use of the General Standard for Food Additives (Codex STAN 192-1995, GSFA)*: The technical content, structure and wording of the national regulation(s) are in 50 percent of the countries comparable to the Codex standard or only contain minimal editorial changes for the regulated additives. 31 percent of respondents answered that they have partially adopted the GSFA, which means that only parts of their national standards or regulations are identical to the GSFA or that their national texts contain some technical deviations from what is stipulated in the GSFA (e.g. for some additives). Five countries stated they did not use the standard. One country specified that a key challenge is the monitoring of additives in food and feed due to a lack of testing capacity.
- iii. *Use of General Standard for Contaminants and Toxins in Food and Feed (Codex STAN 193-1995, GSCTFF)*: The standard is fully adopted by 54 percent and partially adopted by 19 percent of the respondents. The remaining countries stated not to use the GSCTFF at all.
- iv. *General Standard for the Labelling of Pre-packaged Foods (Codex STAN 1-1985)*: The standard is fully adopted by 69 percent of countries in the region, while the remaining respondents, with the exception of three countries, have a partial adoption of the standard in place.
- v. *Use of General Principles of Food Hygiene*: Over one third of the respondents have national legal requirements for Good Hygienic Practices related to food in their country and 69 percent have aligned their legislation with the *General Principles of Food Hygiene (CAC/RCP 1-1969)*. In addition, 42 percent also require the application of the Hazard Analysis and Critical Control Point (HACCP) system in their country and 38 percent of respondents align their respective legal requirements with Codex provisions (i.e. Annex 1 to CAC/RCP 1-1969) at least for some sectors (e.g. fishery).
- vi. *Difficulties with regards to the use of Codex provisions*: The most frequently stated difficulty with regards to the use of Codex standards is the lack of local implementation capacity and resources, which are needed for adequate testing, monitoring, interpretation and implementation of Codex standards. Other difficulties stated can be grouped as follows:
 - 1. Insufficient coordination between relevant authorities in the area of food safety;¹
 - 2. Insufficient resources to participate in the Codex standard setting process leading to lack of national ownership and awareness;
 - 3. Adaptation of Codex standards to the national context/incompatibility, insufficient specificity and/or coverage of Codex standards;
 - 4. Language/translation issues (e.g. editorial errors, areas of ambiguity, repetition, format of Codex texts);
 - 5. Communication and awareness raising in multiple local languages and/or in low literacy populations;
 - 6. Time needed to revise existing national provisions to align with Codex standards combined with frequent changes e.g. of Codex MLs and MRLs impacting on national resources;
 - 7. Exporting to countries that have stricter requirements than stipulated in adopted Codex standards.

¹ One country also noted that local representations of FAO and WHO do not provide support on Codex matters.

Figure 2: Use of Codex standards and related texts in the AFRICA region

CONCLUSIONS AND RECOMMENDATIONS

9. Conclusion

10. Overall, the survey on use of Codex standards obtained a relatively high completion rate of 53 percent and respondents generally judged the survey as easy to complete and well explained. The information is thus considered representative for the region.

11. As shown in **Figure 2**, the General Standard for Labelling of Pre-packaged Foods has the highest user rate in the region, followed by the standards for contaminants and toxins in food and feed, food additives and pesticide MRLs. The general principles for food hygiene (GPFH) are adopted in two third of the responding countries of which roughly half have also adopted the HACCP system in their legislation according to Codex guidance.

12. For many African countries, difficulties regarding the use of Codex standards are related to the resource investments and capacity building required in order to use Codex standards. Many countries also struggle with a lack of awareness of Codex standards and coordination of food safety matters among local authorities.

Recommendation

13. The survey provides information that could support future national assessments and actions in the region. CCAFRICA is requested to take note of the results of the survey and to provide inputs on the following questions that could guide future action by the Codex Secretariat in this area:

- Format and approach:* Are you satisfied with the design of the survey? Do you agree with the approach chosen and explained in paragraphs 5 and 6?
- Use of the results:* Do you consider the results useful? If so, would you like to have the information stored online (i.e. embedded in the Codex website) providing an opportunity to update national information and review the information of other countries?
- Scope of next survey:* Which areas of Codex work would you like to see covered in future (if any)?

APPENDIX I – SURVEY QUESTIONS AND ANSWERS

Question 1. To what extent are Codex MRLs for pesticides in food and feed adopted in your country?

Fully adopted	11	42%
Partially adopted	9	35%
Not used at all	6	23%
Don't know	0	0%
	26	100%

Question 2. Please use this field to provide any additional comments or explanations (max. 100 words).

Nous n'avons pas de réglementation spécifique sur les LMR. Les valeurs de référence utilisées sont la plupart celles de l'Union Européenne
As the list of pesticides remains dynamic, our standards make referene to Codex MRLs. The problem remains that for some pesticides and products Codex does not offer MRLs.
Notre Limites Maximales de résidus (LMR) des pesticides sont calquées sur celles du Codex Alimentarius et de l'Union Européenne (UE) dans le cadre de notre pays, on utilise 171 LMR de pesticides (référence de 2011).
Compte tenu de notre appartenance à l'espace CEDEAO, de l'harmonisation de la réglementation sur les pesticides avec celles de l'espace CILSS qui homologue ces produits pour un ensemble de pays et prône la circulation de ceux autorisés, nous avons procédé à une adoption intégrale des LMR du Codex en vue de protéger la santé humaine et animale sur son territoire.
The codex pesticides MRLs are used in my country. They are not put in the reglementation/ The Standards of Codex are essential to our country; but we need more understanding to adopt the codex MRLs.
The MRLs are adopted through reference in standards. The challenge however is that the MRLs are not being monitored in food and feed because of capacity problems.
Some MRLs are national requirements as they are in the national regulations, but not all of them.
We usually adopt pesticide residues in food to different relevant national food standards as separate clauses and we also have the pesticide residues in food as a standard on its own.
We have still not adopted the standart of residue pesticides in Food.
Limited human resources skills for adequate implementation is a likely reason why Codex MRLs for pesticides in food and feed are not fully adopted although the Codex Standards have been adopted nationally for use in national Industrial Standards.
The food regulations are currently under revision and the limits will be sourced directly from Codex. Our Food Act dates back to 1998 and regulations to 1999 and is now being updated to cover all the pesticides. Presently, in the tenth schedule of the Food regulations, maximum pesticide residues level are available for 76 pesticides as compared to the 190 mentioned above. In addition, some pesticides used by national planters (e.g fungicide Hexaconazole) do not have MRLs yet.
Codex MRLs for pesticides are used for pesticide regulation. However, when Codex MRLs do not exist, other MRLs such as EU MRLs are used.
The standards that are elaborated in our country make reference to codex with regard to pesticide residues.
Currently not testing for pesticide residues due to lack of appropriate equipment.
Il n'existe pas pour le moment de normes nationales sur LMR. Les normes codex ne sont pas encore transcrites en normes nationales. Cependant les laboratoires et les structures de contrôle en l'occurrence la Direction de la Protection de Végétaux se réfèrent aux normes codex concernant les pesticides réglementés.

A clear reference is made to Codex Alimentarius in national regulations/legislations. This is because the Clauses for Pesticides residues in the national standard do refer directly to the updated version of the relevant Codex Standard.

Question 3. To what extent is the General Standard for Food Additives (CODEX STAN 192-1995) adopted in your country?

Fully adopted	13	50%
Partially adopted	8	31%
Not used at all	5	19%
Don't know	0	0%
	26	100%

Question 4. Please use this field to provide any additional comments or explanations (max. 100 words).

Seule la norme sur l'étiquetage des produits préemballés a été adoptée en 2012.
D'équivalence nationale NC 31/2000-20: Norme générale de numérotation des additifs alimentaires, nous adoptions la reproduction identique de la norme internationale du Codex Alimentarius tout en apportant ses contributions relatives aux recommandations du JEFCA, aux résolutions et aux modifications concernant certaines normes et textes apparentés.
Adoption intégrale pour lutter contre la mauvaise qualité et la contrefaçon des produits en vue de la protection de la santé humaine et animale (pour le respect du corpus juridique et réglementaire).
We didn't adopt the GSFA, but we use GFSA as reference because WTO SPS agreement.
The general standard for food additives is fully adopted as a National standard. The challenge however is that the food additives are not being monitored in food and feed because of testing capacity problems.
The Codex Standards have been fully adopted nationally for use as the technical content and structure are being implemented.
The GSFA is referenced in all National Food Standards where applicable.
La réglementation nationale ne prend pas suffisamment en compte la question des additifs, d'où les difficultés constatées à l'application de cette norme
Clear reference is made to it in the national standards and the GSFA is adopted as national standard.

Question 5. To what extent is the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) adopted in your country?

Fully adopted	14	54%
Partially adopted	5	19%
Not used at all	7	27%
Don't know	0	0%
	26	100%

Question 6. Please use this field to provide any additional comments or explanations (max. 100 words).

The standard does not provide limits for aflatoxin on cereal and cereal products while they are susceptible.
Codex STAN 193-1995, d'équivalence nationale NC 45: 2001-20, la norme générale pour les contaminants et les toxines présents dans les produits de consommation humaine est reproduit identiquement à celle du Codex en tenant compte de certains aspects, notamment la présence du plomb dans certains aliments qui est de nature environnementale, les révocations y apparentées.

Cette mesure a été prise pour la préservation de la santé humaine et animale contre les risques engendrés par les produits chimiques et déchets dangereux en application de la réglementation et de la législation en vigueur.
We didn't adopt it, but we use it because WTO SPS agreement.
The General Standard for Food Contaminants and Toxins in Food and Feed is fully adopted as a National standard. The challenge however is that not all the contaminants are being monitored in food and feed because of testing capacity problems. The notable contaminants that are being tested are lead, copper and aflatoxins.
Members of Technical committee deliberating on our national standards organization for local produce or Adoption/Adaption of Codex Standards as national Industrial Standards, always ensures that specifications prescribed in Codex General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) were adhered to taking into cognizance the health of our populace and Trade.
Codex MLs are adopted as national standards in relevant National Food Standards. However, Codex does not have MLs for some contaminants in food in which case standards from other regional bodies e.g. EU are used.
La norme en tant que telle n'est pas adoptée Cependant les normes relatives à certains contaminants tels que les métaux lourds sont adoptées en se basant sur les normes codex.
National requirements refer to Codex Alimentarius.

Question 7. To what extent is the *General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985)* adopted in your country?

Fully adopted	18	69%
Partially adopted	5	19%
Not used at all	3	12%
Don't know	0	0%
	26	100%

Question 8. Please use this field to provide any additional comments or explanations (max. 100 words).

Cette norme a été adoptée en 2012 et traduit en règlement technique (Arrêté ministériel).
The standard was adopted with modifications such as changes in the language to make the standard enforceable. Technical provisions were not changed.
D'équivalence nationale NC 04 : 2000-20
Cette adoption intégrale est survenue pour harmoniser notre législation à celles internationales dont le codex dans le cadre de la protection des consommateurs, préservation de l'environnement et assurer la santé humaine et animale pour un développement durable.
We have our own regulation on labelling. It is in accordance with Codex standard.
The General Standard for Labelling of Pre-packaged Foods is fully adopted as a National standard, and is fully being implemented.
The Codex Standards have been fully adopted nationally for use as the technical content and structure are being implemented.
The food regulations are currently under revision, but some requirements pertaining to QUIDS rule do not appear. There are requirements that are in addition to Codex requirements.
We have fully adopted CODEX STAN 1-1985 and it is the bases for our legal instrument on labelling of food (LI 1541)
The standard is fully adopted with minor additions.
All the provisions of this standards are fully adopted.
La norme a été rendue obligatoire par décret. La difficulté principale se situe au niveau des datages.

Question 9. Do you have legal requirements for Good Hygienic Practices (GHP) related to food in your country?

Yes	20	77%
No	6	23%
Don't know	0	0%
	26	100%

Question 10. If yes, is your legislation aligned with the *General Principles of Food Hygiene (CAC/RCP 1 -1969)*?

Yes	18	69%
No	6	23%
Don't know	2	8%
	26	100%

Question 11. Do you have legal requirements for the application of the Hazard Analysis and Critical Control Point (HACCP) system in your country?

Yes	11	42%
No	15	58%
Don't know	0	0%
	26	100%

Question 12. If yes, is your legislation aligned with the HACCP system and guidelines for its application (Annex 1 to CAC/RCP 1 -1969)?

Yes	10	38%
No	12	46%
Don't know	4	15%
	26	100%

Question 13. Please use this field to provide any additional comments or explanations (max. 100 words).

Nouse sommes en train d'élaborer la loi alimentaire qui a pour objet l'instauration d'un système de sécurité sanitaire des aliments destinés à la consommation humaine qui assure la protection de la santé et des intérêts des consommateurs.
Annex A of RCP/ CAC 1 constitutes one clause for HACCP. Other clauses were added to facilitate the implementation of HACCP study requirements. These additional requirements regard management responsibilities, documentation requirements and prerequisite programmes.
Du point de vue de son application, le Système HACCP et ses directives d'application (Annexe 1 au document CAC/RCP 1 -1969) n'est pas d'obligation légale. Cependant, La norme nationale NC 30: 2001-20 qui reprend l'application du HACCP, est d'application facultative.
L'application des systèmes BPH et HACCP est soumise à une obligation à travers les textes réglementaires régissant les activités des établissements agroalimentaires pour des produits destinés à la consommation locale et à l'exportation.
The HACCP is legal requirement for the fishery sector.
Our legal requirement for Hygienic Practices related food is an adoption of CAC/RCP 1. However, it also incorporates some information from South African and Indian standards on the same.

Most of the Codex Standards have been adopted for use nationally, however the major challenge to full adoption is limited human resources skill for adequate implementation of these standards i.e translation into three major languages in our country.
The Public Health Act requires all food business organizations to implement general principles of food hygiene and is also a requirement as per the Food Safety Policy. The GPFH has also been identically adopted as a national Standard. HACCP is presently not a mandatory requirement but as part assuring food safety, food business organization are required to demonstrate how they control food safety hazards in their production processes. The National Food Safety Policy encourages the implementation of food safety systems. There is however, a gradual move to making HACCP mandatory.
General principles of food hygiene text is widely used and we developed a standard on HACCP based on the codex document.
The legal requirements partly fulfill requirements of General Principles for Food Hygiene.
Il existe une norme élaborée par l'Association nationale de Normalisation et qui porte sur les Principes généraux édictés par la CAC. Cependant elle n'est pas rendue obligatoire, de ce fait elle n'est pas intégrée dans la législation. En ce qui concerne les Bonnes pratiques, à part les produits du secteur de la pêche et des produits végétaux destinés à l'exportation, leur application n'est pas rendue obligatoire. Néanmoins on note de plus en plus des initiatives relatives à l'élaboration de guides sectoriels d'auto-contrôle afin d'accompagner les opérateurs privés à mettre en place des plans de maîtrise adaptés à leurs secteurs.

Question 14. Where do you see the biggest difficulties with regards to the use of Codex standards and related texts?

1. Faiblesse des structures nationales du Codex entraînant un manque de connaissance sur les normes et textes apparentés du Codex. 2. Manque de Coordination entre les autorités compétentes œuvrant dans le domaine de la sécurité sanitaire des aliments et de la protection des consommateurs.
1. Language and interpretation: most of the codex standards use a language that makes the enforcement difficult even when provisions need to be mandatory requirements. 2. Some standards, especially Codes of Practices, are costly to implement and require skilled persons. 3. In Codes of Practices, most of the provisions are open which leaves room to various interpretations. These provisions should be backed up with clear examples that will guide users in the implementation.
Parmi les difficultés liées à l'utilisation des normes et des textes apparentés du codex, nous pouvons citer: -La procédure d'adoption des normes n'est pas respectée; - la multitude des textes difficiles à maîtriser et les chevauchements de compétence en matière de contrôle; -l'absence d'actions coordonnées dans le secteur alimentaire; -le niveau de technologie non adapté, notamment pour la mise en application du HACCP par exemple; -l'absence d'installations et d'infrastructures, manque de personnel qualifié.
Les principales difficultés dans l'utilisation des normes codex sont liées à la faiblesse des ressources financières pour renforcer les capacités techniques et technologiques nationales. De plus, les ressources humaines sont insuffisantes et ne présentent pas toutes les compétences appropriées. A cela s'ajoute l'absence de laboratoires performants.
Our biggest difficulties are to implement our own legal requirements./ Our country doesn't participate actively in codex standard setting process. So, we need more awareness for our decision makers. We lack skillful human resource for adequate implementation of codex text.
Aucune difficulté rencontrée.
In general the Codex standards do not contain comprehensive information on microbiological limits. It therefore becomes a challenge in their implementation at national level.
Nous pensons que les appuis techniques et financiers sont nécessaires pour les pays du SUD pour participer à l'élaboration et la transposition des normes codex au niveau national. Les bureaux de la FAO et de l'OMS de mon pays n'octroie aucun appui dans le domaine de codex.
Les difficultés se trouvent au niveau des textes réglementaires à finaliser et adopter en plus des moyens pour la formation, l'assistance technique et le renforcement des capacités du comité national du codex.
The level of national expertise to apply Codex standards requires capacity enhancement.

Literacy level of our population (bad or hard understanding of Codex standards and related texts). Language/interpretation issues. Few human resource skills to adequately implement or standardize.
The difficulties are some Codex standards do not sufficiently respond to national situation so in this case we adapt these Codex standards and also use some of the BIS/EU standards to fill the gaps or do generate data within the country to fill the gaps. Some of these standards might be for the products of national interests.
We have not experienced much difficulties, however the challenge is when we use Codex text and export to countries which have stricter requirements
Our system for serving food not organized well. Our country adopted now a new legislative framework for organizing our system
The biggest difficulties with regards to the use of Codex standards and related texts remains the limited available human resource skills for adequate implementation of these standards and related texts.
Some standards have to be adapted to the local context. We are a small island state with limited capacity and food safety related data. Sometimes the standards do not cover all our requirements, our products and our context./ In addition, 1. Amending existing legislation (including regulations) to incorporate updates can be very lengthy. 2. Implementation of the updates can be costly and may not be a priority to the country 3. National Codex committees
In general implementation of Codex standards & related texts is not effective due to financial constraint on awareness creation and promoting Codex activities at national level.
Limited capacity at national level to test and implement the standards.
Too high resource investment deriving from their adoption and unavailable human resource skills for adequate implementation.
Too high resource requirements.
La principale difficulté résulte d'abord de l'appropriation de ces normes par les autorités en charge des problématiques. Certains aspects peuvent paraître aussi difficiles à mettre en œuvre du fait du contexte et de l'absence de moyens adaptés pour leur application il se pose aussi le problème de la formation du personnel relevant des structures devant veiller à l'adoption de ces normes.
The biggest difficulties with regards to the use of Codex standards and related texts is the implementation of those documents due to lack of enough know-how of the implementers combined with the lack of transportation for the technical assistance to companies by BBN officers.
No. We do not see any difficulty.

Question 15. Please use this field to provide any additional comments on the use of Codex standards and texts (max 100 words).

L'organisme de normalisation s'appuie sur les normes et textes apparentés du Codex pour la plupart des normes du secteur agro-alimentaire. De même, la plupart des textes d'application légale sont basés sur les normes et textes apparentés du Codex.
Les normes sont utilisées comme référence pour les analyses de laboratoires de santé publique au niveau du pays. Mais une assistance technique est demandée.
We think in this kind of survey you must include some parts about financial resources for implementation or use of Codex standards and texts in each country. But questions in the survey are well thought and it's necessary.
Codex should expand its scope to include some foods such as tea or infusions and alcoholic beverages/cereal based alcoholic beverages.
Our country has not a laboratory. We have not enough financial resources to organize Codex meeting committee for adopting standards.
The use of Codex standards would be enhanced when developing countries are able to submit data to contribute to setting levels in the standards. Effective participation of the developing countries will enhance their uptake and application of the standards as this fosters ownership.
The text of this survey should be simplified.

Developing countries have resource constraints and usually use CODEX standards for exports only yet these standards must also be applied to locally consumed foods.

Il faudrait un appui pour faire le gap entre les normes codex et les normes nationales en fonction des filières prioritaires identifiées et un coaching pour la transcription des normes codex.

Codex standards and related documents are adopted at national level but there use need additional institutional support.

Question 16. Were the survey explanations and choices adequate for you to answer the survey questions?

Yes	22	96%
No	1	4%
Don't know	0	0%
Total	23	100%

Question 17. On a scale of 1- 5 how difficult was it for you to answer this survey (1 being very easy, 5 very difficult)?

1	2	3	4	5	Total
11	6	6	1	0	24