

Summary of status of countries in implementing GMP/HACCP

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Why questionnaire ?

- For seeking inputs from countries on the current scenario GMP/HACCP implementation
- To know Legislative inputs
- To understand Industry sectors covered
- To examine problems faced
- To know the Capacity built and the need
- Compilation should enable countries for better harmonization with the Codex documents and other countries in the region
- Inputs should be helpful in finalizing the regional draft guidance on criteria for GMP/HACCP for Asian Countries

Questionnaire format

- Status of GMP and HACCP legislation
- GMP:
 - Is GMP part of legislation in your country? If yes, is it for export/import/domestic food
 - Is it based on Codex documents (CAC/RCP 1 rev 2003)
 - Is it mandatory or voluntary
 - Industry sectors covered e.g. fishery, livestock, processed foods, retail, etc sectors
- HACCP
 - Is HACCP part of legislation in your country?
 - If yes, it is for export, import, domestic food
 - Is it mandatory/voluntary
 - Industry sectors covered e.g. fishery, livestock, processed foods, retail, etc sectors
- Status of certification of various industries- sector wise and who certifies (govt./ private sector certification bodies)
- Problems faced by industries if any in implementing 1. GMP 2. HACCP

Countries responded

- Bangladesh
- Bhutan
- Cambodia
- PRC China
- S. Korea
- India
- Indonesia
- Japan
- Lao PDR
- Malaysia
- Republic of Maldives
- Myanmar
- Nepal
- Pakistan
- Philippines
- Srilanka
- Thailand
- Vietnam

Summary of findings : GMP

- Part of Legislation in 14 countries
- For export – 12 countries and domestic 14 countries
- Based on Codex : 12 countries
- Mandatory in 11, mandatory for some sectors in 3 countries, Voluntary in 2 countries
- Industries covered: Mostly for processed foods specially fish (7 countries), mainly meant for export, all sectors including retail in some

Summary of findings : HACCP

- Part of Legislation in 12 countries
- For export (11 countries) and also domestic (11 countries)
- Mandatory in 6 countries specially fishery meant for export, M & V in 8 countries depending on the commodity/export & Voluntary in 3 countries
- Industries covered: Fish/meat meant for export, poultry, processed foods (e.g. desiccated coconut)

Status of certification of various industries

- By Government 6, By Govt & Pvt bodies 7, Only private bodies 5
- Number of units obtained HACCP certification varies widely depending on the size of the country. E.g. 3677 domestic/ 6000 export enterprises in China , 7 enterprises in Lao PDR
- Number of Inspectors trained in HACCP varies depending on size of country

No. of Inspectors trained in HACCP

Country	Government	Private
Bangladesh	12	10
Bhutan	29	6
Cambodia	4	5
China PRO	1000	800-900
India by EIC only	200	700
Indonesia	3100	NA
Japan	100 every year	NA
Lao PDR	45	25
Malaysia	312	NA
Maldives	20	40
Myanmar	28	None
Nepal	NA	NA
Pakistan	NA	NA
Philippines	60	NA
S Korea	423	2000?
Thailand	Hundreds	Hundreds
Srilanka	30	40
Vietnam	148	2500

Problems faced by Countries - 1

- Bangladesh: Industries not aware about GMP & no competent staff
- Bhutan: No training in HACCP requirements and capacity of officials to audit is limited
- Cambodia: Non cooperation from industries
- PR China: Lack of funds/qualified tech staff, weakness of infrastructure plans-sanitation SOPs
- India: Lack of awareness, tech and financial constraints, weakness of prerequisite programs.
- Indonesia: Inadequate knowledge and skill, lack of top management commitment, Limited human resources, Understanding of the technical concepts of food safety , High public expectation from government , Limited authority and resources of government, Mild criminal sanction,
- Japan:
 - GMP-Older facilities need more effort, including documentation .Before introduction of HACCP, improvement on GMP needed.
 - HACCP-Financial issues, especially fixing and maintenance for facilities, manufactures do'nt have realization of advantages of HACCP, correspond to its cost

Problems faced by Countries - 2

- Lao PDR: lack of awareness and the capacity to implement limited. Infrastructures inadequate, financial constraints, technical skills, use of hazardous material. Inappropriate processing of Fermented fish or meat . Generally perceived as costly
- Malaysia:
 - GMP - Inadequate infrastructure & facilities, fund. Lack of understanding in preparation documentation/ record keeping
 - HACCP Lack local market for food product with Certification. Lack of management commitment for implementation. Some industries prefer to select 'friendly' certification bodies
- Maldives: Major industries exporting fishery products to EU and US have no problem in implementing GPM and HACCP. Need to implement in all sectors

Problems faced by Countries – 3

- Myanmar: Inadequate knowledge in GMP/HACCP, Inadequate human resource
- Nepal: Lack of certifying agency in the country
- Pakistan: Lack of trained inspector and orientation to GMP and HACCP
- Philippines: Limited funding to improve the facilities/infrastructures procuring equipments (e.g. metal detectors and other similar equipment necessary for monitoring CCPs); , Lack of management support/commitment; Lack of understanding HACCP/technical expertise

Problems faced by Countries –4

- South Korea: High Cost , Most of the factories are small-scale
- Thailand: Various levels of implementation among ASEAN countries, Have problems in export due to lack of recognition of HACCP certificates
- Srilanka: Lack of Infrastructures , technical knowledge, financial scarcity ,
- Vietnam: Most of enterprises are small and medium-sized: limited resources (money, manpower) Lack of knowledge, training. Cost for implementing HACCP incl. testing is high but the effect can not seen immediately. Difficulties in management of raw material's origin

Capacity building needs to strengthen GMP/HACCP

- International Cooperation and exchanges
- Improvement of technical knowledge and development of infrastructure
- Training programmes at all levels including regulatory assessment/ISO regimen
- Technical methodology or guidance to conduct evaluation of the successes of HACCP implementation
- Quality testing equipment's for laboratories

Selected highlights of Specific countries – Malaysia: No. of industries with HACCP certification from Ministry of Health

Product Category	No.of food industry certified (HACCP)
Seafood and Seafood Product	85
Confection	42
Drink and Beverage	38
Edible Fats and Oils	36
Sauce, Vinegar and Preserved Food	19
Food Additives	19
Meat and Meat Products	16
Cereal and Cereal Products	16
Edible Bird Nest	16
Natural Mineral Water & Drinking Water	10
Others (spice, food services)	44
Total	341

Selected highlights of Specific countries – Philippines :

Legislations

- **1. *Republic Act 10611*** – “An Act to Strengthen the Food Safety Regulatory System in the Country to Protect Consumer Health and Facilitate Market Access of Local Foods and Food Products, and for Other Purposes”, also known as the “Food Safety Act of 2013”

Department of Health (Food and Drug Administration)

- **2. *Administrative Order No. 153. s. 2004*** - Revised Guidelines on current Good Manufacturing Practice in Manufacturing, Packing, Repacking, or Holding Food
- **3. *Republic Act 9711***- An Act Strengthening and Rationalizing the Regulatory Capacity of the Bureau of Food and Drugs (BFAD) By Establishing Adequate Testing Laboratories and Field Offices, Upgrading Its Equipment, Augmenting Its Human Resource Complement, Giving Authority to Retain Its Income, Renaming It the Food and Drug Administration (FDA), Amending Certain Sections of Republic Act No. 3720, as Amended, and Appropriating Funds Thereof” also known as “Food and Drug Administration Act of 2009”
- **4. *Republic Act 3720*** – An Act To Ensure the Safety and Purity of Foods, Drugs and Cosmetics Being Made Available to the Public By Creating the Food and Drug Administration Which Shall Administer and Enforce the Law Pertaining Thereto

Department of Agriculture (National Meat Inspection Service)

- **5. *Republic Act 10536*** – An Act Amending RA 9296, otherwise known as “ The Meat Inspection Code of the Philippines”
- **6. *Republic Act 9296*** – The Meat Inspection Code of the Philippines
- **7. *Administrative Order No. 28 s. 2005*** – Implementing Rules and Regulations Pursuant to the Republic Act No. 9296
- **8. *Administrative Order No. 9 s. 2003*** – Mandatory Application of Hazard Analysis Critical Control Point (HACCP) Program in All NMIC Accredited “AAA” Meat Establishments
- **9. *Administrative Order No. 19 s. 2010*** – Guidelines on Good Hygienic Slaughtering Practices for Locally Registered Meat Establishments
- **10. *Administrative Order No. 21 s. 2004*** – Mandatory Application of Good Manufacturing Practices (GMP) in All NMIC Accredited “AA” Meat Establishments

Selected highlights of Specific countries – Thailand legislations

- Food Act B.E. 2522 (1979)
- Slaughtering Control and Sale of Meat Act
- Animal Epidemic Act
- Code of Practice: General Principles of Food Hygiene
- Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for Its Application
- Code of Hygienic Practice for Milk and Milk Product: General Principles
- Code of Hygienic Practice for Milk and Milk Product: Guidelines for Its Primary Production
- Code of Practice for Fisheries and Fisheries Product: Manufactures of Fisheries in Sealed Container
- Code of Hygienic Practice for Meat: General Principles

Specific suggestions for implementation- 1

- Continuous training & evaluation for Govt CB and producer level
- International cooperation and exchanges to learn from advanced experience of foreign countries
- Develop tool kits for training of trainers
- Empowering medium and small scale industries by comprehensive training
- Not too much emphasis on documentation and infrastructure facilities, specially in older units
- Strengthen analysis capacity of necessary hazards by training analysts and provide laboratory equipment

Specific suggestions for better implementation- 2

- Implications of GMP/HACCP informed to top managers, operators, inspectors officials
- Strategies needed to increase consumer understanding and drive consumer demand/ recognition of HACCP as an important driving force to encourage food industries to implement GMP/HACCP
- Technical Methodology or guideline to conduct evaluation of the success of HACCP evaluation
- Develop GMP/HACCP at grass root level of SLDB's
- Capacity building of Govt. staff to strengthen GMP/HACCP implementation

Specific suggestions for better implementation- 3

- Accreditation of Laboratories needed for use by industries
- Incorporate certificates (e.g. ISO 22000, Global Gap) by Govt in legislations
- Improvement of technical knowledge and development of infrastructure
- Upgrade legislation and standards periodically to include latest concepts in GMP/HACCP
- Strengthening quality control and food safety management in primary production

Key issues

- Almost all countries need strengthening GMP/HACCP at Govt. /FBO level
- GMP/ HACCP implemented mostly in export oriented units e.g. fishery sector or larger businesses, but need to be extended to all sectors/ SLDBs
- Cost appears to be the main concern
- Documentation/record keeping is felt cumbersome even by countries regularly using HACCP
- Interpretation by auditors or Government is difficult, so needs further clarity
- Legislations gets outdated, containing elements of GHP, but not all aspects as in Codex documents
- How Codex documents can be incorporated in to legislation in enforceable form

Thank You