## **RISK-BASED FOOD INSPECTION WORKSHOP**

Pohnpei, Federated States of Micronesia,

18 - 21 October 2011



## **FINAL REPORT**

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## TABLE OF CONTENTS

1.	Background to this workshop	3
2.	Context of agriculture and food security in the Northern Pacific countries	3
3.	Preparation and developing workshop methodology	4
4.	Implementation of the <i>Risk-based food inspection workshop, PNI, FSM,</i> 18 – 21 October 2011	6
	Core technical topics and capacities strengthened:	6
5.	Main findings and outcomes of the workshop	9
6.	Conclusions and Recommendations to strengthen food import risk-based programmes in the region	9
Anı	nex 1: FAO Risk-based food inspection workshop	. 11
Anı	nex 2: List of Participants	. 16
An	nex 3: Summary of information on food safety and quality in the region, and status of food control and import food control in the region	. 18
Anı	nex 4: Initial Assessment of Current Systems For Import Food Inspection In Countries	. 25
Anı	nex 5: Identified next steps, and priority actions by each country to continually improve import food inspection	

#### 1. Background to this workshop

There is global recognition of the need to continually strengthen food control systems based on the risk analysis approach. Central to this approach is the identification and prioritisation of food safety risks to the population of a given country, and the adoption of cost effective control measures to minimise risks to consumer health, consumer welfare, food trade and market access. Adopting risk analysis approaches often requires a shift in the approach of both public and private sectors to food safety control, and has implications for infrastructure, technical know-how and training, and the use of food control resources.

The provision of practical guidance on risk analysis is a core element of FAO's programme on food safety and quality and is a cornerstone of FAO's Strategic Objective "Improved food quality and safety of food at all stages of the food chain". Many countries have requested technical assistance from the FAO to assist in transitioning from existing food control systems (usually based on end product standards) to a risk-based approach — including assistance in building scientific, organizational and policy capacity for risk-based food control. Food inspection has posed a key challenge to the countries in the Northern Pacific sub-region, particularly in view of their high food import dependency. Given the limited resources there is a need to develop their capacity with regards to risk-based food inspection. While some activities in this subject area had been conducted in the South Pacific sub-region, limited attention had to date been accorded to the countries of Northern Pacific. Following exchanges with countries, FSM offered to host the first such subregional workshop, bringing together food control professionals from the countries of the Federated States of Micronesia, Nauru, Palau, and the Marshall Islands representing quarantine offices, Ministry of Health and Ministry of Agriculture. These countries share similar resource constraints and food trading patterns and the subregional approach was aimed at encouraging exchange and networking to address common challenges.

This workshop provided an opportunity for the field testing of elements of two sets of training materials currently under development in FAO – the Risk Analysis Toolkit and the Import Food Control Manual.

## 2. Context of agriculture and food security in the Northern Pacific countries

In brief, key factors which impact on the agriculture and food supply in this region include: limited land mass, variable availability of arable fertile soils, limited or decreasing food productivity on the islands, a high reliance on imported foods, and limited food diversity due to small populations, limited markets, and changes in food consumption patterns. Geographical isolation among countries within the region, and from other key food markets, also significantly impacts on food supply and food trade patterns.

The food supply is highly import dependent estimated at approximately 90% of total food consumed; a significant proportion of which are processed food products.

*Specific challenges in assuring the safety and quality of the food supply include:* 

- limited human and financial resources to support food control activities
- immature food control systems, with often limited legislation and formal food control inspection activity
- limited technical, scientific capacities
- lack of prioritisation of food control based on agreed priority food safety hazards,
- non-compliant food importers, and high level of imports from higher risk countries

## 3. Preparation and developing workshop methodology

The preparation and implementation of the workshop involved a team of FAO food safety and quality officers (based in FAO, Rome HQ and in the FAO sub-regional office for the Pacific Islands, Samoa) and an international training team. The Department of Health and Social Affairs, Ministry of Health, FSM was the local counterpart and worked closely with FAO to prepare all local logistics for a successful workshop.

Initial discussions between FAO food safety and quality officers in FAO HQ and the subregional office for the Pacific Islands determined the specific needs of the target countries namely; to build and implement robust Import Food Control Programmes. This established the broad rationale and objectives of the workshop.

Workshop Rationale: Building and implementing a robust *Import Food Control Programme* requires the strengthening of numerous inter-related "functional elements" eg. legal/institutional base, infrastructure, human resource skills, inspection procedures and *risk-based planning*. This workshop focused particularly on developing an understanding of risk-based planning, analyzing its use in participating island countries, and considering what elements are important to transition from the traditional 100% inspection model to a risk-based approach.

It should be noted that the workshop was not planned to be a systematic analysis of all components of food control programs. Rather it should be considered as a first step in participating countries reviewing existing food control systems (particularly import control systems) and how they need to be improved in a gradual way – taking into account identified food safety/quality priorities, and available resources.

## Workshop Objectives:

The specific objectives of the workshop were to:

- 1. update knowledge and skills on modern concepts and approaches to food safety, including risk analysis framework
- 2. build capacity in risk-based planning for food inspection in an applied hands-on manner, and
- 3. develop an understanding of needs and challenges in transitioning to a risk-based food import inspection system

Selection of the training team members: Based on the planning learning outcomes, rational and objectives above, two Senior Food Safety Consultants were selected to provide the needed external expertise to the training team

Dennis Bittisnich – with experience in risk based food control systems, and working on the development of the FAO manual on imported food control.

Manfred Luetzow - with experience in risk analysis approaches with emphasis on risk assessment, and working on the FAO Risk Analysis Toolkit.

Development of the workshop programme: The training team worked through an iterative process to finalise the workshop programme and determined roles and responsibilities prior to the workshop.

Information on the current capacities, status of import food control in the region, and priority food safety hazard – commodity combinations was gathered in advance of the workshop – to guide trainers on preparation of workshop presentations and identification of topics for working groups, case studies etc.

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Selection of target audience: Senior food safety officials directly involved in food inspection from the small island developing countries (SIDS) in the North Pacific facing similar issues. Relevant experts would include health officials/food inspectors, MoH (with primary responsibility in these countries for food safety and consumer health protection); guarantine officials from MoA (often the first officials at the point of import).

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Invitation letters: Participating countries were invited to nominate two workshop participants based on selection criteria, which included that they should be directly involved in food safety planning and decision making and food inspection, preferably one at policy level and one at food inspector level. The host country, FSM, was invited to nominate two inspectors from each state.

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Finally, once participants were selected – they were briefed prior to the workshop on key issues to be discussed/analysed, and how they were expected to fully participate – in order to ensure they were prepared to contribute in a meaningful way to the workshop discussions and outcomes.

#### 4. Implementation of the Risk-based food inspection workshop, PNI, FSM, 18 – 21 October 2011

The agenda for the workshop and the list of participants are attached in Annexes 1 and 2.

The expected learning outcomes of the workshop was to expose and increase the understanding of officials from the target countries to the key concepts of risk analysis as it applies to building risk-based food inspection. The principles are relevant for inspection of foods produced either locally or imported.

The workshop included a combination of training delivery methods - presentations, facilitated plenary discussions, Q&A sessions, moderated exercises in plenary, and smaller working groups.

The workshop achieved the following:

- Facilitated information exchange and updated information on risk-based approaches for food inspection, with an emphasis on import food control
- Combined technical information on risk profiling (as a means to set priorities on foods to control) and guidance on approaches and tools available for strengthening national food import control programmes (this combination was effective)
- Gathered information on the current status of food import control operations and capacities in the participating countries
- A preliminary assessment by individual countries to identify their specific gaps and areas for improvement to strengthen import food control
- Exchange of information and enhanced networking among the participating countries which is very beneficial to the participants
- Provided useful feedback/insight to the ongoing development of key FAO training tools on risk analysis and import food inspection

#### **Core technical topics and capacities strengthened:**

This table demonstrates the main technical issues addressed, the expected learning output of each session and gives an insight into the logical flow and deepening of trainees knowledge through the 4-day workshop.

Training Session	Expected Learning Output
Session 1: Building food safety and quality programmes	Content: Presentations on principles and key elements of robust food control systems, including risk-based food inspection, followed by a discussion on current status of regulatory and institutional frameworks, and roles of public and private sectors.
	Expected output: Information shared on real issues and drivers in the sub-region which direct food safety/quality policy, and which may also impede it. Update on real weaknesses/challenges in national systems – e.g. legislation/standards base, enforcement issues etc. Information sharing between agencies. Resource availability: staffing levels, available technical resources and budgets for food control.
Session 2: Status of food patterns and food control in the region (Situation Analysis)	Content: Facilitated plenary discussion on food consumption, food movement/trading patterns and description of current food import control.
(Situation Analysis)	Expected output: Common understanding and baseline of food movement and use patterns in the countries/across the region, update on current inspection procedures with emphasis on current food import control patterns, as well as discussion on how to address concrete challenges facing control of food imports in the region. [Summary in Annex 3]
Session 3: Understanding your	Content: Overview of food safety risks, and introduction to risk profiles as a means to understand risks from specific food safety hazards
food safety risks	Expected output: Awareness of the purpose of food risk profiles and how they enable initial assessment of risk. General understanding of what kind of information should be considered when carrying out a risk profile.
Session 4: Developing Risk Profiles	Content: Guided plenary interactive session on developing a risk profile for ciguatera in fish and histamine in canned mackerel.  Expected output: Participants have a hands-on, concrete understanding of developing risk profiles
Session 5: Putting order	Content: Description of risk ranking as a means to use results of risk

on identified food	profiling and start to prioritise food safety risks
safety risks	Expected output: New skills in prioritizing risks (risk ranking)
Session 6: Applying risk based food inspection approaches in the participating countries	Content: Group discussion on continuous strengthening of existing food import controls to a risk-based system including using risk profiling.  Expected output: A stock take and reality check on how this updated information can be used in practice for risk management [see Annex 3]
Session 7: Further practical work on risk profiling	Content: Plenary group work on risk profiling: turkey tails and canned mackerel  Outcome: Enhanced skills and understanding of profiling food safety risks in a given food
Criteria for evaluating the effectiveness of food import systems	Content: Presentation on the Codex criteria (CCFICS relevant texts) upon which import food control systems should be developed  Expected Outcome: Greater understanding of Codex principles on building robust food import programmes
Session 8: Field Visit to a Port – point of food import	Content: Field visit to a warehouse at point of reception of container – point of inspection.  Expected outcome: Understanding of import procedures and practices when opening and inspecting a container, and review and consideration of issues to be addressed as part of moving towards a risk based system and enhanced food import inspection procedures
Session 9: Bringing it back to systems improvement and what it means nationally	Content: Country working groups to assess and review strengths and weaknesses in own national systems for food import inspection.  Expected output: The beginning of determining national priorities, issues, next steps etc. [see Annex 4]
Session 10: Understanding functional elements of	Content: Presentation on the main elements of an effective food import programme  Expected outcome: Understanding of elements/function of an import

a food import system	food system. Appreciation of the need for step-wise improvement to national systems and also awareness of criteria for judging the adequacy of the components of the system.
Session 11: What next?	Content: Group discussion in plenary identifying common challenges and opportunities.  Expected output: Country agreement on next steps, identification of needs for capacity development as a basis for future activities [see section 6].

## 5. Main findings and outcomes of the workshop

The key findings and outcomes of the workshop included:

- Summary information on food safety and quality, and status of food control and import food control in the region. Information is contained in Annex 3.
- Initial assessment of capacities for control and inspection of food imports -this initial assessment is included in Annex 4.
  - Through working groups, each country provided information on their system leading to an identification of specific system weaknesses. Through feedback and discussion in plenary, countries learned from each other's experiences.
- Identified next steps, and priority actions needed by each country to continually improve import food inspection based on risk assessment -the findings are attached in Annex 5.
  - Working in country groups, comparing existing capacities against the framework of Codex principles and the FAO practical guidance on functional elements (draft section from the FAO IFCP manual), each country determined key weaknesses and priority action to continue to strengthen their national systems.

# 6. Conclusions and Recommendations to strengthen food import risk-based programmes in the region

A range of common cross-cutting issues were identified by all countries as they continue to strengthen risk-based food inspection. Potential activities in the sub-region building on these common challenges are indicated:

i. **More practical guidance on food inspection SOPs** (particularly import food inspection). There was a common request for general technical guidance on food inspection processes and procedures, supplemented by specific advice on identifying and prioritising high risk

- food items. **Recommendation:** a regional technically- focused food inspection manual be developed (based on generic advice in FAO/WHO food inspection guidance and technical manuals developed in other countries in the region)
- ii. **Further assistance on risk profiling:** develop food risk profiling capacity to improve food inspection programs in a step by step way (transition) tackling priority issues such as food imports first in a logical way. **Recommendation:** determine how risk profiling capacity can be enhanced on a sub-regional basis to enable common list of risk foods to be identified (many of the countries have similar food import profile).
- iii. Possibility of a sub-regional project focused on promoting a harmonized approach towards Codex based food standards and risk-based inspection procedures.

  Recommendation: determine the feasibility and need for a sub-regional project which could address many of the cross-cutting challenges. Consider option of submitting to STDF for potential funding, and option of the Northern Environmental Health Association being a partner.
- iv. Possibility of regional support/interaction to prioritise the risk of commonly imported foods. Recommendation: check whether tools developed in some countries in the region could be used on a wider scale e.g. the WHO checklist developed for the Solomon Islands.
- v. Options for **South-South cooperation and information exchange**: **Recommendation:** build south-south cooperation into any capacity development initiative.
- vi. **Date marking continues to be a challenge for all countries in the region** (rules exist on what should be required on the label, however they are not always enforced or complied with, there is also the problem of receiving consignments of food which have reached or passed their expiry date. Inspectors are unsure what action should be taken). **Recommendation:** option of inclusion of the issues of date marking on the CCNASWP agenda should be followed up with the Codex Secretariat and the host country Secretariat.
- vii. There was general interest in receiving materials (assessment tool) which could be used at national level for assessment and gap identification of existing food import systems.

  Recommendation: provide simple situation analysis checklists of food control especially imported food control (possibility of providing checklists in the draft FAO Imported Food Manual).
- viii. Information on what type of demands countries can make to importers or exporters regarding condition/documentation for food consignments. evidence of registration of premises; certificate validity; lab reports. Recommendation: provide advice on rights of importing countries (and responsibility of exporting countries) in providing food safety/food control information/certification regarding imported food consignments.
- ix. Possibility of preparing a video on import inspection processes what procedures are applied to aid in training. *Recommendation:* could be developed at regional level and/or as part of multi-media component of general technical food inspection guidance.

## Annex 1

# **FAO Risk-based food inspection workshop**

# Pohnpei, Federated States of Micronesia, 18 - 21 October 2011

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## Day 1: 18<sup>th</sup> October 2011

08:30 - 09:30	Opening Ceremony	
	Objectives of the workshop, Introductions	Dirk Schulz
	Session 1: Building food safety and quality programmes	
09:30 – 10:00	Robust food control systems – principles and key elements  (includes introduction to risk analysis, risk, main food control components, import versus domestic controls, WTO, resource allocation, importance of prioritization, etc.)	Presentation (Mary Kenny)
10:00 – 10:30	Discussion on food safety and quality in the region     Drivers for food safety/quality     Existing regulatory system (enforcement powers) including planning and prioritization     Public and private sector roles and responsibilities (who is responsible for food control in the countries)	Facilitated discussion (Dirk/Dennis Bittisnich)
10:30 – 11:00	Coffee break	
11:00 – 11:30	Discussion on food safety and quality in the region (contd.)  - Understanding of weaknesses and challenges in national systems for food control  - Available staffing levels, resources and budgets  - Current trends of food consumption and food trade  - Characteristics of food imports and trading patterns in the region (any intra-regional trade?)  - Current challenges — specific examples of real food safety problems associated with food imports	Facilitated discussion (Dirk/Dennis)
12:30 – 14:00	LUNCH	

14:00 – 15:00	Risk-based food inspection     Short presentation on risk based inspection as a component of food control including:	Presentation, Q&A (Dennis)
	<ul> <li>Comparison of traditional vs risk based inspection</li> <li>Domestic vs imported foods</li> <li>Elements in conducting risk based inspections</li> <li>Transitioning from traditional inspection systems</li> </ul>	
	Session 2: Status of food patterns and food control in the region (situational analysis) Introduction to the discussion	Dirk/Dennis
15:00 – 15:30	<ul> <li>Current food inspection capacity and approaches, with emphasis on food import controls - strengths and weaknesses of food import systems</li> <li>Analysis of food import control situation in the Pacific islands</li> </ul>	Facilitated discussion (Dennis/Dirk)
15:30 – 15:45	Coffee	
15:45 – 16:15	Conclusion of Session 2 discussion	
	Session 3: Understanding your food safety risks	
16:15 – 17:30	<ul> <li>What is a risk profile and why is it useful?</li> <li>Introduction to Group work on risk profile development on day 2</li> </ul>	Manfred Luetzow
17:30	Sum up of Day 1	

# Day 2: 19<sup>th</sup> October 2011

	Session 4: Developing risk profiles	
09:00 – 10:15	Guided interactive example on risk profile development (on ciguatera in fish)	Manfred
10:15 – 10:30	Working groups (2):  WG 1: Hands on experience in developing a risk profile on scrombrotoxin in canned mackerel  WG 2: Group work and discussion on prioritization of imported foods	Manfred/Dennis

10:30 – 11:00	Coffee	
11: 00 – 12:30	Working groups (2) – continued	
12:30 – 13:30	LUNCH	
13:30 – 14:15	Working groups (2): discussion and feedback on risk profiling and prioritization tasks	
	Session 5: Putting order on identified food safety risks	
	What do you do with risk profiles? How to use the results?	Manfred
14:15 – 15:30	<ul> <li>Introduction to risk ranking – demonstration of approaches/tools</li> <li>How risk profiles and risk ranking in the context of supporting rational decision making to address priority food safety challenges with available resources</li> </ul>	Manfred/Dennis
15:30 – 16:00	COFFEE	
	Session 6: Applying risk based food inspection approaches in the participating countries	
16:00- 17:00	Group discussion on linking risk profiling and prioritization to inspection programmes for food imports  • ease and requirements to make the transition to risk-based inspection  • understanding country's capacity to undertake risk profiling	Dennis
	Sum up of Day 2	

# Day 3: 20<sup>th</sup> October 2011

	Session 7: Further practical work on risk profiling	
09:00 – 12:30	Risk profiling in plenary:  Turkey tails and canned mackerel	Manfred
12:30 – 14:00	LUNCH	

14:00 – 15:00	Presentation on criteria for evaluation the effectiveness of each of the "functional" elements	Dennis
	Session 8: Field Visit	
15:00 – 16:00	Group visit to a warehouse – point of unloading and inspecting a consignment	Dennis
16:00 – 16:15	COFFEE	
16:15 – 16:45	Discussion and feedback on findings from the field visit	Dennis
	Session 9: Bringing it back to systems improvement and what it means nationally	
16:45 – 17:45	Country working groups – initial assessment of import inspection systems	All
	Sum up of Day 3	

# Day 4: 21<sup>st</sup> October 2011

	Session 10: Understanding functional elements of a food import system	
09:00 – 10:30	Presentation on the "functional elements" of import food control systems	Dennis
10:30 - 10:45	COFFEE	
10:45 – 12:00	Session 9 (contd.): Bringing it back to systems improvement and what it means nationally	
10:45 – 11:45	Feedback from countries on individual country systems	Mary/Dirk
11:45 – 13:00	Working groups contd. Countries examine own systems/reality and start to identify main issues to be tackled and what next steps should be taken	All

	Session 11: What next?	
13:00 – 14:30	Plenary feedback and discussion on action required at national and regional level – capacity development needs and gaps identified	Dirk/Mary
14:30	CLOSING	

# Annex 2 List of Participants

# **Participants**

Country	Nominations	Department	Designation	email contact
FSM	Paul Machieng (Yap)	Health and Social Affairs	National Food Inspector	nfiyap@fsmhealth.fm
	Steven Chonmon Sawayog (Yap)	Health and Social Affairs	National Food Inspector	ssawayog@fsmhealth.fm
	Puruten Phillip (Chuuk)	Health and Social Affairs	National Food Inspector	nfichuuk@mail.fm
		National Food Safety		
	Rafaela Hallers (Chuuk)	Health and Social Affairs	National Food Inspector National Food Safety	nfichuuk@mail.fm
	Keison Shotaro (Chuuk)	Health and Social Affairs	National Food Inspector	nfichuuk@mail.fm
		National Food Safety		
	Wiriel S. Dewey (Pohnpei)	Health and Social Affairs	National Food Safety Inspector	wdewey@fsmhealth.fm
	Mason Timothy (Kosrae)	Health and Social Affairs	National Food Inspector	mmtimothy@fsmhealth.fm
		National Food Safety		
	Meriam Sigrah (Kosrae)	Health and Social Affairs	National Food Inspector	osigrah@fsmhealth.fm
		National Food Safety		

	Moses Pretrick (Pohnpei)	Health and Social Affairs	Environmental Health	mpretrick@fsmhealth.fm
		National Food Safety	Coordinator	
Nauru	Mr Vincent Scotty	Ministry of Health	Food Inspector	vincent.scotty@nauru.gov.nr
	Mr Paner Baguga	Justice & Border Control	Quarantine Officer	paner.baguga@aurugov.nr
Palau	Mr Fernando M. Sengebau	Bureau of Agriculture	Director	ffms@palaunet.com; boagri@palaunet.com
	Mr Jeff Tewid	Ministry Natural Resources Environment and Tourism	Quarantine Chef	ffms@palaunet.com; boagri@palaunet.com
RMI	Ronie Arelong	Waste and Pollutants /RMIEPA	Chief Officer	rarelong@ntamar.net
	Francyne Wase Jacklick	Ministry of Health Public Health	Administrator	leimattu@gmail.com

# Resource people

Country	Names	Organization	Title	email contact
Italy	Mary Kenny	FAO HQ	Food Safety & Quality Officer	Mary.Kenny@fao.org
СН	Manfred Lütow	saqual	Consultant, Director	maluetzow@saqual.com
AUS	Dennis Bittisnich	AQIS	Food Inspector	dennis.bittisnich@aqis.gov.au
Samoa	Dirk Schulz	FAO SAP	Food and Nutrition Officer	Dirk.Schulz@fao.org

Annex 3

## Summary of information on food safety and quality in the region, and status of food control and import food control in the region

## [ref. Session 1 and Session 2 of Day 1]

FOOD CONTROL ISSUES	Marshall Is	Nauru	Pohnpei, FSM	Yap FSM	Chuuk FSM	Kosrae, FSM	Palau
Locally produced foods	Breadfruits  Pandanas  Bananas  Taro  Chicken, pigs, fish, BBQ  Kebab s with turkey tails  Preserved foods — bananas, breadfruits  coconuts	Chicken, fish, birds(black terns), no local crops – poor soil, breadfruit, kitchen gardens – cabbages, tomatoes,	Breadfruit  Taro  Fish  Preserved bread  Pounded breadfruit  Island style seafood – in a bottle (clams, seafood cucumber – fermented, sashimi style, salt to preserve, pepper, vinegar and lime – latter when served )  Bananas  Coconut  Copra  Water melon		Similar to other FSM States	Similar to other states —very common — breadfruit, taro, tapioca, citrus fruits, fish in market, other seafoods also sold in markets dog for eating.	Taro tapioca, sweet potato, chicken, pork, seafood (fish, clams)

Import supply	Grains/rice Chicken, turkey Canned goods Water (50%) Sodas Processed foods Dairy products F&V Eggs Meat	Meat; chicken and beef  Grains/rice  Dairy  Eggs  Canned foods, frozen foods – frozen veg. frozen beef, chicken wings.	Rice, flour, cheese, eggs, f & v, candies, soft drinks, canned foods, pork, ducks, dairy, icecream, imported water – 50% is dependent on import water catchment is only for family use.	Grains/rice Chicken Pork Ice cream Canned goods Water (50%) Sodas Processed foods Dairy F&V Eggs	Grains/rice Chicken Pork Ice cream Canned goods Water (50%) Sodas Processed foods Dairy F&V Eggs	Grains/rice Chicken Pork Ice cream Canned goods Water (50%) Sodas Processed foods Dairy F&V Eggs	Grains/rice Chicken, ducks, goose, lamb. Pork Ice cream Canned goods Water (50%) Sodas Processed foods Dairy F&V Eggs
	75-90% food supply  Asia origin  Philippines,	75-90% food supply  Asia origin  Philippines	75-90% food supply  Rice – Oz, China, Japan, Canned goods – Japan, US, Phil	75-90% food supply  Asia origin  Philippines	75-90% food supply Asia origin Japan	75 – 90% food supply  Asia origin  Philippines	75-90% food supply US origin Asia

	China,	Australia	biscuits- Oz and Fiji	Australia	Philippines	Australia	
	Australia Fiji US	Fiji	Mackerel cans from Chile but now less so (earthquake)- 70% - US.	US	Australia Fiji US -70%	US	
	Transhiped via Guam  About 10 importers; more than 10 wholesalers	2 ships / month  Transhiped via Guam  11 importers	27 importers  3 exporters – fresh marine, frozen fish for canning – US, Vietnam, Hawaii,	2 fleets 2.5 ships / month  Transhiped via Guam  About 16 importers	3 ships / month  Transhiped via Guam 20 -23 importers	21 importers	5 ships / month ? importers licensed Also export tuna chilled to Japan
Population?	60,000	10-11,000	111, 000 (FSM in total)				20,000

Food safety concerns?  - Disease/illness - Labelling - Fraud or adulteration		Power failures – hard to maintain a cold chain. Food shops regulated to have a generator.			
Food regulations  - Domestic - Import - Export	Laws not sufficiently enforced	Laws not finalized			
Institutional structures	No procedures in place.  No communication between ministries.	No work instructions  No procedures  Charge \$50 entry or \$100 years  Q - ban on import of chickens, birds			Q and Customs are frontline

Posourcos			ESM — across the 4 states	
Resources  - Inspectors - Infrastructure - Transport - Administration - IT - labs	6 inspectors MoH/ 6 Quarantine inspectors	food inspector (MoH) for all island – food officer;	PSM – across the 4 states  2 national inspectors at each state – only at borders. But 10 in Chuuk.  2 - 4 domestic inspectors in each state  Can work post borders to investigate bill of lading and suspicious issues.  Extra attention is paid to containers with no bill of lading.	12 inspectors for quarantine cover all issues
	Inspection only on establishments	6 – Quarantine officers (DoA)	Consignments are further inspected at the final destination – premises - wait for consignee to call for off-loading.  Also have state sanitation – responsible for monitoring and following	seals placed on  – MoH can work with Q
	(point of sale) within the country.	Quarantine are front line – and if they	up on the ship.  In FSM two levels of inspection – federal level – food imports and	inspectors when there is a problem but
	believe there is a problem they alert MoH (the one inspector).  Would do something but this does not happen in practice.	exports – at state level – inspectors look after domestic preparation and domestic produced foods.	health inspectors mainly inspect	
		MoH (the one	Before ships arrive – the bill of lading is provided. Customs have their own list – some containers – customs and food inspector inspect – and for consignment that have to be inspected by both – both have to be present to sign off.	within the country not at border.
		Customs – collect taxes – they open the seal. Cigarettes and alcohol – more the matter for customs – and so if they do not have listed alcohol and cigarettes – we call customs and if they see a food safety matter –		
	No standards, just use health act. Food regs		they notify us in the health inspection office.  The documents and records in FSM are in paper form (most advanced).	
	are in draft. Legal framework		% of inspection coverage – Kosrae almost 100% as fewer containers  Chuuk – lower % as small volume – Jap – 80-90% of coverage of	

	exists but system very weak at border for food inspection.  Inspection of facilities; supermarkets or establishments	containers – inspected.  all look at the bill of lading – as a trigger to inspect – higher risk – chilled, frozen, check the temperature – to see if a problem. For dried foods – pretty much random circulation – food recalls –  Do you have written procedures? – no, not written down, training word of mouth.
Procedures/processes  - Inspection instructions - Risk assessment - Import clearance procedures - Certification issuance / review - Sampling/testing - Fees/costs - Admin - Training		FSM is the most advanced with the import food inspection system, and has strongest system of record keeping.  Bill of lading notified prior to landing  Random containers are selected for inspection  Both Q and food inspectors are present  Or Q and food safety refer to each other.  Monthly reports show variation between states  Focus on risk foods chill foods, meat etc should be looked at.  Dry foods randomly selected.  Work with Customs to select containers esp recall collaborate with Q and Customs.  No written procedures to select and inspect.

		Review temp log 1 <sup>st</sup> step				
		ID those containers where there is a problem then select containers				
		for inspection.				
		Notify importers; who need to call inspectors at discharge.				
		All have some form of charging flat fees for registration. \$200-500.				
		Some charge container inspection fee.				
		Customs and Q charge entry fees separately.				
WHAT ARE REAL	Melamine incident –					
PROBLEMS OVER PAST TWO YEARS?	INFOSAN is an import info	ormation source.				
TWO TEARS!	Peanut butter					
	cereal for baby food					
	·					
	histamine – canned mack	rerel				
	histamine in canned tuna	) <del>-</del>				
	had to dispose a whole container of frozen chicken - temperature was too low –					
	Mis declaration of ingred	ients – cereals				
	All have contact point for food imports.					

## Annex 4

## **INITIAL ASSESSMENT OF CURRENT SYSTEMS FOR IMPORT FOOD INSPECTION IN COUNTRIES**

the power in your Food Law to ensure that human consumption is not put on the market?	Yes	Food sofety act 2005
	Yes	Food safety ast 2005
		Food safety act, 2005
a requirement in your food law on date	Yes	All packaged foods must have expiry dates.  Expiry date, use by date will have the same meaning.
e explain what it is	Yes	is contained in the draft regulations
specific legal provisions for food imports?	No	Specific food import regulations are in draft form - will cover food imports with more specific requirements, powers for detaining containers, ability for over-labelling (to ensure label is in English)
TS TO FOOD IMPORTER/OR TO EXPORTER IN NG COUNTRY		
specifications?	Yes	All importers are given a copy of the Food safety act, 2005 which requires food imports to be:  a) pest free
	IG COUNTRY	IG COUNTRY

			b) ensure correct temperature(for frozen) c) labelling of food (expiry dates)
	If yes, what are they?		d) label in English as above
3.	LIST AGAIN WHAT ARE YOUR MAIN FOOD IMPORTS according to highest volume if possible		Rice, flour, noodles, canned foods, frozen foods, dairy products, fruit and vegetables, eggs, confectionary.
4.	WHO IS EFFECTIVELY CARRYING OUT INSPECTION AT THE BORDER?		Quarantine officers are active at the border, however they focus more on traditional quarantine issues, food inspectors (MoH) are not so organised. However, in the case of melamine, the Health dept were involved (INFOSAN notifications are active in the region).  Paper work should be consistent with the quarantine.
5.	DO YOU HAVE CRITERIA FOR DECIDING WHICH IMPORTED FOODS TO INSPECT?	No	It's up to the inspector (quarantine), which importer to target for inspection.  We definitely need to have a stronger role for health dept. working closely with border control.
	If yes, what are they?		
	Are criteria written down? or is it up to each inspector?	No	
6.	INSPECTION OF CONSIGNMENTS/FOODS.		
	APPROXIMATELY WHAT % OF CONSIGNMENTS DO YOU		100% of consignments are inspected by quarantine

	INSPECT?		
	HOW OFTEN DO YOU INSPECT EACH FOOD TYPE? do you give priority to some food types over others?		Every shipment is checked to the same level, no system for prioritisation.
7.	WHAT DO YOU INSPECT IN A FOOD CONSIGNMENT? (EG. PHYSICAL INSPECTION, DATE MARK, INGREDIENT LABELING, SAMPLES?)	General inspection	Condition of the continuum, browse through check the content for damages, small peculiarities (smell), pest invasion, packing material, temperature records if refrigerated/frozen foods. Don't look in detail at the foods.
8.	LABORATORY TESTING		
	If you decide to analyse a food sample – where is the testing carried out?		No mechanism (undertaken abroad)
9.	RECORDS AND DOCUMENTATION		
	What records do you keep – list the types of forms		Temperature control forms of reefers  Manifest – ships record – pre-notification.  No standard forms for rejection of consignments.
9.	COMMUNICATION WITH OTHER COUNTRIES (consider exporters, government in exporting countries, or neighbouring countries	yes,	Communication occurs within country with the importers.  With Moses Preterick? (Pohnpei, FSM). On health side there is also a network of communication through the Northern Pacific EH Association.
	Do you communicate with other countries?	No	

If yes, with whom, how and when
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	PALAU	Yes/No	Comments
1.	FOOD LAW		
	Do you have the power in your Food Law to ensure that food unfit for human consumption is not put on the market?	Yes	
	Do you have a requirement in your food law on date marking?	Yes	All food needs a label in English. Should be commercially packaged.  Also expiry date is required in Regulations.
	If, yes – please explain what it is		
	Do you have specific legal provisions for food imports?	Yes	
2.	REQUIREMENTS TO FOOD IMPORTER/OR TO EXPORTER IN THE EXPORTING COUNTRY		
	Do you have specifications?	Yes	
	If yes, what are they?		Import Permit requirements for fresh and frozen products (single entry and multiple entry for each consignment). Importers know they have to do this. (permit requires health certificate). Monitored by quarantine.

			For food safety, it says food should be fit for human – but not more specific. Quarantine requirements are more specific.
3.	LIST AGAIN WHAT ARE YOUR MAIN FOOD IMPORTS according to highest volume if possible		Frozen meat and vegetables, fruits, canned food, poultry, dairy products.
4.	WHO IS EFFECTIVELY CARRYING OUT INSPECTION AT THE BORDER?		Quarantine do all the food import inspection. Quarantine also certify food import and export.  If there is a health, food safety problem we call them if there is a problem.
5.	DO YOU AVE CRITERIA FOR DECIDING WHICH IMPORTED FOODS TO INSPECT?		
	If yes, what are they?	Yes	Frozen and perishable – we give priority.
	Are criteria written down?	No	Not written down but in practice
	or is it up to each inspector?		
6.	INSPECTION OF CONSIGNMENTS/FOODS.		
	APPROXIMATELY WHAT % OF CONSIGNMENTS DO YOU INSPECT?		100%, and random sampling for fresh ffv (visually inspect for no live pests)
			No real routine inspection by MoH – but we contact them if there is a problem. MoH is there for first clearance of ship but don't look at the consignment from a food safety perspective.

	HOW OFTEN DO YOU INSPECT EACH FOOD TYPE? do you give priority to some food types over others?		
7.	WHAT DO YOU INSPECT IN A FOOD CONSIGNMENT? (EG. PHYSICAL INSPECTION, DATE MARK, INGREDIENT LABELING, SAMPLES?)		Labelling, date, customs and quarantine do all the inspection. if from a high risk country we inspect everything
8.	LABORATORY TESTING		
	If you decide to analyse a food sample – where is the testing carried out?	No	There is a little capacity in our country testing by the EH in Palau – some micro lab facilities -
9.	RECORDS AND DOCUMENTATION		
	What records do you keep – list the types of forms		Bill of lading, permits, certificates and invoices.
10.	COMMUNICATION WITH OTHER COUNTRIES (consider exporters, government in exporting countries, or neighbouring countries		
	Do you communicate with other countries?	Yes	At regional level there is good communication between MoH with FSM, Guam, Saipan, Marshalls. Also EH inspectors communicate with the WHO and FDA. Quarantine don't but EH do.
	If yes, with whom, how and when		

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	MARSHALL ISLANDS	Yes/No	Comments
1.	FOOD LAW		
	Do you have the power in your Food Law to ensure that food unfit for human consumption is not put on the market?	Yes	The Food Safety Act, 2010 states - Display, Sale, Serving & Storage of Food: Division 1- <u>Display and sale of Food:</u> A person must not display food in such a manner as to cause the food to become contaminated; <u>Sale of Unclean</u> <u>food:</u> A person must not sell food that is not clean or food which is in a package that is not clean
	Do you have a requirement in your food law on date marking?	Yes	Date marking includes expiry date, best before, use by.
	If, yes – please explain what it is		<ul> <li>ii. The Law states: All pre-packaged food produced, processed, packed, distributed, or imported shall be labeled with the following information:</li> <li>iii. a. The name of food; b. List of ingredients; c. Net contents or drained weight; d. Name and address of the manufacturer or packer or</li> </ul>
	i.		distributor;  iv. e. Lot identification; f.Date marking and storage instruction; and g.  Instruction for use.
	Do you have specific legal provisions for food imports?	Yes	Provision is made in the Food safety act which states The purpose of these Regulations is to protect the health of the public and to protect the consumer against deception and from food of unacceptable and poor quality. These Regulations apply to food imported into, or produced and processed in the Republic of the Marshall Islands for domestic consumption

			or export/re-export.
2.	REQUIREMENTS TO FOOD IMPORTER/OR TO EXPORTER IN THE EXPORTING COUNTRY		
	Do you have specifications?	Not sure	
	If yes, what are they?		
3.	LIST AGAIN WHAT ARE YOUR MAIN FOOD IMPORTS according to highest volume if possible		Rice, canned goods, Chilled/Frozen Meat, Vegetables, dairy products, soda, beer
4.	WHO IS EFFECTIVELY CARRYING OUT INSPECTION AT THE BORDER?		No border controls – all inspection is done when the foods are on the internal market (shelves)
			Quarantine are looking at chilled and frozen but not sure how much they look at food safety issues. There is an overlap of agencies in domestic control
			Customs – do check at border (not food inspection), mostly paper work.
5.	DO YOU HAVE CRITERIA FOR DECIDING WHICH IMPORTED FOODS TO INSPECT?	NO	
	If yes, what are they?		
	Are criteria written down?		

	or is it up to each inspector?		
6.	INSPECTION OF CONSIGNMENTS/FOODS.		
	APPROXIMATELY WHAT % OF CONSIGNMENTS DO YOU INSPECT?	Zero	Only inspected when on the shelf, no border controls. As of date, inspections of consignment foods have not been done. Although, EPA, local government, Quarantine, MOH, have gone to stores to perform food inspection.  In the last two years, inspection within Marshalls was transferred from EPA to MoH, however a system for proper inspection still needs to be established.
	HOW OFTEN DO YOU INSPECT EACH FOOD TYPE? do you give priority to some food types over others?		Inspections within the country are done on a quarterly basis; but not consistent
7.	WHAT DO YOU INSPECT IN A FOOD CONSIGNMENT? (EG. PHYSICAL INSPECTION, DATE MARK, INGREDIENT LABELING, SAMPLES?)		Currently, only foods on the shelf are inspected.
8.	LABORATORY TESTING		
	If you decide to analyse a food sample – where is the testing carried out?		No laboratory testings are done; however, most lab samples are sent to US (Hawaii) for confirmation of testings.
8.	RECORDS AND DOCUMENTATION		

	What records do you keep – list the types of forms		All at the point of sales  For food handlers, MOH gives out food certificates  For expired items: EPA does inspection report on expired items  Restaurant checklist: EPA does Restaurant gradings
9.	COMMUNICATION WITH OTHER COUNTRIES (consider exporters, government in exporting countries, or neighbouring countries		There is some communication with other neighbouring countries. It is recommended that MoH become a member of the Northern Pacific EH Association.
	Do you communicate with other countries?	Yes	
	If yes, with whom, how and when	Yes	Communication is usually done between USFDA, WHO regarding international food recalled.

Federated States of Micronesia (Chuuk, Yap, Kosrae, Pohnpei)

1. FOOD LAW

Do you have the power in your Food Law to ensure that food unfit for human consumption is not put on the market?

Yes/No

Comments

Very empowering

yes

Do you have a requirement in your food law on date

marking?

		T
	If, yes – please explain what it is	14/59 public law – lot id code, exp date fresh fruits/veg not labelled.
	Do you have specific legal provisions for food imports?	in public law – covers all foods – same requirements for imported foods as domestic produced foods
2.	REQUIREMENTS TO FOOD IMPORTER/OR TO EXPORTER IN THE EXPORTING COUNTRY	Valid FSM licence for all importers. Imported foods must comply to public health law.
	Do you have specifications?	
	If yes, what are they?	
3.	LIST AGAIN WHAT ARE YOUR MAIN FOOD IMPORTS according to highest volume if possible	Frozen food, (chicken, turkey, beef, pork, shellfish, water, fish) Chilled (eggs, cheese), Dried (Canned tuna, rice, flour, seasoning, sugar, ramen/noodles, cereals)
4.	WHO IS EFFECTIVELY CARRYING OUT INSPECTION AT THE BORDER?	
5.	DO YOU HAVE CRITERIA FOR DECIDING WHICH IMPORTED FOODS TO INSPECT?	We don't have one specific foods that we look at
	If yes, what are they?	

	Are criteria written down?	
	or is it up to each inspector?	No written procedures
6.	INSPECTION OF CONSIGNMENTS/FOODS.	
	APPROXIMATELY WHAT % OF CONSIGNMENTS DO YOU INSPECT?	100% frozen  For dried goods – random approx 50% - influenced if there is a problem.
	HOW OFTEN DO YOU INSPECT EACH FOOD TYPE? do you give priority to some food types over others?	
7.	WHAT DO YOU INSPECT IN A FOOD CONSIGNMENT? (EG. PHYSICAL INSPECTION, DATE MARK, INGREDIENT LABELING, SAMPLES?)	Conditions of consignment.  Date marking (include country of origin)  Physical check, date mark, labelling.  Carry out sampling if there is a complaint from a consumer
8.	LABORATORY TESTING	
	If you decide to analyse a food sample – where is the testing carried out?	US, samples collected at each state and sent through Moses, MoH in Pohnpei. Samples taken only when there is a problem with a consignment. There is no agreement with a laboratory in foreign country – organised on an ad hoc basis when needed.

9.	RECORDS AND DOCUMENTATION	
	What records do you keep – list the types of forms	Records kept on:  - import food  - export forms  - details of inspection  - case of rejection  - facility inspection – food storage.  - temperature reading log sheet during transport  - complaint reports  - recall forms
10.	COMMUNICATION WITH OTHER COUNTRIES (consider exporters, government in exporting countries, or neighbouring countries	Communication always though importer and exporters and sometimes, with others if recall.  Every two years - training of inspectors – share issues of each state.
	Do you communicate with other countries?	
	If yes, with whom, how and when	

#### Annex 5

# Identified next steps, and priority actions by each country to continually improve import food inspection

#### Marshall Islands

- 1. Revise our act and regulations on import and export act has been adopted in March, 2011.
- specify requirements for importer/exporter
- include criteria on what to inspect in import
- include inspection of consignment food
- specify record keeping and documentation
- include communication with other countries

Want to do by end of November 2011.

Need to decide what is best mechanism – it may not be necessary to revise the law or regulations, but instead develop stronger standard working procedures to address these important issues.

- 2. Clearly identify who are the food inspectors and provide training to them tidy up issues between EPA and MoH inspectors, to ensure that there is effective food inspection at the border.
- 3. Strengthen collaboration and coordination of duties and responsibility of relevant parties MOH should be leading party to decide who does what across the following MOH,, the task force, EPA, customs, quarantine, and local gov. (based on key decisions in law/or strengthened procedures).
- 4. To conduct training and awareness raising on the requirements of the food law provisions and standard operating procedures (once updated and adopted).

What assistance available? very limited resources. Dirk has a mission to the Marshalls with WHO this year.

#### Nauru

1. Review food laws – especially labelling – date marking requirements....

Really a confusion in our laws. Clearer guidelines on what they should require is needed – draft regulations exist, but our Act specifies use by and best before, but is an interpretation.

Should the date marking requirement be in the Act or at regulation level?

1. Like to see MOH play a stronger role at border, and work in harmonised way with Quarantine officers.

Could sit down with other border control personnel and work out a mechanism for inspection and control at the border. Option of MOU setting out agreement across different inspection groups (customs, quarantine, MoH etc.).

All training is welcome - we have not had training for food inspectors. Infrastructure for procedures and processes (forms, inspection procedures) among the inspectors also needs to be built up.

- 2. Cargo integrity need rules on how foods should be packaged, shipping standards. (currently non-food items and foods are shipped together eg. food with washing machines, flour with washing powders). What information can we provide on that?
- 3. Record keeping by MOH as quarantine already has strong records, but MoH none....

Exchange programme between the countries (south-south) to learn from each other on procedures,

#### Palau

- 1. Get in touch with division of EH and see what needs to be done.
- 2. Food inspection at the border should be strengthened (rather than checking when food already in the country for sale)
- 3. Review on regs and laws (gap analysis of what is missing)
- 4. Define roles who is responsible
- 5. Operation manual for inspection and border procedures to be in place
- 6. Capacity building and funding (based on identified needs)

#### Federated States of Micronesia

- 1. Develop risk profile data looking at risk frozen foods and chilled, dried foods. Our thinking is to develop a profile of food, countries, and importers to help prioritise the foods we do inspect. To target bad importers etc. How? National forum (has started this work, each State is filling in the information to Moses to keep at central area) to document non compliance to see what is non compliance, from where which importers this is important for gathering and storing data as a basis/evidence for requirements/controls.
- 2. Records are still in paper form. Trying to work with Statistics office to come up with a statistics database for central storage of all food import records.
- 3. Strengthen laboratory testing shorten laboratory analysis time (to allow timely release of consignments) chemical, microbiological capacity. Also have better work procedures to access laboratories in other countries
- 4. Need an inspection procedural manual.
- 5. Review and update legislation.