

## **CHAPTER 2**

### **NATIONAL STRATEGY FOR ENSURING FOOD SAFETY**

Like any other country, India has its own unique environment and constitutional requirements. It is necessary that our strategies to develop and implement national food control system should be India specific. At the same time, the system needs to be in line with the present day agreed principles and international requirements, such as those of WTO and Codex Alimentarius Commission. The task of ensuring food safety and quality and responsibilities for implementing food control measures are spread over different departments and ministries at the central, state and local body levels. Even then, there are several gaps, which are not adequately covered, and other areas, which are over-regulated. Therefore, the very first task is to decide on the role and responsibilities of a modern food control system. The strategy should then aim at a cost /effective national framework for an integrated system within which each limb of the government can play its allotted role in accordance with a national policy and its direction. Since 1981 there have been several occasions on which the subject of a national strategy, need for consolidation of food laws and measures to strengthen the food control system have been discussed. But, little progress has been made to implement the recommendations from such deliberations.

#### **Why the Strategy?**

- Bring about decision-making processes on sound scientific and transparent platform;
- Eliminate or reduce duplication and adhoc decisions, and promote uniform application of protection measures throughout the country;
- Bring together and coordinate various components of the system within a nationally integrated one across the food chain;
- Setting national, regional, or local priorities based on data from food borne disease surveillance, contaminants monitoring, food intake studies, export detentions and other information.
- Monitoring to see that each component is meeting well defined objectives;
- Provide a timeframe for action and achievement of predetermined milestones;
- Enable an objective assessment of the requirements for manpower and financial resources with better prospects of meeting those needs.

#### **Objectives of Food Control System**

Food Control System covering safety and quality of food should have the following broad objectives:

- Protection of the consumer against health hazards and commercial fraud due to adulteration and misinformation – the core objective;
- Developing and protecting the system for production and distribution of safe food in the interest of national economy;
- Facilitation of domestic and export food trade.

- Communication of food risks to consumer and those engaged in post-harvest handling and distribution of food.
- Prevention of food hazards.

### **Challenges for stakeholders**

- New and emerging food borne hazards and increasing burden of food borne illness.
- Globalization of food trade and access to more diversified food imports.
- Rapid urbanization and changes in life-style, demand for increasing variety in diet, and consumer preferences.
- Growing consumer awareness of food safety and increasing demand for reliable information.
- Changing technologies in production, processing and distribution of food and need for innovations.
- Complexity of ensuring food safety in the entire food chain adopting the concept of farm –to-table food system involving small and large farmers, millions of middleman (food handlers), street food vendors, hotels and restaurants, and organized food industry.
- International trade and need for harmonization of food safety and quality standards and their application.
- Science based and transparent risk assessment and management decisions and their implementation through an integrated food control system covering the entire food chain.

### **Basic Requirements of the Strategy**

- Need to improve and reinforce the participation of the health sector in risk assessment and standard- setting activities relating to food in order to promote and protect consumer well being, health and nutrition.
- Need for clearer distinction between functions of risk assessment undertaken by experts and that of risk management undertaken by managers in inspection and related agencies, while recognizing the linkages that exist between the two.
- Better definition of the role and responsibilities of the Ministry of Health and clarifying the need, type and extent of support from and collaboration with other concerned Ministries/departments, at Central and State levels, to improve performance and promote accountability.
- Need for food safety activities and protection measures to have greater independence (autonomy) within the overall structure of the government and need for their greater visibility within the government.
- Strengthening links and developing improved interaction with international activities of FAO, WHO, CODEX, WTO, etc.
- Coordinating and strengthening the role of food inspection agencies at Central, State and Local Body levels in risk management, monitoring performance of food protection measures to ensure coherence, uniform application of better consumer protection.
- Identification and participation of national experts from different disciplines to advise and assist in risk assessment and risk management policies, and in decision making and evaluation tasks.

- Increasing application of preventive approaches like GAP, GMP, GHP and HACCP rather than mere enforcement measures, and putting in place systems for assessment and certification of such practices.
- Need to make an objective assessment of resources needed for the identified tasks. Additional funds for the government for improving food control system may be available but are not actually allotted until an emergency such as in food exports occurs. Therefore it is necessary to document the returns from an improved food control system, including savings in costs of food borne disease, to emphasize its importance in monetary terms.

## **Definition Of Major Tasks Within The Strategy**

A national strategy should include the following major tasks.

### **1.Establishment of a New Agency**

The first task of the proposed strategy is to recommend the development of a suitable organizational framework for a new competent Agency to implement an integrated food control system covering the entire food chain. This does not exist today. The new Agency should streamline the relevant standards, monitoring, inspection, certification and enforcement activities currently carried out by different Ministries and institutions, within an overall policy frame determined by a council of Ministers (Health, Agriculture, Food Processing Industries, Commerce). While clearly prescribing the role and responsibilities of the new Agency, its relationship with existing agencies should be delineated in accordance with their competence.

### **2.Co-ordination**

It is a key policy tool and should receive the most careful consideration during the process of developing framework for a new Agency. It will involve sustainable and dynamic coordination at different levels of operations and within different sectors of economy to ensure development and implementation of an integrated national system for food safety and quality control avoiding jurisdictional confusion. This will make the system more cost/effective and bring in accountability.

### **3.Risk Assessment**

- Building risk assessment capacity through higher level scientific inputs and achieve appropriate protection criteria;
- Development of standards and regulations; Codes of Practice etc.
- Support to scientific institutions/professional bodies for R&D work, collection and interpretation of analytical data, epidemiological data, dietary intake studies, etc.
- Data bank, including a roster of scientists and other professionals in relevant fields.

### **4.Risk Management**

- Farm-to-table approach covering different elements and stages of the food system and introducing GHP, HACCP, GMO, GAP, GAHP; to prevent or reduce food hazards;

- Development of compliance policies including among others, prevention and control of different food hazards, and long-term, short-term targets for achieving well defined goals, as necessary;
- Promotion of voluntary compliance;
- Determination and use of uniform Action Levels, traceability and recall procedures etc;
- Analytical capacity building, - targets, resources required and means of achievement;
- Manpower development plans, - training, refresher courses, training the trainers, both in public and private sectors;
- Monitoring, surveillance and evaluation in an overall integrated manner to support uniform application of protection measures;
- Data bank.

### **5. Transparency and Risk Communication**

- Improved stakeholders participation;
- Transparency in decision making;
- Community outreach programs;
- Consumer information;
- Data bank

### **6. Regulatory Impact Assessment**

- Compliance cost and benefit analysis;

This will include estimating compliance costs to the regulatory authority, compliance cost to industry, effect on volume of food supply, etc on the one hand and comparing those overall costs with health benefits, benefits to trade particularly in export earnings, and to agriculture, animal husbandry industry in terms of productivity and improved returns. It is difficult but most important, to quantify benefits in the health field in monetary terms. Such data should be collected to justify allocation of additional resources to strengthen the system.

### **7. International Relations and Obligations**

- Improved international cooperation, (global / regional)– with CODEX, FAO and WHO, Levels and frequency of participation in meetings, Follow-up action etc.
- Food import/export trade vs. obligations under SPS/TBT agreements of WTO, Equivalency agreements and MOUs, Time frame for action and targets as necessary.