



Policy Note (October 2007)

International Standards and Food Safety

This ALive Policy Note on **International standards and food safety of animal-derived products in Sub-Saharan Africa (SSA)** is the result of a multi-stage process of participatory and consultative elaboration that involved the key livestock development stakeholders in Sub-Saharan Africa.

The recommendations were endorsed by the ALive Executive Committee on September 20, 2007.

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This Policy Note was prepared by the ALive Secretariat with inputs from Francois Gary (Phylum) and comments from ALive Executive Committee members. It is a contribution to the ongoing review of livestock sector policies in Sub-Saharan Africa. This publication is available online at www.alive-online.org

Executive Summary

International standards and food safety are not enforceable in Sub-Saharan Africa.

The peculiarities of the health situation in the livestock sector in Africa make it necessary to develop a global, prioritized and suitable health safety policy, which must achieve far-reaching regulatory and organizational changes, both for monitoring agencies and for sector operators. This is an important issue that involves the preservation and conquest of the most demanding markets in Africa (tourism, urban middle-class markets). Otherwise, imports will capture these most lucrative markets.

Thus the solution is not necessarily implementing standards. However, international standards remain essential tools:

- For devising a health policy that is targeted to the African context and will move the African livestock sector closer to international standards. The standards reflect a concerted risk analysis that identifies common principles of action for dealing with a particular situation, even though the actions are suited to the local health context; and
- For maintaining requirements at a level that is internationally recognized as suitable for ensuring a satisfactory level of health safety, at a time when private initiatives are being developed, creating a superfluity of requirements.

International standards should therefore be rethought as tools:

- For formulating health policies by means of a concerted risk analysis and definition of ways of managing these risks; and
- For preserving an internationally recognized reference system to ensure a satisfactory level of health safety, which needs to be made credible at a time when private specifications are proliferating and adding to requirements.

The recommendations focus on:

- Adoption of a new health safety policy for animal products based on four tasks: risk assessment at the regional level; creation of Guides to Good Hygiene Practice (GGHPs) based on the principles of Hazard Analysis and Critical Control Points (HACCP); modernization of the body of regulations to reflect these Guides; and modernization of health monitoring agencies. Because of the resources required, it will be necessary to identify priority sectors.
- Modernization of livestock sector tools: investment in infrastructure (abattoirs, markets), traceability system, etc. that adopti priorities based on those in the recommendations of the Policy Note on subsidies and trade in animal products.
- Improvement of support for livestock sectors: offers of consultancy services and expertise, vocational training, and standardization.



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Introduction

1- The concepts of health safety for foods¹ have evolved considerably over the past 10 years, following the health crises in the main purchasing countries in the North:

- Concern about bioterrorism in the United States following the attacks of September 11, 2001, necessitating closer monitoring of the food chain; and
- Impact of the Bovine Spongiform Encephalopathy (BSE) crisis in the European Union, which revealed the need to upgrade the whole sector, starting with animal feed.

2- During the same period, overall progress in livestock sectors in Sub-Saharan Africa was limited as regards food safety (delay in upgrading the regulatory framework, insufficient monitoring pressure, difficulty of modernizing the informal sector, which is very important in the food sector). Food safety in the livestock sectors of Sub-Saharan Africa currently requires a major improvement effort, in view of the potential negative impacts both on public health and at the economic and political levels.

3- Despite this situation, some sub-sectors (fisheries, beef and veal² in southern Africa) have succeeded in exporting to developed countries, meeting ever-stricter health requirements. However, these successes have not had a ripple effect in other sectors.

4- In the context of the development of international trade, international health standards have become an essential tool for limiting the technical obstacles to trade, setting a minimum common level of requirements to be met and allowing a common interpretation of these requirements. However, it is proving very difficult to apply them in Sub-Saharan Africa: in some cases they are unsuited to realities in the region and in others they constitute another economic barrier.

5- The purpose of this Policy Note is to identify the most relevant recommendations to improve the level of food safety of animal-derived products in Sub-Saharan Africa over the next few years and to determine the role of international standards in this food safety policy.

¹ Food safety. Cf. several definitions in the last page of this note (Lexique).

² The ACP countries exported 16,111 equivalent tons of beef and veal carcasses in 2005-2006 (over 12 months) to the EU, while the quota at a reduced rate of duty is 52,100 tons. (Source: Livestock Office, using European Union data). (1)



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Issues at stake

The improvement of the health quality of animal products or animal-derived products in SSA involves several issues:

- Public health issues: health and nutrition;
- Economic issues; and
- Political issues.

• Public health issues

6- Since this Note is concerned with food safety, it will not deal with zoonoses that affect persons in contact with animals other than through food (e.g., rabies, avian flu). However, these are also an important issue, especially as they often affect disadvantaged populations with high exposure because of their fragile health, promiscuity with animals, and inadequate hygiene practice.

7- The health consequences of unsafe animal foods or foods of animal origin are numerous:

- **Food zoonoses:** animal diseases transmitted to humans through food (e.g., brucellosis, echinococcosis, tuberculosis). Because of the cost of eradication programs and the structure of free-range livestock raising, with incomplete identification of animals, it has not been possible to eradicate these diseases among herds in developing countries.
- **Collective food poisoning** caused by products contaminated during the manufacturing process, from raw material to finished product, because of the presence in the finished product of pathogenic germs or their toxins at unacceptable levels.
- **Presence of toxic residues**, whether these are drug residues or organic toxic chemicals (pesticides) or minerals (heavy metals), for which the health consequences usually take a chronic rather than an acute form. As far as drugs are concerned, maximum residue limits (MRL) are defined in terms of use on animals that respects good practices for use of veterinary drugs and consumption patterns for animal foods in developed countries by adult consumers in good health. Unsupervised practices in the use of drugs and consumption of residues by consumers in poor health may create greater risks (e.g., transfer of ivermectins to breast milk, frequency of antibiotic residues found in meat (2)).

8- In addition to these direct consequences, there are **indirect consequences on nutrition**, because inadequate health safety means that less animal proteins are available, which is harmful for the most disadvantaged populations, because of non-quality losses. For the poorest inhabitants, the choice is to buy cheap but unsafe animal foods or to do without. **The challenge of improving the safety of animal foods or foods of animal origin is therefore to make**

animal proteins more widely available to the inhabitants of SSA, including the most vulnerable ones. This also involves the preservation of family subsistence livestock rearing, which contributes significantly to protein intake in rural or peri-urban areas.

9- Although this is not the subject of this Note, **livestock rearing can also have environmental** consequences, which may also have an impact on public health. Poor effluent management may result in pollution and cause human diseases (pollution of water resources used for drinking or food processing, use of effluents vegetables for consumption that have been poorly washed).

Unfortunately, the lack of reliable indicators of diseases caused by foods of animal origin makes it very difficult to determine regional and national priorities for food safety policies.

10-The public health impact of animal food safety problems is often under-estimated. The few studies on the subject (3) have shown that the consequences are not negligible. These consequences are under-estimated because they are numerous:

- Owing to a lack of resources, studies to determine the etiology of the syndrome (fever, diarrhea) are not always completed and are limited to determining the treatment to be administered.
- The system of reporting food poisoning or notifiable diseases, including zoonoses, is often not sufficiently developed to produce reliable statistics. On the one hand, physicians do not provide the required reports; on the other hand, investigations do not permit confirmation of origin. In addition; many disadvantaged inhabitants are outside the health system.

• Economic issues

11- The economic advantages of improving the safety of animal foods are threefold:

- **Fewer losses of animal foods destroyed because they are unhealthy** (e.g., raw milk destroyed because it is unsuitable for processing, seizure of finished products.);
- **Fewer economics losses caused by human health consequences** with medical expenses and absences from work (3).³
- **Access to lucrative markets with strict health requirements**, whether markets with a high value-added in Sub-Saharan Africa (e.g., tourism, urban market of well-to-do classes) or export markets. Export constraints are connected

³ For example, it is estimated in the United States that there are between 3 million and 12 million cases of food poisoning a year with around 4000 deaths, costing between 6 billion and 30 billion dollars a year (4).



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not only with food safety criteria but also with animal health criteria (e.g., foot-and-mouth disease) [[cf. ALive Policy Note on Subsidies and Trade in Animal Products](#)].

12- While exports should not be neglected, preservation of access to lucrative markets in Sub-Saharan Africa for livestock products from the zone is an economic priority. The improvement of food safety will require financial efforts that the livestock sectors of the region will not be able to incur unless they have access to the most lucrative markets.

13- The development of export capacity capable of meeting the health requirements of developed countries **must not result in the creation of a dual-track market**, in which the domestic market is disconnected from the foreign market.

- **Political issues**

14- In recent years, **African political decision-makers have often preferred to give their populations access to cheap foods of animal origin** rather than to build local capacity to meet the needs of the population and to address the region's health issues. This has often meant that import duties on products from world markets are lower than those authorized by WTO agreements. In addition, in these countries where customs revenue provides a large percentage of government budgets, these decisions may jeopardize the sustainability of the policies pursued (e.g., comments on the impacts of the WAEMU Common External Tariff) (5).

15- The improvement of the safety of foods of animal origin also requires that, **after raising awareness through studies based on detailed data, political decision-makers must be involved in policies of support for local sectors** in their efforts to upgrade food safety.

16- This involvement of political decision-makers must be accompanied by **mobilization of consumers and consumer associations** regarding health issues related to foods of animal origin. Pressure on the authorities should not be related only to price questions but also (and essentially) to health questions.

17- **International standards are often negotiated in the context and culture of developed countries in the North.** The recommendations are not always necessarily suited to economic and climatic conditions in the South. For example, the measures recommended in these standards, such as sluicing down abattoirs to disinfect them, are difficult in Sub-Saharan contexts (water shortage) and do not take into account the specific conditions in which the abattoirs are used (short duration of slaughter, use of high temperatures to kill germs). If specific measures are to be considered as

alternatives to the international recommendations, they must be shown to be of equivalent sanitary efficiency.

18- Taking into account the increasing global trade and mobility of people, food safety policies cannot be focused only on a national approach. **Food safety** can be assimilated as **an international public good** which requires that the main sanitary risks must be managed following common principles that are accepted by the international community. This concept of international public good requires solidarity between the countries and involvement of each country to facilitate the implementation of international rules.



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Analysis of the situation in recent years

• **Market increase in demand for animal foods with stricter requirements**

19- Domestic demand for foods of animal origin in Sub-Saharan Africa has recently increased (+ 11.5% for all meats from 2000 to 2005, according to FAOSTAT data):

- As a result of population growth; and
- As a result of increased purchasing power, which is reflected worldwide in an increased desire to consume protein of animal origin, considered to be nobler.

20- This growth is considerably hampered by the economic constraints faced by a large part of the population living in poverty. This explains the modest growth in the needs of the population in Africa. **These disadvantaged populations exert very little pressure on the health quality of animal foods**, since availability at low cost is more important than health considerations. The weakness of their purchasing power makes them less demanding as regards health standards.

21- However, **markets with high added value are developing**: tourism, well-to-do classes and middle classes in the cities. These markets demand high health requirements as the international standards. In particular, this is a pre-requisite for ensuring the development of tourism, on which many African countries rely, without large-scale recourse to imports.

22- In addition, **the evolution of urban lifestyles** means that eating habits are being aligned with habits observed in other cities, **creating new health risks**:

- Development of fast-food outlets; and
- Less time spent preparing meals, as more women work outside the home.

Consumers are thus exposed to greater health risks, whereas traditional culinary practices with long cooking times protected them against the lower microbiological quality of certain foodstuffs.

It is true that urbanization is also accompanied by the development of modern distribution methods with an improved cold chain. However, such shops are often reserved for the richer classes, because the meats and dairy products offered cost more.

23- The **development of international trade** has resulted in new products being offered to meet these new (expressed or implicit) needs: (e.g., frozen meat cuts). However, importing countries must be able to assess the health risks of these

imports, in the light of their origin and distribution conditions within their countries, primarily with respect to the cold chain.

24- In recent years, several countries have seen the **emergence of consumer associations**, which are starting to exert pressure regarding the safety of foods of animal origin. Despite their limited means and experience and the influence to which they are sometimes subjected, they represent the beginning of a process of reorientation of consumer pressure towards health issues (e.g., pressure regarding the safety of chicken legs in Senegal).

25- To sum up, **global pressure to improve the safety of animal foods or foods of animal origin is still weak** in Sub-Saharan Africa. However, with the emergence of more demanding market segments, there is a risk that **two differentiated markets will be created**, in which local products may not be able to capture the segment with the highest added value.

• **A world market which offers opportunities for Africa**

26- Even if very little of the world's livestock production is yet traded internationally⁴, **opportunities exist** for the output of Sub-Saharan Africa:

- Areas with structural shortcomings are experiencing increased need for animal-derived products (Middle East, Asia);
- Opportunities exist with developed countries:
 - Opportunities under the agreement to facilitate African exports. For example, the EU had granted quotas at a reduced rate of import duty amounting to 52,100 tons of bovine meat for ACP (Africa Caribbean Pacific) countries, only 31% of which were used in 2005-2006. This example is significant, even if this arrangement will lapse with the Economic Partnership Agreements (EPAs).
 - Niche markets consisting either of immigrants attached to their culinary traditions or consumers seeking exotic fare (ethnic food).

27- These opportunities pre-suppose that the countries of Sub-Saharan Africa are able to meet the health requirements imposed by importing countries.

28- **International agreements (SPS agreements) have developed a framework facilitating international trade by recognizing the international standards as common normative systems.** Despite these normative systems, importers' health requirements are often complicated by:

- The specific interpretations of the States in each of the importing regions. For example, the United States is stricter about monitoring pathogens which have affected its territory

⁴ About 3 to 15% of livestock production, depending on the type of livestock, is traded in the world market.



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(*E. Coli* H7O157). The European Union is more concerned about questions of traceability throughout the food chain.

- The normative systems that distribution firms may impose in importing countries (e.g., Eurepgap, BRC, IFS).⁵

29- This shifting of importers' requirements, which may go beyond the international standards, **is often the result of consumer pressure**, fuelled by health crises in their geographical zone. Private importers and States bear the brunt of the complaints of consumers in developed countries. This explains the different approaches to food safety from one continent to another.

30- In conclusion, opportunities for livestock production from Sub-Saharan Africa exist in the international markets. However, these are limited by the ability to meet the specific health requirements of each importing zone. In the long term, rising fuel costs may make certain forms of transport (e.g., air transport) less attractive. **The satisfaction of national and regional demands therefore remains the priority.**

- **Insufficient improvement in the quality of animal foods**

31- For the main livestock sectors in Sub-Saharan Africa (beef, veal, and mutton and lamb), the main obstacle to the improvement of product safety is inadequate understanding of the interaction of the three main flows which characterize any food sector (cf. box on page 8):

- Because of the downward pressure on prices exerted by low-income consumers or by competition from imports, profit margins are relatively small within the sector. These margins do not always produce the resources needed for investments, including those needed to improve the safety of animal-derived products.
- In addition, the multiplicity of operators makes it difficult to implement health requirements and safety policies throughout a sector. This results in:
 - Fragmentation of livestock production;
 - Numerous intermediaries who cover the economic risk involved in selling the products and do not pass on the sanitary expectations; and
 - Processing firms with a number of operators from the informal sector who do not observe hygiene rules.

32- In this context, because of the lack or the weakness of representative professional or interprofessional organizations in these sectors, the necessary linkages do not exist for joint work on questions of general interest, such as food safety (e.g., good practice guides).

33- These problems are compounded by **the weakness of much of the infrastructure in these sectors, such as abattoirs or markets:** defective equipment, inadequate hygiene and laxity of health checks on animals, carcasses or meat.

34- However, some smaller sectors with fewer and better organized operators have developed policies for improving the healthfulness of their products. Mention may be made of peri-urban poultry sectors (Senegal) (6) or some dairy sectors (Kenya).

35- Certain countries in southern Africa manage to meet developed country health requirements by maintaining export flows which, even if the volumes are still small, give them credibility for markets to other third countries. Other export sectors, such as the fisheries sector, have been able to adapt to these requirements, sometimes at high cost for a fragile result, requiring ongoing monitoring. However, this success has done little to help the other livestock sub-sectors.

36- Investments in the animal products processing industry are often **inadequate** and are mainly **concentrated on the processing of cheap imported raw materials:** manufacture of dairy products using powdered milk, or of cured meat products using imported meat. These processors are not sufficiently involved in the improvement of local supplies.

- **An environment in the industry that does not facilitate the adoption of policies to improve animal food safety**

1 - An international set of standards that is under-used

37- In order to facilitate the development of international trade and reduce the obstacles to trade, an international set of standards has been developed (SPS agreement) at the initiative of international agencies (OIE, Codex Alimentarius with FAO and WHO, ISO), consisting of:

- Standards defining the qualitative characteristics of products (e.g., definition of butter) and their health characteristics (maximum residue limit);
- Guides and instruments for assessing food safety (e.g., definition of HACCP by the Codex Alimentarius);
- Rules on what should be done to deal with a particular pathology or health risk, both by the country concerned which has to eradicate or contain the pathology or risk and by an unaffected country which must protect itself.

This set of standards is the result of joint efforts to analyze risks and forge a consensus internationally. Unfortunately, most of these standards are rarely

⁵ The proliferation of private normative systems poses problems for importers. The large distribution multinationals recently decided to set up a system of equivalence between normative systems at a meeting in Hong Kong in June 2007.



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adopted or applied by the countries of Sub-Saharan Africa. Some consider them inapplicable because they are ill-suited to the reality of livestock sectors in Sub-Saharan Africa. For others, they are the prerequisite for African products to access international markets.

38- At the same time, the latest trends in food safety policies (e.g., the hygiene package developed in the EU) are moving towards an approach whereby health risk management can be adapted to reality and to the perception of risk. **These new policies are based on:**

- **Assessment of health risks** based on scientific expertise and independent of risk management;
- **A policy of risk management** based on the accountability of operators throughout the sector, who must place healthy products on the market, and on inspection bodies, which prioritize their monitoring activities on the basis of the risk assessment.
- **Communication concerning risks** allowing greater transparency in order to inform, firstly, the professionals who have to implement risk prevention measures and, secondly, the consumers who must be vigilant when shopping.

2 - The low level of commitment of the authorities to food safety

39- The regulatory framework of many countries in Sub-Saharan Africa has not been adequately updated for many years. It is obsolete and disconnected from the international recommendations and **does not provide the regulatory tools needed by the authorities of the countries concerned in order to adopt effective risk management policies** (inspection system, seizure, sanctions).

40- However, if the goal is to facilitate regional trade in animal foods and foods of animal origin, reform of the regulatory framework cannot be undertaken individually by each country. This is the approach successfully adopted by WAEMU for the concerted development of regulations on veterinary medicines.

41- At the same time, **the resources at the disposal of the monitoring agencies have been limited by economic adjustment policies and the choices made by States:**

- There have been staff reductions both in the deconcentrated units and in the central units, reducing resources for intervention on the ground and for coordination;
- The upgrade of inspection systems is inadequate and inspection management tools (information technology) are not sufficiently developed;

- Upgrading efforts have been mainly concentrated on export sectors;

- Moreover, inspection resources are often distributed between several Ministries (Agriculture or Livestock, Health, Trade), which do not coordinate with each other or exchange information, so that there is no global analysis of health risks throughout a sector.

42- State policies of liberalization and refocusing on its sovereign missions have been adopted without ensuring that all the means exist for verifying the proper organization of the market:

- **The liberalization of the veterinary drug market** has improved distribution of these drugs, but the authorities have no plans for oversight to ensure that they are correctly used. This accounts for the abnormally high levels of residues found at certain links in the chain.

- **The privatization of veterinary services** has led to the development of a corps of veterinarians looking after livestock. While this has had a beneficial effect on structured sectors, such as the poultry sector, the service provided to livestock breeders in zones of extensive farming has been affected [[cf. ALive Policy Note on Animal Health Service Delivery and Veterinary Public Health](#)].

43- The infrastructure supporting animal food safety policies is limited:

- The concept of a network of testing laboratories for monitoring and self-monitoring has little support at the regional level. Yet the development of resources for the analysis of residues (drugs, organic micro-pollutants) presupposes a pooling of the necessary investments⁶.
- Academic and research institutions and technical centers are not sufficiently involved in support to firms for the transmission of the health policies adopted.

⁶ For example, a Veterinary Drugs Testing Laboratory (LACOMEV) was set up in the Dakar EISMV for the West Africa zone and became an OIE reference laboratory in 2004.



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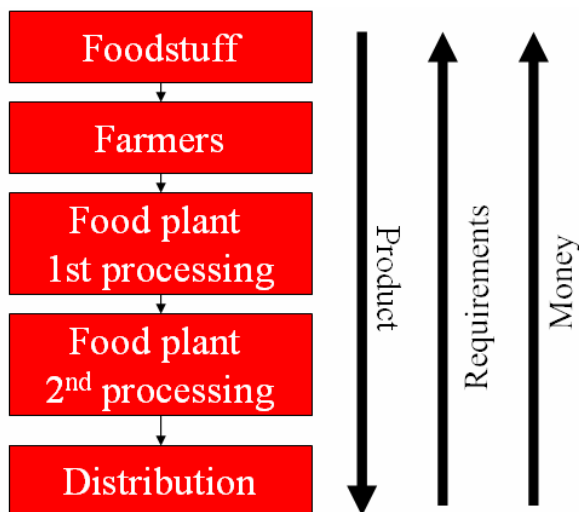
Global diagnosis of consequences and analysis of the current situation

44- With the exception of certain sectors, these discouraging findings underline the dangers of the current situation for the livestock sector in Sub-Saharan Africa:

- Operators do not have sufficient incentive or are not obliged to improve healthfulness, either because pressure from consumers or monitoring agencies is not sufficiently strong or because of competition with low-cost products;
- Investments in the sector (transformations, innovation) are inadequate to remedy the situation because profit margins are very low and many firms are small; and
- These sectors therefore have limited growth capacities to reach larger markets.

There is thus a risk that livestock production in Sub-Saharan Africa will become disconnected from lucrative markets in that zone.

Figure 1: Flows within a food chain



Three kinds of flows can be identified in a supply food chain:

- one product flow from foodstuff firms to retailers ;
- one requirement flow from downstream to upstream: consumers transfer their requirements to retailers; retailers transfer their requirements to food processors taking into account what is expected by consumers; regulatory requirements also add to the implicit consumers' requirements.
- one financial flow that allow the remuneration of the operators of all the food chains and the costs which are generated by requirements.

It is very important to understand the structure of these three flows to define an improvement strategy in the food chain. If, at one step of the food chain, requirements are responsible of over-costs not covered by the financial flow, there is gap in the balance between the three flows and the food chain will not be able to take in account these requirements.

The increase in sanitary requirements could affect financial flows and product flows.



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Recommendations for action

• What goals should be set for the safety of foods of animal origin?

1 - International standards vs regional standards

45- One view is that the goals of international standards seem to be ill-suited to the context of livestock sectors in Sub-Saharan Africa. The creation of regional standards is therefore envisaged as a means of harmonizing regional markets and exerting pressure on the international agencies to obtain recognition of the specificities of Sub-Saharan Africa. This strategy may not produce the desired effects:

- It will weaken the consensus on the subject of international standards, thus strengthening private initiatives, particularly by the main distributors, who impose their own normative system, which often goes beyond the requirements of the international standards (Eurepgap, BRC, IFS).
- It will result in a compartmentalization of requirements, which will make it even more difficult for African products to gain access to international markets.

46- On the other hand, international standards should be repositioned as a consensual tool in the service of all stakeholders (State, economic operators, consumers).

- They represent, above all, a pooling of expertise in order to assess jointly the health risk and formulate common principles for managing these risks.
- They are thus a tool which decision-makers in Sub-Saharan Africa should use to define harmonized food safety policies for the zone and a means of combating abuses by private importers.
- However, analysis of the situation specific to each sector and each region shows that these standards cannot always be adopted as a short-term goal. Interim goals and strategies must therefore be developed, in a more operational and proactive approach, adapted to suit each region (cf. 4.2.3; 4.3.3)
- Greater commitment to international standards in Sub-Saharan Africa also requires greater involvement of African experts and representatives in the formulation of these texts and agreements, so that the realities of livestock sectors in Africa can be better taken into account and the standards can be implemented more effectively after their publication.

Recommendation No. 1: Enhance the participation of African representatives in forums preparing international standards or agreements⁷. This requires:

- Greater involvement of experts (researchers, scientists, experts) and of professionals from the sectors concerned in standardization committees; and
- Capacity-building for evaluation of standards and submission of proposals reflecting the realities of livestock sectors in Sub-Saharan Africa. (cf. recommendation No. 3)

Recommendation No. 2: Enhance the ability of African standardization agencies and associated institutions (States) to provide:

- Guidance to local committees in the process of preparing a new standard, so as to enlist the views of all stakeholders in the country (authorities, economic sector operators, scientific experts);
- Regional coordination between standardization agencies in the region, so as to promote common positions in the regional normative forums; and
- Greater involvement in the dissemination of standards and support to firms for the implementation of these standards.

2 - Goals to be adopted following an evaluation of risks and economic priorities

47- The issue of international standards raises the question of the choice of health goals to be set for each sector and each geographical zone. While respecting the principles underlying the international standards, specific goals must therefore be formulated in the light of the actual health situation and following an evaluation and ranking of health risks and economic priorities. For example, the goal of reducing the incidence of *salmonella* in the poultry sector must be adapted to take into account the recognized impact on public health and the prevalence of *salmonella* in the poultry sector, increasing exposure to this risk. However, this risk assessment has a cost, which should be shared.

48- The economic dimension must be taken into account in setting health goals:

- Economic impact of the health consequences of exposing the public to the risk;
- Economic impact in terms of losses for the sectors concerned (loss of production and of access to export markets); and
- Economic impact of the measures to be taken on economic actors: impact on production costs, systems of organization, supplies.

⁷ PANSPSO : Pan African SPS Organization. Project paid by EU for the Regional Economic Communities to strength their capacities to participate and contribute at the international bodies in charge of standardization.



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49- Food safety policies for animal foods and foods of animal origin should therefore be based on the principle of risk assessment. This assessment must be made at an appropriate geographical level—often the region, which represents a set of common risks—and be based on objective scientific and technical expertise. At the regional level, it will be easier to organize more independent expertise by using experts who will not be so closely connected with a particular economic interest and by organizing a structure independent of political decision-makers.

Recommendation No. 3: Since risk assessment requires sizeable resources (expertise, research, data collection), these should be organized at the regional level in order to:

- Make use of all in-network resources available (researchers, experts);
- Produce an independent assessment; and
- Organize the research or investigations at the regional level in order to make optimal use of these resources.

This is the risk assessment which will allow the determination of the first steps in risk management in the objective to reach international standards.

In parallel with the assessment of health risks, a study of the costs of non-sanitary standards should also be one of the essential tools for setting health goals.

• **What strategy should be adopted for the rapid development of livestock sectors?**

1 - Action from stable to table?

50- The recent health crises in Europe underlined the importance of a global approach to food safety throughout the production process (e.g., the crisis in which cattle feed was contaminated by dioxins). This approach has created new requirements for food sectors, such as traceability of foods and animal movements throughout the production process, and arrangements for the withdrawal and recall of foods if defective products are found on the market.

51- Instead of adopting this approach of risk management throughout the production process, some prefer to concentrate the health risk management effort on operators downstream of the sector. This approach is appropriate for certain health risks. For example, microbiological risks can be controlled by a sterilization stage at the end of the process for preserves. However, this solution has definite limitations:

- As far as microbiological risks are concerned, the effectiveness of sterilization depends on the level of initial contamination of the sterilized products. In addition, sterilization will have no effect on thermo-stable toxins produced before sterilization.
- It does not deal with other health risks, such as the risk of contamination by residues of veterinary drugs or by

environmental pollutants (heavy metals). Monitoring at the final stage of the process by testing for these residues will rapidly prove to be too costly and ineffective.

52- The complexity of compliance with traceability requirements will depend on the organization of the sub-sectors. Speed will be essential for export-oriented sectors and for sectors which can use animals from zones where health conditions meet purchasing countries' requirements. Improving traceability should therefore lead to development of the principle of zoning to reflect epidemiological situations. For the other sectors, traceability systems should also be feasible for the transmission of vital information on the animals' farm of origin, using information obtained through slaughter controls.

Recommendation No. 4: In view of the situation of the livestock sectors, efforts to develop traceability systems should be initiated and supported, with the following priorities:

- Optimization of livestock production meeting export market requirements, in particular by authorizing zoning to reflect the health situation;
- Optimization of health data collected at the time of slaughter for better control of health risks upstream (animals' farm of origin); and
- The systems should be designed to permit information-sharing of information in the region.

2 - Develop the domestic market with export successes and by private investment

53- Several sectors have succeeded in meeting the challenge of the major importing countries' requirements (fisheries and meat exports in southern Africa). Operators and monitoring agencies have adapted to these strict requirements. These sectors should therefore set an example for others.

54- The low impact on national sectors is mainly due to the fact that animal foods are less appreciated in the national market and that there is little pressure from consumers.

55- Compared with other continents, Africa has less investment by food processing firms with international ambitions. Yet, in addition to providing capital, such firms can also contribute know-how concerning processes and food safety management and enable upstream operators to learn from their experience in structuring sectors, if their development is based on local supplies. The ability to attract such investors is a good indication of the sectors' potential.

Recommendation No. 5: Export sectors must raise the level of food safety of the other sectors, using several types of leverage:

- The infrastructure equipment constructed for these export sectors should be appropriately sized and made accessible



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to operators working in the national market (e.g., abattoir, wholesale markets);

- Animal foods from export sectors returned to the African market because of the lack of openings or because of qualitative downgrading (e.g., product conformation) must be identified for the consumer by a specific label attesting to their quality; and
- The experience acquired by professionals and monitoring agencies should benefit the other sectors: transfer of know-how, sharing of experience.

Recommendation No. 6: Policies should be developed to facilitate the establishment of and investment in international animal foods processing firms, particularly those using local supplies. This requires the inclusion of safeguards in investment policies (e.g., access to land, special tax arrangements).

3 - Professionals should be better able to safeguard their products: GGHP or HACCP

56- The improvement of food safety means that professionals should be more accountable for the health of the animals or animal foods that they place on the market. However, many firms in this sector will have difficulty assuming this responsibility without suitable support.

57- The HACCP (Hazards Analysis and Critical Control Points) method is the key instrument for the formulation of a plan to ensure food safety. It is also adapted to African livestock sectors, especially as it is based on a ranking of the dangers to be taken into account and the measures to be put in place to determine the most efficient plan. However, it cannot reasonably be assumed that each firm or micro-firm will develop its own HACCP system. Guides to Good Hygiene Practice (GGHP)⁸, based on the HACCP method, are thus essential instruments giving all operators access to the relevant measures for controlling the safety of animal foods or foods of animal origin⁹. This is the only way that small and medium-size firms can combine efforts to design a system for controlling food safety.

58- The preparation of these guides has no chance of succeeding unless it is based on strong involvement of the professionals concerned through their representative associations and is supplemented by an economic analysis of the good practices recommended from the viewpoint of their effectiveness in ensuring the healthfulness of the products. For this, they will need technical support and expert advice.

⁸ Or Good Practice Guides on Livestock Raising.

⁹ It is important to remember that tools to create GGHP have been developed by Codex, as general recommendations or specific models for specific food chain (www.codex.org).

59- For certain sectors, improvement of health risk prevention will require a think tank on ways of sharing the economic consequences of the risk management decisions imposed by the monitoring authorities, such as:

- seizures at abattoirs
- culling or vaccinations on farms in cases of epizootic disease

Recommendation No. 7: The creation of GGHPs by professional organizations in livestock sectors is the key factor for the food safety policies. The professional organizations, at each step of the food chain, must be directly involved in the conception of the GGHPs. It must be encouraged in the context of regional development programs:

- This assumes that representative organizations of professionals will be structured so as to be major players in the preparation of these guides. Inter-professional coordination at the sectoral level should also be encouraged to facilitate a global understanding of food safety problems.
- The technical and scientific centers in the region should be able to give them methodological support and expert advice to help them with the preparation of these guides.

States should encourage their professional organizations in livestock sectors to become involved in the preparation and application of GGHPs. They should approve and recognize them in order to facilitate their dissemination to all professionals concerned. The official inspection systems and the new regulatory texts should take these GGHPs into account.

Lastly, regional groups should coordinate their experience in order to facilitate concerted initiatives among the various countries. These GGHPs could be instruments for enhancing the African countries' contribution to international work on standardization (cf. recommendation No. 1).

Recommendation No. 8: Projects should create opportunities for structuring the supply of support services and expert advice to players in the livestock sectors:

- Involvement of technical centers and research centers with livestock sectors;
- Structuring of the supply of services to the livestock sector, using veterinary firms resulting from the privatization of animal health services, which can form new services to livestock sectors and their enterprises (cf. note "Provision of animal health services").

4 - Consumer associations should also be used

60- Consumer associations should also play a positive role in improving the safety of animal foods:

- They can exert pressure on professionals to persuade them to improve their practices and inform the public about unacceptable practices.



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- They can also put pressure on the authorities to make monitoring agencies exert sufficient influence on professionals through inspection measures.

61- Consumer associations can also independently relay information to the public, which may be useful to the authorities in a crisis:

- Information on appropriate behavior for consumers when purchasing and consuming: identification of healthy products, how to store products;
- Information during a health crisis on measures adopted or actions to be taken; and
- Information on actual health risks, based on studies conducted or work done.

62- In order to make consumer associations more knowledgeable, North-South and South-South cooperation with highly experienced consumer associations may be useful.

Recommendation No. 9: Support policies for consumer associations should be developed to help them to play their information and lobbying role as regards food safety. The types of support, particularly financial support, must not reduce their independence vis-à-vis the authorities and vis-à-vis special or partisan interests.

- **The key role of States in supporting this process**

1 - Reform the regulatory framework

63- Political commitments and the resources of monitoring agencies resources are contingent on reform of the regulatory framework to clarify the principles of a policy for the safety of animal products or animal-derived products and to provide a permanent framework allowing monitoring agencies to fulfil their role.

64- The drafting or amendment of food legislation must respect internationally recognized principles: separation of risk assessment and risk management, accountability of sector operators for the safety of the products they market, role of monitoring agencies to ensure that operators are putting healthy products on the market. These principles should be extended to all sectors, regardless of whether they are concerned with the domestic market or the international market.¹⁰

65- However, in addition to these principles, the system must facilitate the drafting of progressive implementing provisions recognizing the principal measures recommended in the

GGHPs drafted with the professionals and recognized by the authorities. The goal should be a panoply of regulations enabling monitoring agencies to exert pressure through inspections, acknowledging the work of professionals applying the GGHPs and effectively punishing those whose practices endanger consumer health and distort competition vis-à-vis the professionals who do respect the GGHP principles.

Recommendation No. 10: The modernization of the body of regulations of States in Sub-Saharan Africa should be encouraged in order to, firstly, define the principles of a modern food safety policy and, secondly, impose and enforce requirements based on GGHP principles through easily adaptable texts on livestock sector professionals in order to improve knowledge of risks and progress made by the sectors.

This work should provide an opportunity for each State to reaffirm the commitment by political leaders to adopt a food policy designed to ensure public health for all, while promoting the development of the efficient livestock sectors.

2 - Implement recognized, coordinated and efficient monitoring agencies

66- The introduction of new regulations must be accompanied by modernization of the monitoring agencies and of their resources (information system) in order to pursue a real policy of health risk management. The goal is to restore the confidence of:

- Third countries in export licenses;
- Consumers in the activities of monitoring agencies to supervise the healthfulness of products sold on the market and to protect their safety; and
- Professionals, by ensuring healthy and fair competition between enterprises respecting health requirements.

67- The goals are to:

- Coordinate the various ministerial departments that often intervene in livestock sectors, with the adoption of harmonized inspection methods;
- Centralize information on inspections so as to optimize their planning; and
- More generally, introduce management principles in inspection bodies: either general principles applicable to any inspection body (ISO 17020) or principles adapted to the veterinary services (OIE normative system for veterinary services).

For this purpose, methodological tools for the analysis and upgrading of monitoring agencies should be developed: tools for the evaluation of national veterinary services designed by OIE (PVS tool) and directives for improving national food monitoring systems (FAO/WHO).

¹⁰ For example, regulation 07/2007/CM/UEMOA concerning the safety of plants, animals and foods in the WAEMU region is a first step towards harmonizing the regional regulatory framework.



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68- Priority should be given to the key stages at which inspection provides information on the situation of a sector as regards health risks (e.g., inspection and monitoring of abattoirs) or on health certification to promote confidence in trading.

Recommendation No. 11: Countries should be encouraged to use existing tools to evaluate their food monitoring systems and to upgrade their inspection methods. This upgrading should be coordinated with the effort made by the professions (creation of GGHPs).

For the success in modernization of the monitoring agencies, it will be necessary to:

- Promote coordination and exchange of data between the different agencies or services involved in food inspection to define a global management risk policy for the entire food chain;
- Set up organisation's procedure that insures independence, impartiality, and competency of the monitoring agencies; and
- Develop training programs (initial education and/or professional training) for the employees in charge of inspection to improve their skills and their capacity to use new inspection methods.

3 - Facilitate sector modernization

69- The improvement of the safety of livestock sub-sectors, in particular the meat sector, also requires the construction and renovation of infrastructure: abattoirs, wholesale markets. Even if the actors in the sub-sectors must be primarily responsible for this infrastructure, the authorities can play a facilitating role as regards:

- The definition of guidelines for the creation of this infrastructure and economic feasibility studies; and
- Support for investments in the context of a public-private partnership.

70- The authorities can also play a role of facilitator to help professionals by supporting them in their collective initiatives to define GGHPs and in the development of tools for sharing the economic consequences of decisions on risk management.

Recommendation No. 12: Support for infrastructure investments should be provided in accordance with the sector guidelines formulated with sector stakeholders. The involvement of professionals concerned in the management of these tools should be developed (in accordance with the conclusions of the think tank proposed in Recommendation 4 on subsidies and trade).

Recommendation No. 13: The authorities should ensure that training in food hygiene and food safety is provided both for managers (veterinary schools, schools for agricultural or

food engineers) and for professionals through initial and/or continuous training.

Furthermore the authorities have to develop policies for communication, information, and sensitization of the actors in the food chain including the consumers, in order to have a better perception of the food safety issues by all of the African population.

• **Regional coordination and support from international organizations**

71- In view of the importance of the action to be taken within each State and in order to promote the development of harmonized policies facilitating regional trade, regional communities (WAEMU, SADC, CAEMC) have a key role to play in facilitating concerted efforts:

- Preparation of a preliminary study on the structuring of livestock sectors at the regional level;
- Design of a new regulatory framework harmonized at the regional level (e.g.,. legislation on veterinary drugs, food law, requirements for each kind of herd or food processing unit);
- Sharing experiences and creation of common tools to develop new inspection methods;
- Sharing of the different experiences of professionals (GGHPP); and
- Creation of a health risk assessment network.

This policy of concerted effort must balance the effectiveness of a supranational decision and the subsidiarity that is essential in order to adapt the general rules to the national context of each country.

72- This role should also involve coordination of decisions on tools of regional scope:

- Creation or upgrading of infrastructure such as regional abattoirs;
- Networking of the testing laboratories involved in health monitoring in order to ensure coverage of the territories and optimization of the analytical resources used; and
- Networking of research and training centers.

Recommendation No. 14: Regional Economic Communities should be closely involved in the creation and coordination of policies, particularly as regards recommendations:

1. Presence in international standardization bodies;
2. African standardization bodies,
3. Risk assessment network;
4. Compatibility of traceability systems within sectors;
7. Exchanges on GGHPs in each country;
10. Modernization of the body of regulations; and
12. Study on infrastructure investments.



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■ Ranking of recommendations

73- It will not be possible to implement all these recommendations immediately. The following table (see page 15) proposes a ranking based on two criteria:

- **A chronological priority either based on looming deadlines such as those for negotiations under way or because of the need for sequencing of activities;** and
- A strategic priority, because of the leverage effect of the measure on the modernization of African livestock sectors.

74- This analysis reveals three main groups of priorities:

- **Action must be taken on four fronts simultaneously** (Recommendations 3, 7, 10 and 11) in order to develop a new health safety policy for animal products:
 - Regional risk assessment;
 - Creation of GGHPs for key sectors;
 - Upgrading of the body of regulations, particularly in order to recognize GGHPs as soon as they are formulated; and
 - Modernization of monitoring agencies, which will undergo major changes of orientation with the introduction of GGHPs.

Since it will not be possible to work on all sectors simultaneously and since this is a long-term project, priority sectors must be selected in the light of the strategic stakes: public health risk linked to this sector, economic importance (volume of production, imports), support to professional organizations. However, one or two sectors should be upgraded every five years.

- Policies must then be put in place for the modernization of sector tools: investments in infrastructure (Recommendations 12, 6), development of traceability systems following clear priorities (Recommendation 4).
- At the same time, this plan of action should enhance support for the livestock sub-sectors, without fixed deadlines:
 - Improvement of vocational training resources (Recommendation 12);
 - Development of a supply of consultancy and expertise in this area (Recommendation 8); and
 - Capacity-building in standard-setting bodies and their greater involvement in international standards forums.



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Table 1 –Ranking of recommendations

Recommendations	Chronological ranking	Strategic ranking	Adopted ranking
1- Involvement of African representatives in international standardization	++	+++	++
2- Strengthening of African standards bodies	++	+++	++
3- Organization of a regional health risk assessment	+++	+++	+++
4- Development of traceability systems in livestock sectors	++	+++	++
5 – Optimization of the successes of export sectors: experiences, infrastructure, products from these sectors sold on the African markets	+++	+++	+++
6- Policies facilitating the establishment of foreign animal products processing firms with good know-how	++	++	++
7- Creation of GGHPs by sector and type of operator	+++	+++	+++
8.- Structuring of a supply of support and expertise for actors in the livestock sectors	+	++	+
9- Support for consumer associations	++	++	++
10- Modernization and upgrading of the regulating body in SSA States	+++	+++	+++
11- Evaluation and upgrading of inspection bodies	+++	+++	+++
12- Support for sector infrastructure investments (abattoirs, markets).	++	+++	++
13- Development of a supply of training on safety of foods of animal origin at all levels	++	+++	++
14- Involvement of regional communities in the coordination of these policies	+++	+++	+++



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Lexique

- 1- (GB) Food safety = Sécurité sanitaire des aliments (FR). In French, « sécurité alimentaire » means « food safety ». For food safety, the used expression is “sécurité sanitaire des aliments”. Sometimes, the expression « sécurité des aliments” is also used as food safety.
- 2- (GB) Monitoring agency = Service de contrôles officiels (FR). Monitoring agency means public services under the direct responsibility of the Minister.
- 3- (GB) Production stream = Filière (FR). The concept of « filière alimentaire » in French has no good translation in English. This concept means the continuous link between of the different interdependent actors of food chain from the feedmillers to the retailers. Sometimes, the expression of food chain is used as the “supply chain” defined in the industry sector.
- 4- (GB) Measures = réglementation (FR). The word « standard » in English is translated by « norme » in French. But, this word “standard” is sometimes used as regulation or legislation. To avoid any confusion in this policy note, the words of “measures” or “regulatory measures” will be used to design regulatory texts.