

**Strengthening technical capacity of Food Safety and Quality Authority of The
Gambia**

Final Project Report

Project Id: MTF/GAM/035/STF

Prepared for: The Standards and Trade Development Facility (STDF)

Prepared by: Food and Agriculture Organization

June, 2015

Background and rationale

This report is part of larger project as result of agreement between the Standards and Trade Development Facility (STDF) and the Government of The Gambia to fund the project entitled: *Preparation of a Project Proposal for enabling operational functionality of the Scientific Affairs and Food Control Directorates of the newly established Food Safety and Quality Authority (FSQA) of The Gambia.*

The SDTF approached Food Safety and Quality Unit of the Food and Agriculture Organisation (FAO) of the United Nations with the request to implement the project. The STDF and FAO agreed that appropriate implementation required comprehensive assessment of national food control system and that the STDF Project Preparation Grant (PPG) funds were insufficient for the project implementation. FAO secured additional funding and the modified project approach was discussed and confirmed with national counterparts. This approach was formalised through a formal letter of agreement between the FAO and the FSQA entitled: *Facilitation services for the assessment of the national food control system and development of an action plan to propose operational functionality of the Scientific Affairs and Food Control Directorates of the newly established FSQA.*

Objectives

The project objectives were:

1. to perform an assessment of the national food control system in The Gambia
2. to use these findings and collect additional relevant inputs to develop a proposal on how to enable operational functionality of the two critical FSQA Directorates and
3. to deliver relevant initial training geared towards scientific (risk) assessment and risk management competencies applicable to food safety.

Project methodological approach

The project objectives were implemented through various activities conducted during the mission preparation, during and in/between the three field missions. The food control system assessment of The Gambia, proposal development and value-added training was implemented by FAO team, consisting of two international and two national consultants, and FAO-Headquarter food safety officer, who was co-ordinating various activities in direct collaboration with the FSQA and FAO-G.

The main objective of the first mission (April 2014) was to establish the FSQA/FAO collaborative relationship, clarify objectives, jointly develop overall project implementation approach and to gather initial inputs (strengths and gaps in systems and data availability) from the FSQA and other relevant stakeholders. This included collection of information on the recent legislation and institutional set-up changes applicable to food safety in The Gambia, consultation with other stakeholders at the project launch workshop, and delivery of one-day training related to guidance and importance of accessing/using global and regional food safety databases, and generating/using existing national food safety data. The training session was also used to evaluate the current strengths and needs of the FSQA, specifically in terms of scientific (risk) assessment, which is one of key competencies of their Scientific Affairs Directorate, to identify relevant level of training needs within the context of the larger project, namely for the purpose of the proposal development for submission to the STDF.

The food control system assessment approach, namely tool, assessment team and on-site process were established between the first and second (August 2014) mission, with continued work on additional data collection as well as planning of on-site assessment. An on-site assessment was conducted (August 30-September 12, 2014) as part of the second mission. Data, previously collected, were verified to the best possible extent during the assessment. Additional data, information and insights were gathered through multiple interactive meetings with the FSQA, with their most relevant partners and collaborators, during a one-day stakeholder consultative workshop. In addition, a one-day training workshop covering basic principles and good practices in risk prioritisation and risk management was delivered by international consultants. The team had the opportunity to meet with the key structures established under the Food Safety and Quality Act, 2011. These structures included the management and staff of FSQA, Board of Directors of FSQA, the Scientific Committee, the Food Control Advisory Committee and the Stakeholder Consultative Forum (representing key food industry and consumer associations). The team also had the opportunity to meet with key government stakeholders who have important roles in food safety across the food chain. Those stakeholders included the Department of Veterinary Services; the Registrar of the Medicines Board, National Pharmaceutical Services, Ministry of Health and Social Welfare; National Environment Agency and the Registrar of Hazardous Chemicals and Pesticides; the Principal Fisheries Officer, Department of Fisheries; and the Deputy Chief Public Health Officer, Ministry of Health and Social Welfare. The team made field visits to fish landing sites, horticulture gardens, processing plants, various types of informal and formal markets, retail stores and ready to eat outlets to form insights on the current level of hygiene and measures applied in various types of settings. The team presented summary findings and preliminary recommendations to the FSQA at the mission wrap-up meeting (September 2014). Concurrently, the proposal development process was explained, discussed and proposed steps and tentative timelines were agreed upon on the review process and finalisation of draft assessment report and draft project proposal.

Between the second and final (third) mission performed in an early December 2014, the assessment/proposal development team developed a draft assessment report and draft proposal (including requested STDF proposal narrative, logical framework, budget and

annexes), which were shared with the FSQA for two review rounds of comments and finalised and agreed upon shortly after the last mission. FAO and the FSQA co-ordinated all aspects of the project planning, implementation and completion.

Project results

Brief summary of food control system assessment

The comprehensive report of FAO assessment of Gambia's national food control system was shared, reviewed, resulting in only minor editorial comments, and accepted by the FSQA. The report is confidential and as such is only shared with Gambia's FSQA. The list of summary recommendations is shown in Appendix I.

The assessment/project proposal team was pleased to find that national direction for food safety and some infrastructure of the FSQA are established; although recruitment of key scientific and managerial positions remains challenging, which limits possibility for delivery of comprehensive and essential food safety training resulting in ability to establish the necessary and sustainable plans to establish, implement and evaluate food chain safety programmes and activities. The key bodies, established under the Food Safety and Quality Act, 201, include the Board of Directors of FSQA, the Scientific Committee, the Food Control Advisory Committee and the Stakeholder Consultative Forum (representing key food industry and consumer associations) and are still in the initial stages of formation. Through meetings with the different stakeholders, serious deficiencies in food chain safety control were observed indicating an urgency to clarify roles and responsibilities under the new Food Safety and Quality Act.

While the FSQA has been identified as the organization in The Gambia with authority and responsibility for the overall official control of food safety and quality in The Gambia, the other government stakeholders need to be considered and incorporated in order to develop a sustainable national policy. As the Government of The Gambia has repealed or is in the process of repealing all other legislation regarding food safety, it will need to establish comprehensive regulations to replace or incorporate this other legislation under the Food Safety and Quality Act as well as MOU's, and/or delegation by the Authority for some of its responsibilities to public or private bodies or persons as provided under the Act. This will need to occur quickly to ensure a comprehensive, effective and coordinated approach to food safety. As well, the FSQA will need to make appropriate arrangements to monitor the implementation of activities by the delegated authorities, including the preparation of annual inspection plans and reports that are subject to the approval of the Authority.

Considering all of the above, it is recommended that the FSQA lead the development of a National Strategy for Food Safety. The strategy should include:

- A national strategy for food control with defined objectives, a plan of action for its implementation, and milestones;
- Development of appropriate food regulations, or revision of the existing legislation to achieve the objectives defined by the national strategy;
- Development or revision of food regulations, standards and codes of practice as well as harmonizing these with international requirements;

- A programme for strengthening food hazard and food borne disease surveillance and control systems;
- Promotion of systems for improving food safety and quality along the food chain, e.g. good agricultural and hygienic practices, introduction of HACCP-based food control programmes;
- Enhanced inputs into research, food borne disease surveillance, and data collection, as well as creating increased scientific capacity within the system; and
- Promotion of consumer education and other community outreach initiatives.

The attainment of an effective food control system requires knowledge of the current situation in The Gambia and the development of such a strategy. The preparation of a national food control strategy enables the country to develop an integrated, coherent, effective and dynamic food control system, and to determine priorities which ensure consumer protection and promote the country's economic development. The Strategy would prevent confusion, duplication of effort, inefficiencies in performance, and wastage of resources.

Devising strategies for food control with clearly defined objectives is not simple, and the identification of priorities for public investment in food control can be a challenging task. The strategy should be based on multi-sectoral inputs and focus on the need for food security, and consumer protection from unsafe adulterated or misbranded food. At the same time it should take into consideration the economic interests of the country in regard to export/import trade, the development of the food industry, and the interests of farmers and food producers. The collection of epidemiological data on foodborne illness is an indispensable component of such assessment and should be done whenever possible.

Strategies should use a risk based approach to determine priorities for action. Areas for voluntary compliance and mandatory action should be clearly identified, and timeframes determined. The need for human resource development and strengthening of infrastructure such as laboratories must be also considered and addressed.

Certain types of food control interventions require large fixed capital investments in equipment, and human resources. While it is easier to justify these costs for larger enterprises, imposing such costs on smaller firms who may coexist with larger enterprises may not be appropriate. Therefore the gradual phasing in of such interventions is desirable. For example, countries may allow small enterprises longer periods of time to introduce HACCP-based food control programmes.

Development of STDF proposal

The analytical background approach included a review of health and socioeconomic issues impacting on foodborne hazards, consumers concerns, and the growth of industry and trade, as well as identification of the functions of all sectors which are directly and indirectly involved in ensuring food safety and quality and consumer protection.

The proposal, was developed in engaging manner and in close co-operation with the FSQA and their main collaborators. FAO assessment approach and resulting report

served as the main foundation to inform various components of the proposal according to the STDF requirements. These were project grant application, logical framework, budget, terms of references for national/international consultants) and three appendices, which were generated from the FAO assessment report (e.g. list of recommendations, levels of advancement for various competencies, logical framework outputs) served as transparent and credible foundation for indicating how the proposed project activities would allow the FSQA to move for priority competencies into the higher advancement levels and through the measurement of specific indicators/targets.

The proposal was submitted to the STDF by FSQA in January 2015, according to the mutually agreed, slightly delayed deadline of January, 2015. This allowed timely project proposal submission for funding consideration of the STDF.

Conclusions and recommendations

There is much work to be undertaken to strengthen the capacity of The Food Safety and Quality Authority (FSQA) to enable the Authority to provide adequate food chain safety programs. This is crucial for the protection of public health and the expansion of much needed trade. Presently, The Gambia is not in the position to meet its obligations and accrue the benefits associated with the WTO Agreement on the Application of Sanitary and Phytosanitary Measures and the Agreement on Technical Barriers to Trade due to deficiencies in its food safety and quality capacity. There is a need to support Gambia's initial efforts to improve national food chain safety control system based on international standards, guidelines and recommendations, and to establish functional scientific assessment and risk management capabilities/capacities (which are captured in the proposal developed and submitted to the STDF) to enable The Gambia to expand its export potential and protect public health.

Appendices

Appendix I: FAO Assessment tool: List of recommendations following assessment

Over-arching (system and FSQA level)

1. Develop national strategy for food control for all segments of the food chain, including clearly defined vision and priorities. The Strategy should define clear roles and responsibilities of all stakeholders, the process for their engagement and consultation, delegation of authorities, chain of command, technical and functional relationships, co-ordination mechanisms and schedule for review. It should also include a process to establish and implement risk-based priorities.
2. Strengthen the existing national institutional and legal framework for food control; outline the process for drafting, reviewing, prioritizing and adopting laws and regulations, including RIA, and establish capacity for drafting technical regulations, within the FSQA, through developing selected priority technical regulations.
3. Facilitate development and implementation of national strategy for food control laboratory testing and epidemiological food-chain surveillance to enable credible identification and analyses of priority hazards and the assessment and prioritization of food risks.

FSQA level

4. Establish urgently an adequate critical mass of experienced scientific and technical staff with experience in:
 - drafting technical regulations and policies
 - drafting food control/risk inspection procedures
 - identification of potential hazards, epidemiological surveillance, conducting risk assessments, and data management
5. Facilitate timely and effective delegation of some activities to competent authorities or persons to ensure that there is adequate food safety oversight, control and resources across the food chain. This would also preclude possible disruptions in the existing food control activities or lack of control that could emerge due to the recent changes in food control mandate.
6. Develop MOUs with delegated competent authorities providing clear responsibilities, expectations, standards to be utilised, and reporting requirements.
7. Develop and provide information, educational materials, advice, training and other appropriate information for all industry stakeholders and for consumers to ensure that they understand basic hygiene requirements for the control of hazards potentially associated with various foods and production/processing practices. Consideration should be given to more effective utilization the Stakeholder

Consultative Forum where food associations could disseminate educational and training materials to their members.

8. Strengthen the FSQA procedures for facilitating the work of the Stakeholder Consultative Forum, Scientific Committee, Scientific Working Groups, including the development of measurable work plans and the process for on-going evaluation of their effectiveness.
9. Strengthen the FSQA procedures for engaging with international stakeholders responsible for food safety (e.g. WTO/SPS, FAO/WHO Codex, OIE, trading partners, regional organizations etc.) to obtain and disseminate information and identify best practices to appropriate stakeholders.
10. Develop and adequately resource staff continuing education programs and career development plans.
11. Develop a list of local, continental and international training institutions and organizations, indicating potential collaboration and communication mechanisms, and establish immediate agreement on food safety collaboration with selected training institution(s) where possible.
12. International information e.g. INFOSAN should be utilized to identify potential food safety hazards that may affect food safety in The Gambia.

Scientific Affairs Directorate (SAD)

13. Build immediately easily accessible (small but effective) paper and electronic-based library of key texts, documents and web resources for the FSQA/Scientific Committee to use for initial start-up activities. Include training in literature searching and purchase of full-text scientific papers during subject research, building an organised literature database accessible to scientific staff (e.g. in bibliographic software such as Mendeley, Endnote).
14. Ensure that key electronic resources, both internal and external documents are immediately available for stakeholders on the new FSQA web page.
15. Develop a more formal information and documentation system (subject to periodic review), with procedures for collecting, storing, manipulating, and accessing data and documents.
16. Identify and prioritize the (initially microbiological and chemical) hazards important for food safety in The Gambia, specifically:
 - a. Conduct a desk-based exercise to develop a potential hazard list in foods
 - b. Conduct a scientific and stakeholder exercise to prioritize hazard/food combinations

- c. Develop risk profiles for priority issues to;
 - c.i. Inform interim risk management
 - c.ii. Identify key stages in the supply chain where data on hazard prevalence and concentration would be best gathered, for priority combinations (baseline survey)
 - d. Conduct baseline analytical surveys of priority hazard/food combinations, where interim risk management is not considered to be effective, using a sampling strategy based on statistical advice, procedures, and available competent laboratory capabilities
17. Develop on-going monitoring and surveillance plans, based on hazard priorities, taking into consideration the competence and capacity of available laboratories.
18. Determine the key capabilities and resource levels required to deliver the activities of the Scientific Affairs Directorate (SAD), and the skills that underpin the capabilities. Similarly determine the level of knowledge and support required for the Scientific Committee to deliver its remit.

Capabilities common to risk analysis activities can include the following:

- Conducting peer-reviewed risk profiles
 - Conducting peer-reviewed qualitative risk assessments in multiple disciplines (microbiological, toxicological, allergies, physical hazards)
 - Designing new semi-quantitative approaches and conducting semi-quantitative risk assessments
 - Expert elicitation
 - Stakeholder mapping and communication
 - Benefit-cost analysis
 - Multiple criteria decision-making for risk management
 - Validating risk management controls
 - Verifying risk management controls
 - Communicating risk concepts to stakeholders
 - Media management
19. Improve the capability of the Scientific Affairs Directorate (SAD) in the following key skills:
- a. Scientific/research methods, including critical appraisal of scientific / technical literature
 - b. Food safety
 - b.i. Food microbiology/chemistry/toxicology characteristics and control measures
 - b.ii. Food production and manufacturing systems
 - b.iii. Food safety management systems e.g. GAP, GHP, HACCP
 - c. Food supply chain mapping

- d. Applied epidemiology
 - e. Surveillance
 - f. Predictive microbiology
 - g. Mathematics and statistics
20. Develop policies and procedures for the approaches to the various risk analysis components (risk assessment, risk management and risk communication)
21. Develop expertise, plans and the means (e.g. website) for communication of risks.

Food Control Directorate (FCD)

22. Develop adequate and appropriate risk-based inspection standards across the food chain to enable effective, consistent and transparent assessment and compliance actions. This should include:
- a. Improved process for registration of veterinary medicines and pesticides to ensure the safety and suitability of veterinary medicines and pesticides used in The Gambia.
 - b. Development and implementation of on-farm food safety programs or good agricultural practices to ensure appropriate control of veterinary drug and pesticide residues, and other chemical contaminants and pathogens that may be introduced at the primary production level.
 - c. Development and implementation of effective hygiene requirements and controls during transportation and storage to prevent contamination, and ensure adequate temperature control through the cold chain.
 - d. Develop and implement specific food safety requirements for different types of food processing operations e.g. dairy, meat, other food processing and preservation operations etc.
 - e. Develop and implement improved hygiene requirements and controls at retail food markets, restaurants, and institutions.
 - f. Develop and implement food hygiene and safety controls for imported foods based on both country risk and priority hazard/food combinations. This would include development of good importing practices and regulatory requirements and a risk-based approach to import inspection.
 - g. Develop and implement improved controls of exported foods. This would include a credible certification scheme developed utilizing Codex guidelines and underpinned by the development of regulatory requirements and effective inspection and analysis of exported foods. Clear processes, including specific requirements should be established for export certification.
23. Complete staffing of the Food Control Directorate with a full complement of officers as well as consider delegation of some activities to competent authorities

or persons to ensure that there is adequate oversight and resources for food control activities across the food chain. This would preclude possible disruptions in existing food control activities that could emerge due to the recent changes in food control inspection mandate.

24. Training should be undertaken to ensure that food control officers/inspectors have knowledge and competencies in the following areas:
 - a. Relevant laws and regulations;
 - b. Food safety and quality systems;
 - c. Food processing methods and technologies
 - d. Food microbiology & chemistry
 - e. GAPs, GMPs, prerequisite programmes; HACCP system
 - f. Properties and effective use of cleaning and sanitizing compounds;
 - g. Hygiene practices, including personnel hygiene;
 - h. Inspection techniques;
 - i. Risk-based inspection and surveillance;
 - j. Food sampling techniques and testing methods;
 - k. Compliance actions and verification;
 - l. Good communication skills;
 - m. Conflict resolution

25. Training should be provided for food control management in the following areas:
 - a. Planning, supervision, and/or coordination of food inspection and certification programmes;
 - b. Evaluation of inspection and monitoring/surveillance reports and programmes;
 - c. Staff evaluation;
 - d. Leadership and supervision

26. Develop risk rating approach, including review mechanism, and implement an effective risk-based inspection program, encompassing requirements for appropriate preventive food safety standards and controls. This should include development of inspection methods, SOPs and risk-based compliance policies to guide inspection staff within the Food Control Directorate, and for delegated competent authorities to ensure consistency and effectiveness of inspection activities.

27. Facilitate development of plans and procedures in conjunction with other relevant parties to ensure effective management of outbreaks and food safety emergencies, including the development of effective traceability and recall system requirements for industry.