

Technical document

Use of third-party accreditation programs to support national food safety systems: challenges and opportunities

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FDA	Food and Drug Administration (United States)
FSA	Food Standards Agency (United Kingdom)
FSMA	Food Safety Modernization Act
FSP	Food safety passport
GFSI	Global Food Safety Initiative
IICA	Inter-American Institute for Cooperation on Agriculture
IPPC	International Plant Protection Convention
LAC	Latin America and the Caribbean
NFSS	National food safety systems
NVWA	Netherlands Food and Consumer Product Safety Authority
OIE	World Organisation for Animal Health
PPP	Public-private partnerships
STDF	Standards and Trade Development Facility
TAP	Third-party accreditation program
VQIP	Voluntary Qualified Importer Program
WTO	World Trade Organization

1. Context

As its share of the global agrifood market continues to grow, Latin America and the Caribbean (LAC) will play an even

bigger role as a global supplier of food and agricultural raw materials to the rest of the world. To do so, however, it will have to make improvements in areas such as rules that are a barrier to trade,

infrastructure and regulations (ECLAC *et al.* 2017). This situation means that national food safety systems (NFFS) will have to exert greater and more effective control of food and agricultural raw materials, for the local market and exports, in order to ensure that public health is protected, but without erecting unnecessary barriers to trade.

Since the entry into effect of the Agreement on the Application of Sanitary and Phytosanitary Measures of the World Trade Organization (WTO), countries have been required to base their measures on risk assessment, and promote inspection processes that do not involve unfair delays that constitute unjustified constraints to trade. This legal condition is also reflected in the international standard-setting organizations (the OIE, Codex Alimentarius and the IPPC). Similarly, the Technical Barriers to Trade Agreement aims to ensure that regulations, standards and testing and certification procedures do not create unnecessary obstacles.

These market, institutional and legal conditions create opportunities and pose challenges for NFSS, obliging them to broaden their control processes in order to guarantee safe food for consumers, usually with small budgets and limited personnel. In the circumstances, the only option for NFSS is to adopt mechanisms that make their food control processes more efficient, such as the use of third-party accreditation programs (TAP) with the participation of the private sector.

In order to do so, the competent authority and any officially recognized bodies undertaking compliance and enforcement activities on behalf of the competent authority should be resourced sufficiently and transparently to enable the national food control programs to achieve their objectives without compromising their integrity and independence. Third party providers may be approved or authorized to implement the national food control system. The competent authority must have the capacity to supervise and control third party providers (FAO and WHO 2013).

2. Some experiences with the use of third-party accreditation to support national food safety systems

The health authorities of the countries have implemented a number of initiatives related to the use of third-party accreditation to broaden food supervision and ensure the safety of goods traded. The largest number of experiments have been carried out in laboratories and as part of supervision processes at borders and in slaughterhouse inspections, etc. In some cases, the terms “delegation” or “authorization” are also used in relation to private services.

Within the framework of animal health and veterinary public health, the World Organisation for Animal Health (OIE) promotes public-private partnerships

(PPP), given their potential to improve animal health and welfare policy development, and the implementation of services in the veterinary domain. While governments remain responsible for the policies that they adopt, fully involving relevant private sector stakeholders makes it possible to generate more experience and involve the private sector in the design of proposals. The OIE includes all the activities of public and private sector organizations that offer services in the veterinary field. However, the involvement of each of the two sectors varies considerably from country to country, and coordination between public and private actors is often limited (OIE 2019).

In this document, we describe a recent food safety initiative that is having a significant impact on the food exports of countries in the Americas. It is related to the Food Safety Modernization Act (FSMA) of the U.S. Food and Drug Administration (FDA), which includes the Accreditation of External Auditors Program. This legislation establishes the framework, procedures and requirements for the accreditation bodies that wish to apply for recognition by the FDA, and the requirements for third-party certification bodies seeking their accreditation. The FDA also has a Voluntary Qualified Importer Program (VQIP) that offers inspection services and the expedited entry of food for importers that agree to participate in the program voluntarily. This means there is increased responsibility at the point of origin, with the parties in charge of inspections opting for voluntary

certification so that the processes are more expeditious (FDA 2019).

The Global Food Safety Initiative (GFSI) is a community of the main actors in the global food industry that promotes continuous improvement in the food safety systems in which the various parties are involved. The GFSI has spent 16 years developing a food safety passport (FSP). This system involves certifiers and accreditors that can even be government actors. GFSI certification is based on third-party auditing by a GFSI-accredited certification program. The programs include Global G.A.P., SQF, Canada GAP, Primus GFS and BRC Global standard, among others.

Other efforts linking the work of the public sector with private initiatives are as follows:

- The Netherlands Food and Consumer Product Safety Authority (NVWA, Nederlandse Voedsel- en Warenautoriteit) works closely with the food sector and private certification bodies, and promotes the establishment and utilization of self-inspection systems in the sector. When groups of companies or sectors opt for inspection by external agencies, the NVWA bases its supervision on those inspections in order to determine whether the reliability of the data is guaranteed (certification).
- The United Kingdom's Food Standards Agency (FSA) has

adopted a new method of farm inspections, the frequency of which depends on whether farmers are signed up to agricultural quality assurance systems. These are voluntary systems under which periodic independent inspections are carried out to verify whether farmers and growers meet the safety and welfare standards declared in the production of primary products. Those systems are applied to more than 85% of the production of milk, eggs, chicken, pork and crops harvested with combine harvesters in the United Kingdom, and to more than 65% of beef, lamb and horticultural production (FSA data). The use of agricultural quality assurance systems to determine the frequency of inspections is part of the simplification program aimed at reducing the administrative burden that companies face. In this way, food safety monitoring costs are reduced.

Mindful of the benefits of TAP for NFSS, the governments of Honduras and Belize applied for resources from the Standards and Trade Development Facility (STDF) to develop a proposed pilot project on how third-party assurance programs can be used in practice to improve food safety objectives.

3. Opportunities

The use of TAP to support NFSS mainly provides the following opportunities:

a. Improved protection of public health and trade facilitation

The data generated through the use of TAP makes it possible to carry out a more effective risk management process, based on which the NFSS can adopt sanitary measures to protect consumer health. The decisions taken also help to improve their performance and may contribute to the retention of existing markets or optimize access to new markets through the establishment of equivalence agreements or recognition mechanisms that facilitate trade in food with trading partners.

b. Increased coverage of NFSS actions through the optimization of public and private human resources

Implementing a TAP helps to establish actions aimed at improvement, programs and activities with different private sector actors (training and technological innovation, among others). Based on the information generated and compliance with the established requirements, food operators may benefit from a reduction in the number of inspections (CCFICS 2018), and the establishment of programs and services in response to the needs identified. In addition, third-party voluntary assurance bodies can promote the signing of information sharing agreements, as well as the delegation of certain activities currently carried out by the NFSS.

Given the challenges that NFSS face with regard to human resource hiring policies, these programs could generate the information needed to work on a planning process aimed at identifying human capital investment priorities in the short, medium and long terms. In this way, the operational coverage of the government service can be broadened, and priorities established for intervention and the use of the resources allocated based on the risks identified.

c. Use of accreditation program data and information by the health authorities (NFSS)

The results of the utilization of TAP provide NFSS with useful data and technical information for the risk assessment process, and for the preparation of more precise risk profiles of food products that make it possible to identify sectors requiring attention, prioritize the risk-based frequency of inspections and monitoring (CCFICS 2018), and carry out science-based work to anticipate sanitary problems or situations that threaten, damage or benefit public health or trade in foodstuffs.

d. Efficient allocation of available financial resources

Based on the information generated by TAP, NFSS are in a position to allocate the financial resources available to the areas identified as being most at risk, an aspect that also makes it possible to

broaden and improve the coverage of inspection programs and the monitoring and supervision of compliance with the pertinent regulations, and thus promote the development of initiatives designed to protect public health.

4. Challenges

The challenges of particular importance in the development of TAP to support NFSS are described below:

a. Strengthening of NFSS capacity to manage TAP

The countries' NFSS need to strengthen their technical and human capabilities for the formal recognition of the competence of other agencies to which they can delegate some of their services, such as inspection. In this regard, TAP include activities involving joint work with the accreditation agencies, the design and implementation of third-party accreditation processes, and the monitoring and periodic evaluation of the work of accredited bodies, among other processes. Although there have been TAP experiences in the countries on different subjects, the NFSS usually need to develop and strengthen new competences to deal with these processes.

b. Ensuring the credibility of, and trust in, TAP

The NFSS should establish standards and management systems that ensure

that the TAP function effectively in the countries and guarantee the transparency of their procedures and results for all stakeholders.

It is necessary to properly define the roles and responsibilities of the parties, the security and confidential use of the data generated, the levels of information sharing, and the supervision mechanisms, to ensure the competence and effective performance of the TAP and prevent possible conflicts of interest.

c. Strengthening of the countries' accreditation bodies

The countries' accreditation bodies should be strengthened to equip them to evaluate and accredit the bodies that participate in the TAP, based on the pertinent international standards. These bodies should have the capacity to carry out peer evaluation processes, which will provide greater confidence.

d. Public and private investment in the development of TAP

Meeting the challenges mentioned above calls for a series of costs associated with the design, implementation and maintenance of the TAP in the countries.

These costs need to be covered mainly by public institutions and the private sector. The benefits of their implementation, reflected in more efficient NFSS, the improvement of public health and trade facilitation, can be elements that more than compensate for the cost.

e. Management of knowledge derived from the work experiences of NFSS and TAP

It is recommended that the work experiences of existing NFSS and TAP in the countries of the region be evaluated and systematized to demonstrate the costs and benefits of these initiatives, to facilitate their analysis and application in the countries.

IICA's work

The Inter-American Institute for Cooperation on Agriculture (IICA), through its Agricultural Health and Food Safety and Quality Program, promotes all initiatives designed to improve the efficiency of NFSS, in particular through third-party accreditation processes, adhering to standards and mechanisms that guarantee all stakeholders the transparency of their procedures and results.

6. References

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