

**International Conference on Infrastructure Needs For a Food Control System:
Roadmap For Regional Harmonization**

**December 9-10, 2014
Hotel Royal Plaza, New Delhi**

WELCOME ADDRESS

By

**Mr. D. H. Pai Panandiker
Chairman, ILSI – India**

It is a pleasure for me to welcome you to this **International Conference on Infrastructure Needs for a Food Control System: Road Map for Regional Harmonization** organized by ILSI-India and ILSI-Japan along with Ministry of Agriculture, Forestry and Fisheries (MAFF), Government of Japan in association with Food Standards and Safety Authority of India and Export Inspection Council, Government of India.

I am sure most of you are familiar with ILSI. Just to reiterate, ILSI is an international scientific foundation with Headquarters in Washington DC having focus on nutrition, food safety, agricultural sustainability, biotechnology, environment and risk assessment. ILSI has 16 regional branches the world over apart from the Health and Environment Sciences Institute. ILSI Research Foundation along with Centre for Risk Science Innovation and Application, Centre for Environmental Risk Assessment and the Centre for Integrated Modelling of Sustainable Agriculture and Nutrition Security undertake and support research with the final objective of using science for promoting health and wellbeing. ILSI has consultative status with FAO and NGO status with WHO. ILSI-India which represents South Asian Region has similar objectives and works closely with Government, Academia and Industry. This tripartite approach has made it possible to develop an integrated practical program to address public health issues.

Food quality and safety standards vary from country to country. Had the food control systems been guided by science alone, there would possibly be less room for differences even though science governing food control system is still evolving. Differences in standards exist due to other considerations, mainly economic. Greater the safety higher the cost of food. Still, there are minimum standards that need to be observed and efficiently implemented.

The objective of harmonization of food standards is two-fold. **First**, to ensure that food that is consumed is nutritious and safe and does not pose any health hazards. **Second**, to facilitate food trade among countries by ensuring commonly acceptable safety benchmarks and prevent countries from using safety standards to discourage imports from other countries. Such standards have been developed by Codex and accepted by WTO. Hence harmonization among a group of countries will be facilitated if it is done keeping Codex as the reference point.

Different countries have taken the lead to bring about harmonization in the geopolitical nation groupings. In Asia, Japan took the lead to collect information about food standards beginning with three countries Japan, China and South Korea. This program was later extended to other Asian countries.

ILSI-India had also taken the initiative to bring about harmonization of food regulations in the SAARC region. With support from ILSI Global and FAO we brought together the SAARC countries to agree and take steps to harmonize food standards. That was way back in 1999. We had four meetings in India, Nepal and Sri Lanka. SAARC countries were committed to harmonization and the stage was set for vertical and horizontal harmonization. This is an ongoing process and I am happy that we are going to review the situation and facilitate further work.

Harmonization presumes that each of the participating country has a national food control system, with legal provisions, infrastructure for food hygiene, a surveillance mechanism to detect and eliminate water and food contamination, and food labeling to inform the consumer about composition of packaged foods. The safety norms can vary from country to country but the existence of a food control system facilitates harmonization.

Commonality of standards has to be at two level: vertical and horizontal. Vertical standards are about standards for individual food products and are grouped under major categories in the Codex system such as fresh and processed fruits and vegetables, milk and milk products, meat and meat products, fish and fish products, poultry products, fats and oils, etc.

Horizontal standards apply to all product categories and include standards for food additives, food contaminants, food hygiene, pesticide residues, residues of veterinary drugs, food labeling, food inspection and certification, methods of sampling and analysis, and so on.

To implement these standards and ensure that they conform to the benchmarks, countries have to have the necessary infrastructure which would include laboratories with qualified equipment, trained manpower, accepted analytical methods and documentation following good laboratory practices. While harmonization of standards is more a policy matter, infrastructure requires huge financial investment. Some of the countries do not have the necessary infrastructure to effectively implement food safety. We have therefore planned a special panel to discuss infrastructure issues which will identify the gaps that exist and how they can be made up.

Harmonization, as I said earlier, facilitates food trade. Codex standards have been accepted by World Trade Organization as benchmarks and are useful guides to set food quality and safety targets for Asian countries. Backed by post market surveillance, harmonization can substantially increase trade within the region and trade with other countries. The region is surplus in rice, vegetables, fish and meat and deficit in wheat, pulses, edible oils, sugar, and fruits. SAARC has a proposal to set up a Food Bank to help expand food production and trade. Harmonization of food regulations is necessary to expedite these efforts.

Harmonization of food standards with Codex supported by infrastructure will promote public health and cut health care costs by reducing the incidence of disease and at the same time facilitate trade within the region and the rest of the world. What is needed most is political will. With cooperation between governments it should be possible to adopt common quality and safety standards which can be implemented, if necessary by having common infrastructure facilities.

This Conference will, I hope, after deliberations, draw up a road map for harmonization of food control systems in the region in public interest.

“International Conference on Infrastructure Needs
for a Food Control System:
Roadmap for Regional Harmonization”

Introduction and Background of the ILSI Japan/MAFF Project

December 9, 2014 New Delhi, India
H. Hamano, ILSI Japan

ILSI Japan / MAFF Project

Overall Objectives:

- To investigate Legal Framework on Foods and Food Additives in Asian Countries for the purpose of supporting food industry to expand overseas businesses in the fast-growing markets of emerging countries
- To facilitate harmonization of food regulations /standards and fair trade, and further to help secure food safety within Asian region, by disseminating and sharing information investigated

2014 ILSI Japan / MAFF Project on Food Regulations: Summary of Countries and Items to Investigate

Countries	Legal Framework on Foods	Commodity Food Stds	Food Additives	Seasonings and Condiments	Non-alcoholic Beverages	Health Foods	Milk Products	Alcoholic Beverages	Food Labelling	Pesticide Residues
Codex	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙
ASEAN	Indonesia	⊙	⊙	⊙	⊙	⊙	⊙		⊙	⊙
	Malaysia	⊙	⊙	⊙	⊙	⊙	⊙		⊙	⊙
	Singapore	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙
	Thailand	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙
	Philippines	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙
	Viet Nam	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙
	Cambodia	⊙	⊙	⊙						
	Brunei	⊙	⊙	⊙						
	Myanmar	⊙	⊙	⊙						
	Lao PDR	⊙	⊙	⊙						
China	⊙	⊙	⊙	⊙		⊙	⊙	⊙	⊙	⊙
Korea	⊙	⊙	⊙	⊙	⊙				⊙	
India	⊙	⊙	⊙		⊙	⊙	⊙		⊙	⊙
Sri Lanka	⊙	⊙	⊙							
Nepal	⊙	⊙	⊙							
Bangladesh	⊙	⊙	⊙							
Taiwan	⊙	⊙	⊙	⊙	⊙				⊙	⊙
Hong Kong	⊙	⊙	⊙	⊙	⊙				⊙	⊙

⊙ 2009-2013 Project

⊙ 2014 Project

2014 ILSI Japan / MAFF Project on Food Regulations: Summary ①

Fiscal Year	Investigation Items	Countries Investigated	Workshop / International Conference	Date and Place
2009 (I)	Legal Framework of Foods; Specification & Standards for Instant Noodles, Carbonated Soft Drinks, and Prepared Frozen Foods	Codex, Japan, Korea, China, Malaysia, Singapore, and Philippines	“Investigation of Commodity Food Standards and Methods of Analysis in Asia”	March 29, 2010, Tokyo, Japan
2010 (II)	Plus Cow’s Milk, and Methods of Analysis on those Standards	Plus Indonesia, Thailand, and Vietnam	“Sharing Information on Food Standards and Resource and Environmental Conservation in Asia Pacific”	March 4, 2011, Bangkok, Thailand
2011 (III)	Plus Legal Framework of Food Additives; Conditions of Use, and Halal Certification	All the above	“Sharing Information on Food Standards in Asia”	February 21, 2012, Jakarta, Indonesia

**Workshop for the 1st Term Project on
“Investigation of Commodity Food Standards and
Methods of Analysis in Asia” March 29, 2010, Tokyo**



**International Conference for
Sharing Information on Food
Standards, Resource and
Environmental Conservation for
Food Industries in Asia-Pacific**



**International Conference for
Sharing Information on Food Standards
in Asia
February 21, 2012,
Jakarta, Indonesia**



**March 4, 2011,
Bangkok, Thailand**

2014 ILSI Japan / MAFF Project on Food Regulations: Summary ②

Fiscal Year	Investigation Items	Countries Investigated	Workshop / International Conference	Date and Place
2012 (IV)	All the above	Plus India, Bangladesh, Nepal, and Sri Lanka	“Regulatory Framework and Case Studies of Foods and Food Additives in India, Bangladesh, Nepal, and Sri Lanka”	February 22, 2013, Tokyo, Japan
2013 (V)	Plus Functional Foods (incl. Nutrition Labelling and Nutrition/Health Claims, possibly Supplements)	Plus Brunei, Cambodia, Lao PDR, Myanmar and Taiwan	“Workshop and Roundtable Discussions on Food Safety and Standards”	March 4 & 5, 2014, Yangon, Myanmar
2014 (VI)	Plus Seasonings & Condiments, Milk Products, Health Foods, Alcoholic & Non-alcoholic Beverages, Food Labelling and Pesticides Residues	All the above Plus Hong Kong	“International conference on Infrastructure Needs for a Food Control System: Roadmap for Regional Harmonization”	December 9 & 10, 2014 New Delhi, India

**Regulatory Framework on Foods
and Food Additives
in India, Bangladesh, Nepal and
Sri Lanka**

February 22, 2013 Tokyo, Japan



**Workshop &
Roundtable
Discussion on
Food Safety
and Standards**

March 4-5, 2014 | Sedona Hotel, Yangon, Myanmar

Organizers: ILSI International Life Sciences Institute Japan, ILSI Southeast Asia Region

Co-organizer: Ministry of Health Myanmar

Supported by: Ministry of Agriculture, Forestry and Fisheries, Japan

Background:

India and its neighboring countries are rapidly growing with more open economies. In view of such circumstances, improvements of food safety standards and/or food safety control systems within the region are increasingly important to ensure fair food trade and to protect public health.

The Conference, therefore, aims to share information and to build capacity in the food safety control systems among the countries and further to identify needs for the future.

Objectives are to:

- 1) Share information about food safety control systems in SAARC countries and also other Asian countries
- 2) Understand Codex standards, their scientific basis and use for protecting public health and ensuring fair trade practices
- 3) Identify infrastructure needs for modern food safety control systems
- 4) Identify and discuss about possible future actions

Expected outcomes are to:

- 1) Promote harmonization in food safety standards and/or food safety control systems
- 2) Build the network among food safety authorities in the region
- 3) Identify specific issues and needs of each countries for future capacity building activities

International Conference on Infrastructure Needs For A Food Control System: Roadmap For Regional Harmonization

Food Control System in Bangladesh

Md Ruhul Amin Talukder
Research Director (Deputy secretary)
Ministry of Food

Govt. of the Peoples' Republic of Bangladesh

9-10 December 2014
Hotel Royal Plaza, New Delhi, India

Overview of Presentation

- Introduction
- Potential risks in food: food safety load
- Food Safety Institutions in Bangladesh
- Food safety laws and regulations
- Efforts by the Government
- What are required
- Conclusion

Introduction: Background.....

- Food insecurity, poverty & malnutrition situation improved significantly over the years
 - Ceres Award 1999; UNMDG Award for reducing infant mortality 2010; South-South Award 2011 for improvement in health related indicators using technology; FAO Diploma Award 2013 for reduction of undernourishment; SSCOVA 2014
- Comparable performance in social and economic indicators
- However, ~25% people are absolute poor, 16% being hardcore poor & 33% children U5 malnourished

Definition-food control:

A mandatory regulatory activity by national or local authority to provide consumer protection and ensure that all foods during production, handling, storage, processing & distribution are safe, wholesome & fit for human consumption.....
(FAO/WHO, 2003)

Introduction: Importance

- Food safety and sanitation are important determinants of food utilization and nutrition
- Food being the primary mode of transmission of infectious disease;
- Intricate linkage with development- governs individual and community health, national productivity, and promotes export potential;
- Emerged as prominent source of conflict in international agricultural trade
- Poor people tend to acquire unsafe/less quality food due to lack of purchasing power
- National Food Policy 2006 & other relevant policies & plans have given importance on food safety

Introduction: Policy linkage...

Food safety is an important part of Bangladesh National Food Policy objectives:

- Ensuring availability of **safe and nutritious** food,
- Ensuring **access to safe food** and
- **Ensuring utilization and nutrition** especially for women and children



All three objectives have emphasized on food safety

Introduction: Policy linkage

Linkage: Food safety and Vision 2021

- Poverty will be reduced to 15% by 2021
- Self-sufficiency in food by 2013*
- Nutrition needs of 85% of the population
- By 2021, a minimum daily intake of 2,122 kilo calories
- Ensure primary health care and sanitation for all
- Average longevity will be increased to 70 yrs*
- Efforts for the reduction of child and maternal mortality

Introduction: Objective (s)

To illustrate the food safety institutional framework in Bangladesh and ongoing & future actions to improve the system;



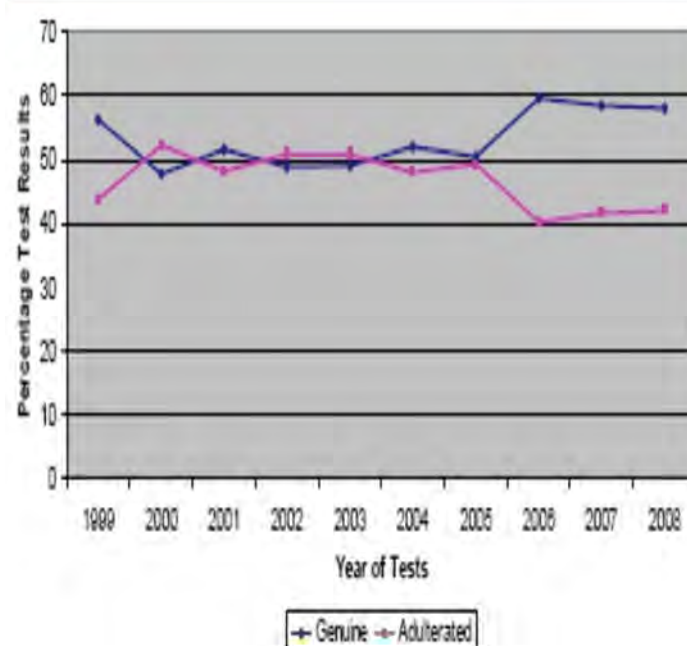
Potential risks in food: food safety loads.....

Potential risks in food

- Physical risk
- Chemical risks
- Biological risks
- Other specific risks
 - Environmental/ethical risk(s)



Results of food samples tested in IPH



Note: samples are not randomly taken, rather taken from suspicious lots; and that things have improved remarkably in recent years

Potential risks in food: food safety loads.....

Burden of foodborne illness

- Limited data available in Bangladesh.
- About 230,000 children die from diarrhoea each year in Bangladesh.
- Typically 25-30% population suffer an episode of foodborne illness/annum



↓

BANGLADESH
40 million cases/annum
(110,000 cases/day)

FAO, BFSP 2011

Food safety work loads.....

Food safety Institutions need to be designed to cater these workloads

In import-export (2012)

Item	Import (000 mt)	Export (000 mt)
Rice	250-1500	2.5
Wheat	3500	-
Maize	1000	-
Pulses	140	-
Edible oil	3000	-
Vegetables	20	10
Fruits	109	2.5
Fish	n.a	1000

In Production

Rice+wheat 35 (mmt); Maize 0.2 mmt; Vegetables 1.52 mmt; Fruit 1.49 mmt; Oil seed 0.36 mmt; Spices 0.37 mmt; Fish 3.4 mmt; Cattle & buffalos-273.72 million; goats, sheep and pigs-17.789 million; fowls & ducks-154.715 million

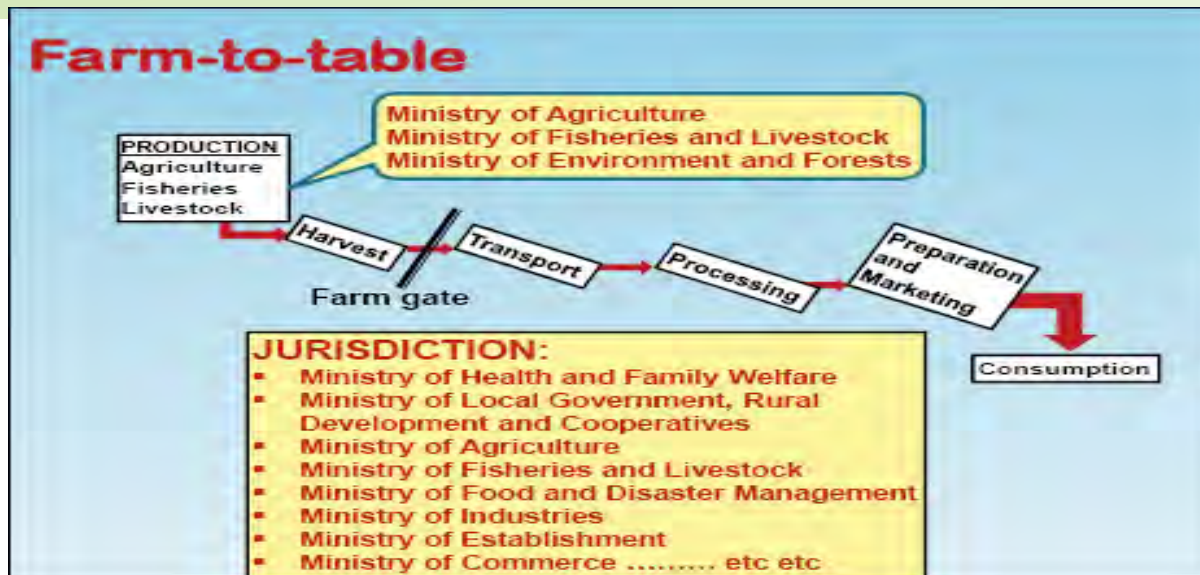
In Post harvest processing

16000 rice mills, over 650 flour mills, about 630 registered food processing industries; 193 cold storages for vegetables/fruits/fishes; 129 fish processing plants, 2300 depots and over 650 ice plants; 636 LSDs, 13 CSDs and 5 Silos

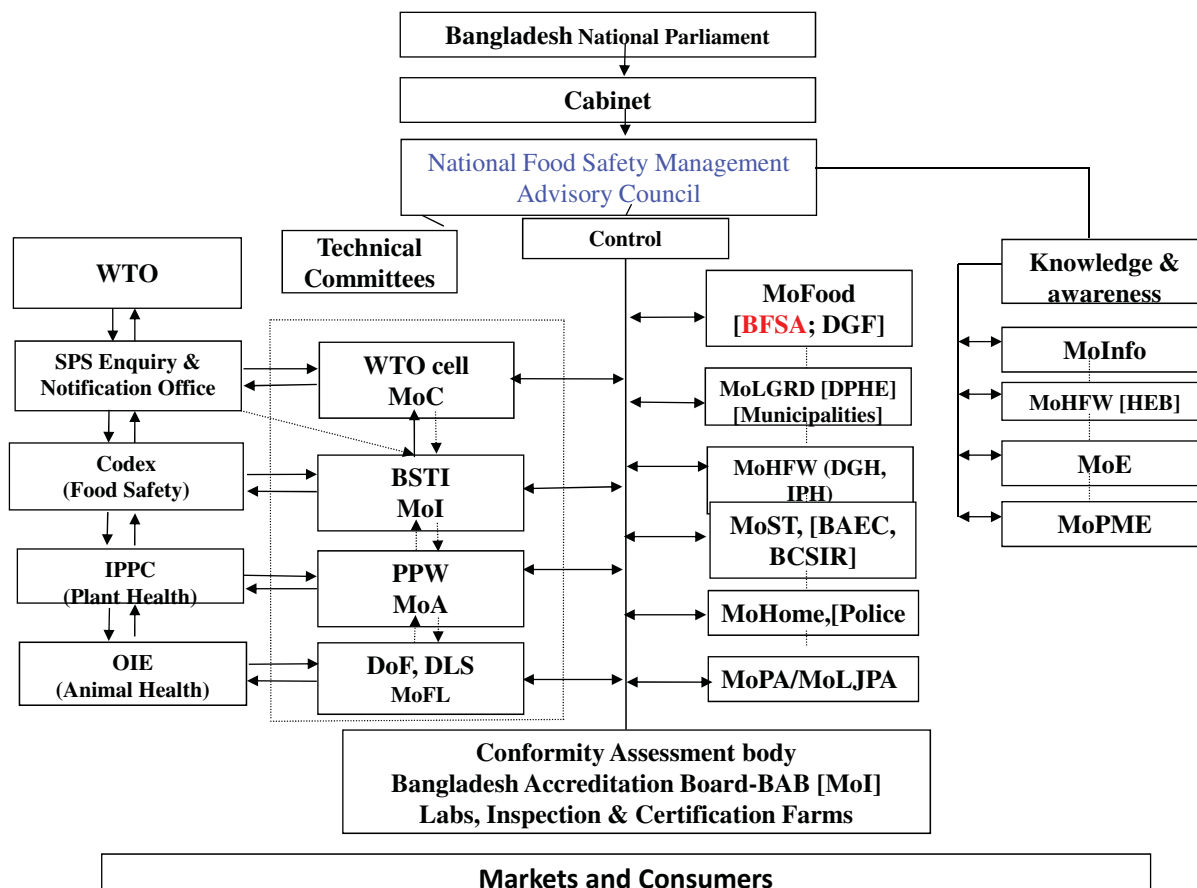
☐ Millions of farm holdings; Consumption of chemical fert. over 3.2 mmt & pesticides over 16.5 thousand mt; >30 million HHs; ~14000 markets

Food Safety Institutions in Bangladesh...

- Multisectoral responsibility: Roles defined by Rules of Business of the Government and Allocation of Business to Ministries and Divisions and Food laws/rules/import policy order



New National Food Safety Regulatory Framework



Conformity Assessment Infrastructure

Food laboratories:

Government: IPH/IEDCR (DGH); BSTI; DGF; DoF; BLRI; CDIL (DoL); DAE (PPW); IPHN (DGH); BLRI; Armed Forces Food and Drug Laboratory

Autonomous: IFST (BCSIR); BAEC; BARI (central & post harvest lab); BRRI;

Local govt.: PHL (DCC)

Public educational inst.: INFS (DU); Chem deptt. (DU); Microb. Deptt. (DU); DFTRI (BAU); DDS (BAU); Deptt. Bio-chem (BAU); Deptt Aquaculture (BAU); FRI (Mymensingh);

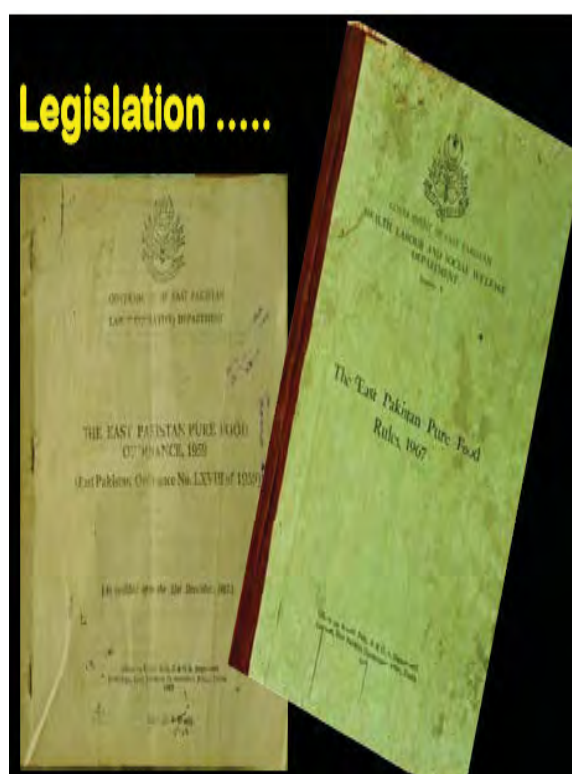
International: ICDDR'B

Lab Network

Bangladesh Accreditation Board

Laws, Ordinance and Rules.....

- Food Safety Act 2013
- Pure Food Rules 1967
- Bangladesh Standards and Testing Institution (BSTI) Ordinance (1985), amended as BSTI Act 2003
- Fish and Fish products (Inspection and Control) Ordinance 1983 (Ordinance xx of 1983)
- Fish and Fish product (Inspection and Quality Control) Rules, 1997
- Fish Protection & Conservation Act, 1950 (amended in 1995);
- Marine Fisheries Ordinance 1983 and Rules 1983.



Laws, Ordinance and Rules.....

- Fish and Animal Feed Act 2010
- The Animals Slaughter (Restriction) and Meat Control (Amendment) Ordinance – 1983; → Meat Control Act 2010
- Bangladesh Animal Disease Act, 2005
- Bangladesh Animal and Animal Product Quarantine Act, 2005
- Bangladesh Accreditation Act 2006
- Destructive Insects and Pest Rules, 1966 amended up to 1989
- The Pesticide (Amendment) Act, 2009 and the Pesticide Rules 1985 amended up to 2010
- Consumer Right Protection Act 2010
- Local Government (City Corporation) Ordinance, 2008
- The Radiation Protection Act, 1987
- Bangladesh Standard Specification for Grades on Milled Rice
- Agricultural Produce Market Act 1964 (revised in 1985)

Laws, Ordinance and Rules

- The Food Grain Supply (Prevention of Prejudicial activity) Ordinance, 1956 (Ord. xxvi of 1979)
- The Essential Commodity Act, 1990
- The Iodine Deficiency Disorders Prevention Act, 1989
- The Food or Special Courts Act 1956
- Ministry of Food Procurement Specifications
- Rice Mill Control Order 2008
- Bangladesh Plant Quarantine Act, 2011
- 107 food standards under PFR 1967 and 59 mandatory standards & also around 600 voluntary stds under BSTI
- Import Policy Order 2012-15: quality & safety of imported food
- For export, inspection & certifications are carried out according to intl stds/procedures and importing country stds and needs by respective agencies

Harmonization with Intl. Food Standards: Obligation for Bangladesh

- Signatory to WTO, AoA: SPS and TBT Agreement
- Member CAC, IPPC, OIE
- Constitution, Domestic laws and Ordinance



- ❑ 17 tech committees for food & agric sector in BSTI
- ❑ Codex std harmonized for 152 foods
- ❑ National Codex Committee (BNCC) ;14 members from across relevant Ministries and Agencies
- ❑ Capacity development of the NCCP & BNCC

Improving food safety: efforts from the Government.....

- **New Policies, Plans and Strategies:** CIP 2011; Import Policy Order 2012: Food safety policy is under way
- **Amendment of Acts, Laws and Rules:** **Food safety Act 2013;** The Consumer Protection Act 2010 and other laws formulated/amended after 2009;
- **Constructing standards;** Accomplishing standards, guidelines, procedures of the CODEX; Complementing ISO, HACCP, GMP, GHP, GAP etc.
- **Modernization of labs** under different organizations including BSTI, IFST, IPH etc.
- Food borne disease monitoring and surveillance systems
- **New projects:** Modernizing food control (MoFood 2005); Bangladesh Food Safety Project (2-phases) (MoHFW 2009 onwards); A new project launched for *Institutionalization of food safety in Bangladesh (MoFood 2014)*

Focus of the food safety policy

- ❑ A science -based approach to risk identification, analysis, management & communication
- ❑ Food chain approach
- ❑ Multi-sectoral involvement-Inter –Ministerial co-ordination
- ❑ Strengthening national technical capacity
- ❑ Preventive measures across the food chain:
- ❑ Informed policy decisions: Monitoring and Evaluation, Research & studies
- ❑ Harmonization of International Standards and Regulations
- ❑ Stakeholder/Consumer education

Improving food safety: efforts from the Government

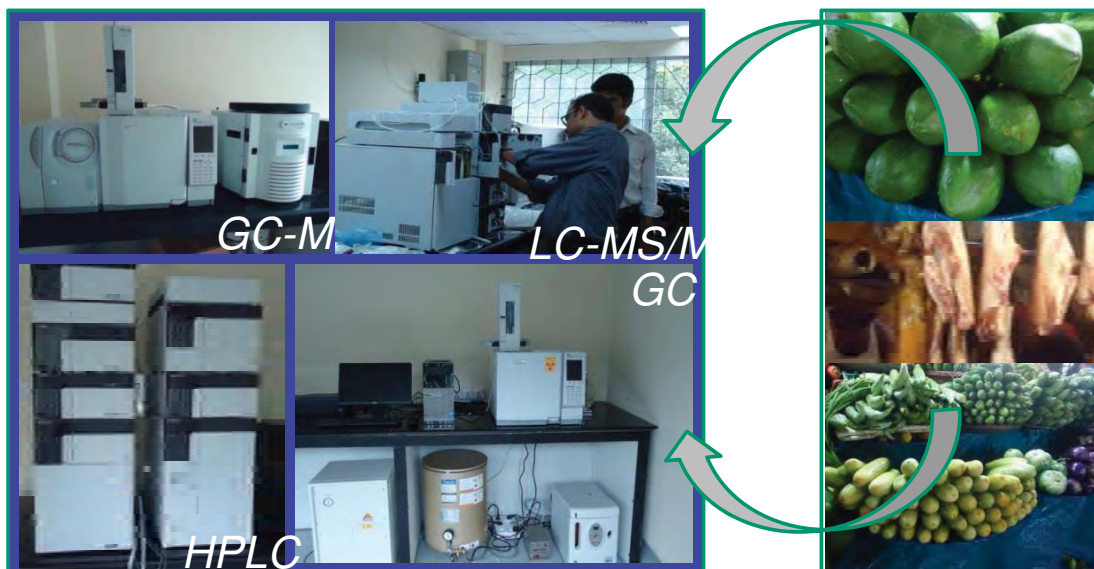
- Strengthening surveillance, information, awareness, promoting
- Activation of BAB; Accreditation of labs; setting reference lab at IPH
- **Coordination:** Formation of National Food Safety Management Advisory Council and Technical Committees; **BFSA is underway;**
- Public-Private Sector Interaction ; Network/linkage building;
- Enhanced institution for Biotechnology in Bangladesh
- Activities in regional & international arena



*Finalizing
the Food
Safety
Emergency
Response
Plan*



NFSL at IPH: Pesticide and veterinary drug residue analysis



Food Safety Act 2013

- Provisions for strengthening institutions (Art 3-19)
 - 29 member National Food Safety Management Advisory Council
 - Bangladesh Food Safety Authority: 1 Chairman; 4 members; Directors
 - Central Food Safety Management Coordination Committee-28 member
 - Technical committees (7+)
- Provisions relating to food safety system (Art 23-42)
- Provisions relating to Responsibilities of food traders, (43-44)
- Food analysis & testing (45-50), Inspection & confiscation (51-57), Offences & punishments (58-63), Food courts (64-75), Administrative enquiries/fines (78-79) etc.

Issues and Challenges...

- **Understaffing** in almost every organizations engaged in food safety activities- regulation and enforcement, inspection and testing, monitoring and evaluation etc;
- **Updating rules/standards:** Rules relating to seizure and administrative actions are notified so far
- **Coordination:** establishing & functioning of BFSA in the shortest possible time & set actionable coordination mechanism;

- Poor personal hygiene
- Contaminated food supply
- Little control of raw materials
- Important zoonotic diseases
- Lack of effective management of food supply chain



Causes of poor results in laboratory



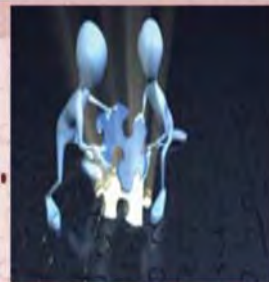
What are required...

- Functioning of the BFSA and well coordinated system
- Adequate number of trained manpower for inspection and testing in the stipulated timeframe
- Food safety data base, food borne disease data base;
- Communication strategy for each group of stakeholders
- Adoption of a science-based system in phases;
- Mobilization of financial resources; mobilize development partners assistance;
- Regional harmonization and resource sharing mechanism

Conclusions

- Govt. hopes that the ongoing efforts would embody all recent developments and help establish a science based and people centered approach;
- Considering the constraints of resources, regional harmonization of standards, procedures, etc. and resource/information sharing are important
- Private sector participation is also instrumental
- Assistance from the DPs will be helpful too.

Long term success involves all parties..



▪ **Government:**

- National food safety policy
- Legislation – standards and regulations
- Competent inspectors and enforcement officers
- National Food Safety Laboratory

▪ **Food Industry:**

- Taking responsibility for managing food safety

▪ **Consumers:**

- Informed, active in advocacy, and a voice in the decision-making processes

THANK YOU

Questions/comments?

Food Control System in Bhutan

Ms. Dechen Choki
Bhutan Agriculture & Food Regulatory Authority
Ministry of Agriculture & Forests
Royal Government of Bhutan

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Presentation Structure

- Background
- Food legislation and its harmonization with Codex
- Advocacy and Awareness
- Laboratory Services
- Challenges/Future Needs

National Food Control Agency

- The Bhutan Agriculture and Food Regulatory Authority (BAFRA), Ministry of Agriculture and Forests (MoAF) – established on 5 Aug. 2000.
- National Food Inspectorate/National Food Control Agency – 2003.
- BAFRA – NCA for bio security , focal points for CAC and IPPC and, national enquiry point for WTO-SPS Agreement.
- Food safety governed by the Food Act (2005) and the Food Rules & Regulations (2007).
- The NFQSC constituted under the Food Act.
- The NFQSC comprises of representatives from all the key ministries and agencies.

Composition of the NFQSC

1. the BAFRA
2. the Department of Agriculture (DoA)
3. the Department of Livestock (DoL)
4. the Department of Public Health (DoPH), Ministry of Health
5. the Department of Trade (DoT), Ministry of Economic Affairs
6. Bureau of Law & Order, Ministry of Home & Cultural Affairs
7. Office of the Attorney General
8. the Bhutan Chamber of Commerce & Industries
9. the National Environment Commission

Chair - the Minister for Agriculture and Forests.

Member Secretary – the head of BAFRA.

Food Legislation and its Harmonization with Codex

- The Food Rules and Regulations, 2007 cross refers to the relevant Codex standards, guidelines and codes of practices.
- National food standards, guidelines and codes of practices is developed based on the existing Codex works.
- The Mechanism for National Food Standards Development has been formalized.

26. Requirement for licensing

A food business that complies with Section IV of the latest revision of the Recommended International Code of Practice – General Principles of Food Hygiene (at present CAC/RCP 1-1969) of the Codex Alimentarius and where applicable with the requirements of a commodity specific Codex Recommended Code of Technological and/or Hygienic Practice shall be eligible for a food business license.

Preventive approaches to food safety

- Good husbandry practices
- Farm bio security practices
- GAP
- GHP/GMP
- HACCP
- ISO 22000

Bhutan – a net importer

- Risk based food import inspection is crucial.
- Drafted the Good Import Practices (GIP) criteria and Food Importation into Bhutan : Permitting, Admissibility and Inspection Processes.
- MoU signed with EIC, India with the following aims;
 - Ensure food exports from India to Bhutan are safe and wholesome.
 - Reduce duplication of inspection of products notified by BAFRA.

Advocacy and Awareness – an on-going activity.

- Food handlers' training mandated by the Food Rules and Regulations.
- Since 2008, a total of 10,370 food handlers were trained and licensed.
- 2008 – General Food Handlers' Training Manual developed.
- Dec. 2013 – Specific categories of food handlers' training manuals developed for street food vendors, meat handlers and those working in food processing units.
- Dec. 2014 – Specific categories of available training manuals being developed into training modules.
- Street theatre, panel discussions, exhibitions.

30. Prerequisite for a license

30.1 A person is eligible for license as a FBO if he/she is in possession of minimum qualifications in food safety and has a satisfactory knowledge of the Food Act & its R&R.

30.2 A person shall be deemed to possess the minimum qualification in food safety if he/she is in possession of a license as food handler and has successfully passed a course of the Food Act approved by BAFRA.

Laboratory Services

- National Food Testing Laboratory (NFTL) established in Dec. 2005.
- NFTL accredited to ISO/IEC 17025 in Nov. 2012.
- Scope of accreditation includes 5 major categories of food products.
- Currently accredited for 14 test parameters (11 chemical+3 microbiological).
- Satellite laboratories and decontamination facilities established at the 5 major entry points.

Challenges/Future Needs

- Extend the scope of accreditation of the NFTL.
- Adequate training of lab analysts in a well recognized regional laboratory.
- Keep abreast of the latest technology equipment, updated standard references and accordingly train staffs.
- Laboratory networking for effective resource pooling in the region.
- Establishment of four regional satellite food laboratories.
- Strengthen satellite laboratories at the five major entry points.
- Strengthen the understanding of risk analysis principles.

- Develop national food safety information system.
- Strengthen capacity to contribute to the standards setting process with enhanced regional collaboration and cooperation.
- Capacity building for conducting risk assessment.
- Establishment of a food borne disease surveillance system.
- Capacity building on investigation of food diseases outbreaks epidemiologically and clinically.

THANK YOU !!!



भारतीय खाद्य संरक्षा एवं मानक प्राधिकरण
Food Safety and Standards
Authority of India

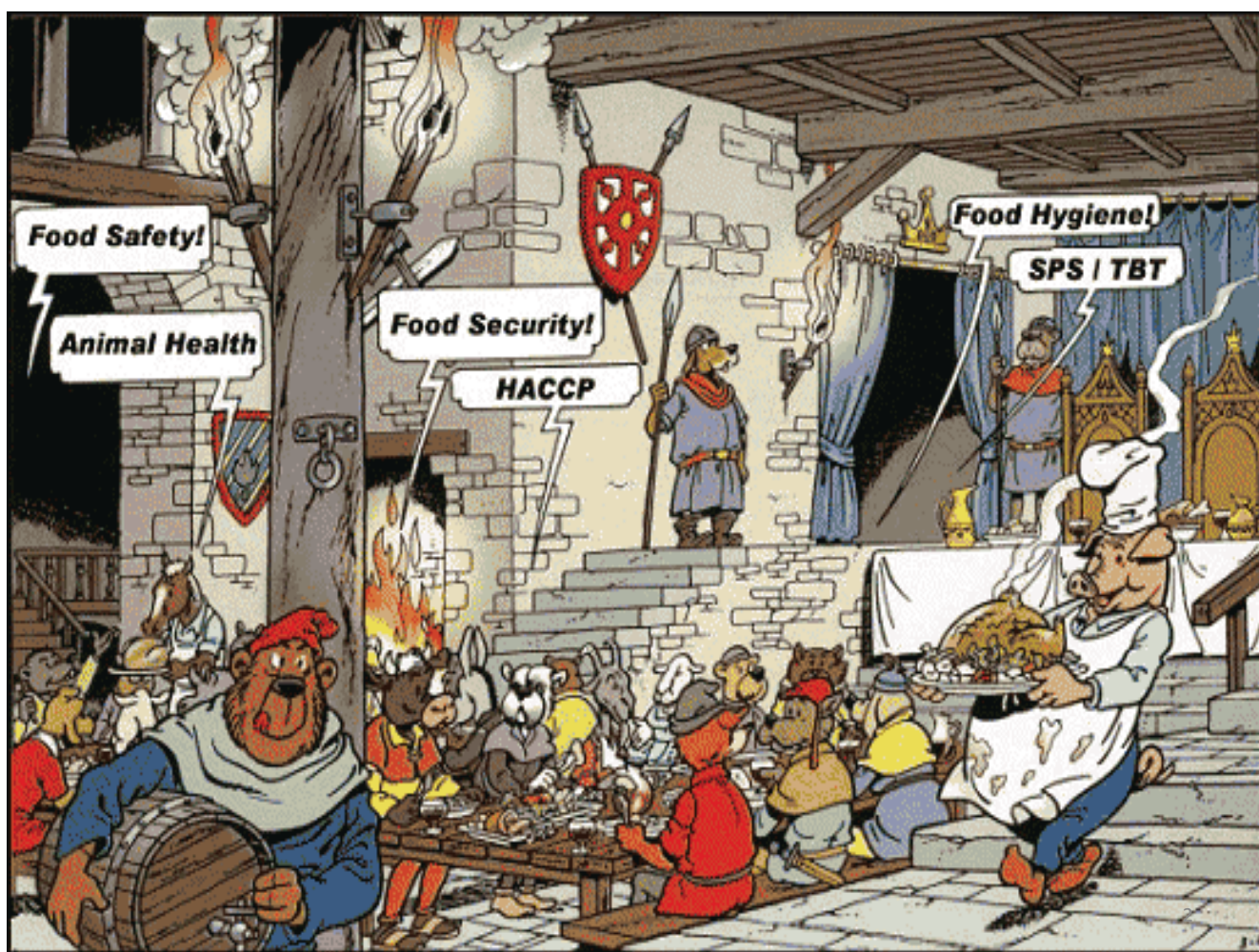
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Food Safety in India : A Regulatory overview

Ms Vinod Kotwal
Director (Codex)
FSSAI

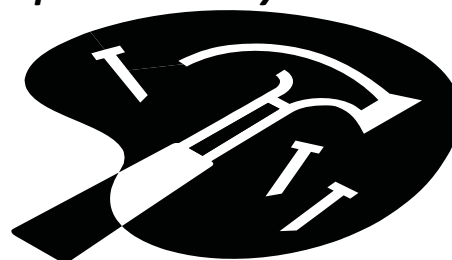
9th December 2014
New Delhi

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Food Control

--- a mandatory regulatory activity of enforcement by national or local authorities to provide consumer protection and ensure that all food during production, handling, storage, processing, and distribution are **safe, wholesome and fit for human consumption; conform to safety and quality requirements; and are honestly and accurately labelled as prescribed by law.**



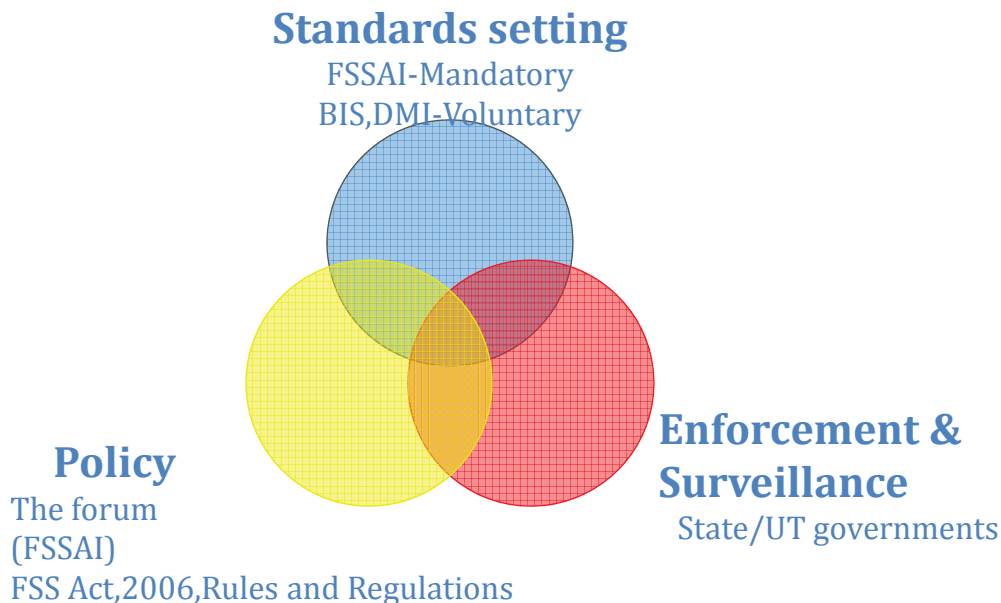
3



- The challenge for food regulators is to maintain a food regulatory system that delivers **safe food** for the population, enables consumers to make **informed choices** and also maintains public confidence in the food regulations.
- Public confidence in the food regulations will depend, firstly, on evidence that there is a low level of risk and, secondly, on assurance that adequate systems are in place to monitor and analyse food, and to respond when situations of potential harm occur.
- Providing evidence (**risk assessment**) that there is a low level of risk requires a method of analysing food risks that is evidence-based and transparent, and results in effective management strategies (**risk management**) which can be communicated clearly to consumers (**risk communication**).

4

India's food regulatory system *fssai*



How it integrates?



Objective

The Food Safety and Standards Authority of India (FSSAI) has been created for laying down science based standards for articles of food and to regulate their manufacture, storage, distribution, sale and import to ensure availability of safe and wholesome food for human consumption.



7

FSS ACT 2006

- The Act consists of 12 chapters:
 1. Preliminary: definitions
 2. Food Safety and Standards Authority of India
 3. General principles of food safety
 4. General provisions as to food: prohibitions
 5. Provisions relating to import
 6. Special responsibilities as to food safety
 7. Enforcement of the act
 8. Analysis of food: laboratories, sampling and public analysts
 9. Offences and penalties
 10. Adjudication and food safety appellate tribunal
 11. Finance, accounts , audits and reports
 12. Miscellaneous

8



What is covered under the FSS Act, 2006?



FOOD means any substance, whether processed, partially processed or unprocessed, which is intended for human consumption and includes primary food, genetically modified or engineered **food** or food

containing such **ingredients**, infant food, packaged drinking water, alcoholic drink, chewing gum, and any substance, including water used into the food during its manufacture, preparation or treatment but does not include any animal feed, live animals unless they are prepared or processed for placing on the market for human consumption, plants prior to harvesting.



Any food handled in-between



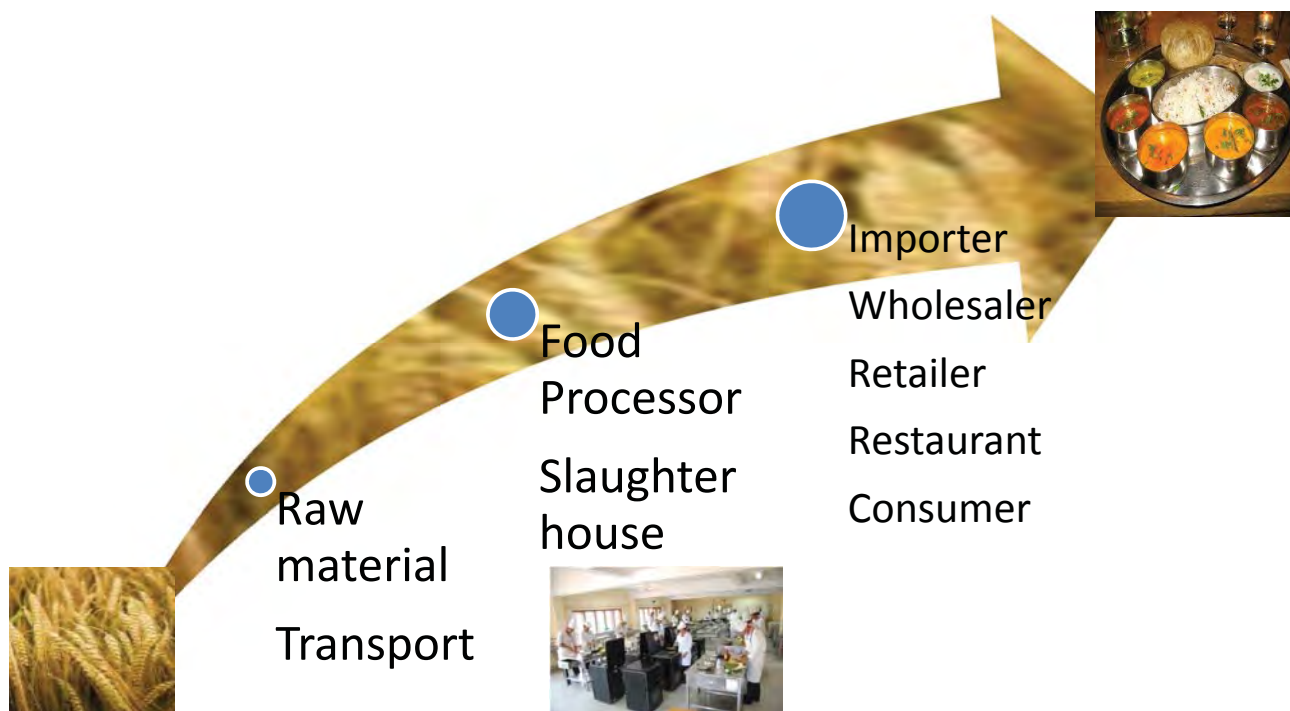
Who comes under the purview of the Act?

Every Food Business Operator



Safety across the Food Chain: Focus

FSS Act, 2006



11

Section 25 - Imports

- No person can import
 - Any unsafe or misbranded or sub-standard food or food containing extraneous matter
 - Any article of food for the import of which a licence is required
 - Any article of food in contravention of any other provision of this Act
- The Central Government shall, while prohibiting, restricting or otherwise regulating import of articles of food under the Foreign Trade (Development and Regulation) Act, 1992, follow the standards laid down by the Food Authority

12



Food Safety and Standards Regulations under FSS Act

- Section 92 (1)- provides Food Authority with the previous approval of Central Government and after previous publication, by notification, make regulations consistent with this Act and Rules made there under.
- FSSAI drafted Regulations through extensive consultation and deliberations/meetings with various stakeholders.
- Rules and 6 Regulations have been notified in the gazette of India on 1st August, 2011 and came into force on 5th August, 2011
- There is an urgent need to simplify the process of notification so that more standards and Regulations can be notified quickly

13



Contd.....

- 1) Food Safety and standards (Licensing and registration)Regulations, 2011
- 2) Food Safety and standards (packaging and labeling)Regulations, 2011
- 3) Food Safety and standards (Food products standards and Food Additives) Regulations, 2011.
- 4) Food Safety and standards (Prohibition and restriction for sale) Regulations, 2011
- 5) Food Safety and standards (contaminants, toxins and Residues)Regulations, 2011.
- 6) Food Safety and standards (Referral laboratories and sampling) Regulations, 2011


14




Regulatory Mechanism




Food Authority and the State Food Safety Authority



Central Advisory Committee
Close cooperation and coordination between Centre, States and other Stakeholders in the field of food including consumer org.



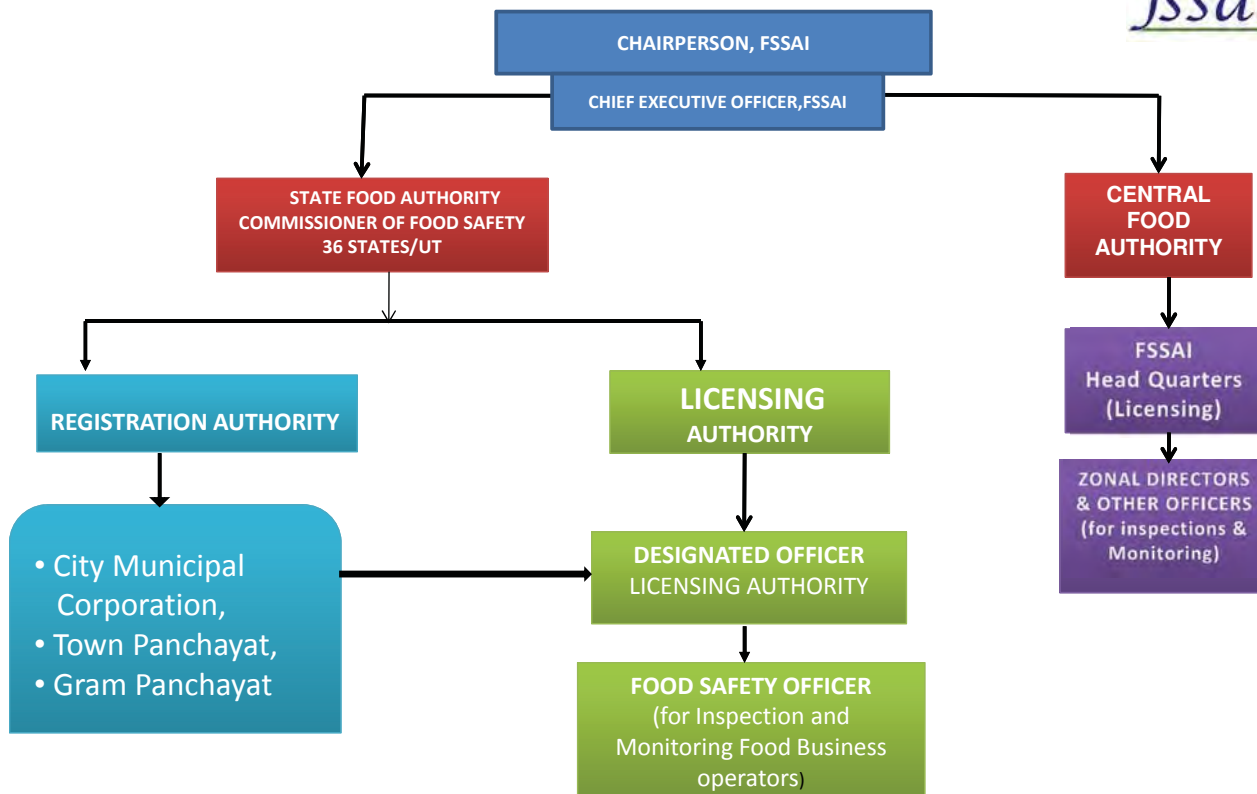
Scientific Committee
Consists of heads of scientific panels & 6 scientific experts. They will provide the scientific opinion on multi sectoral, cross-cutting issues



Scientific Panels
Nine panels on Food Additives, Pesticide Residues, GM Food, Biological Hazard, Labeling, Functional Food, Method of Sampling, Contaminants and Fish & Fisheries.

15

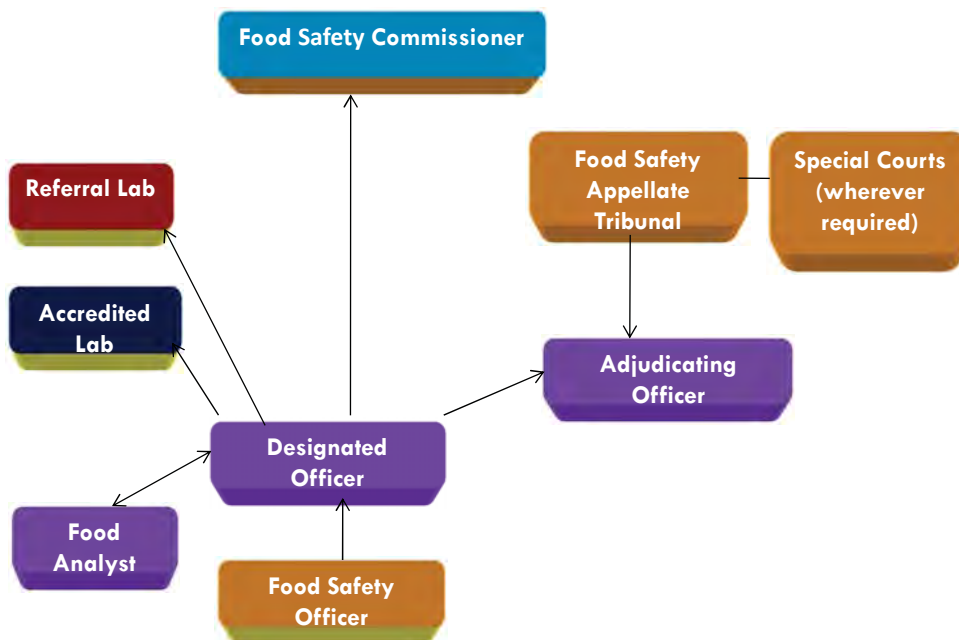
Framework for National Food Control System



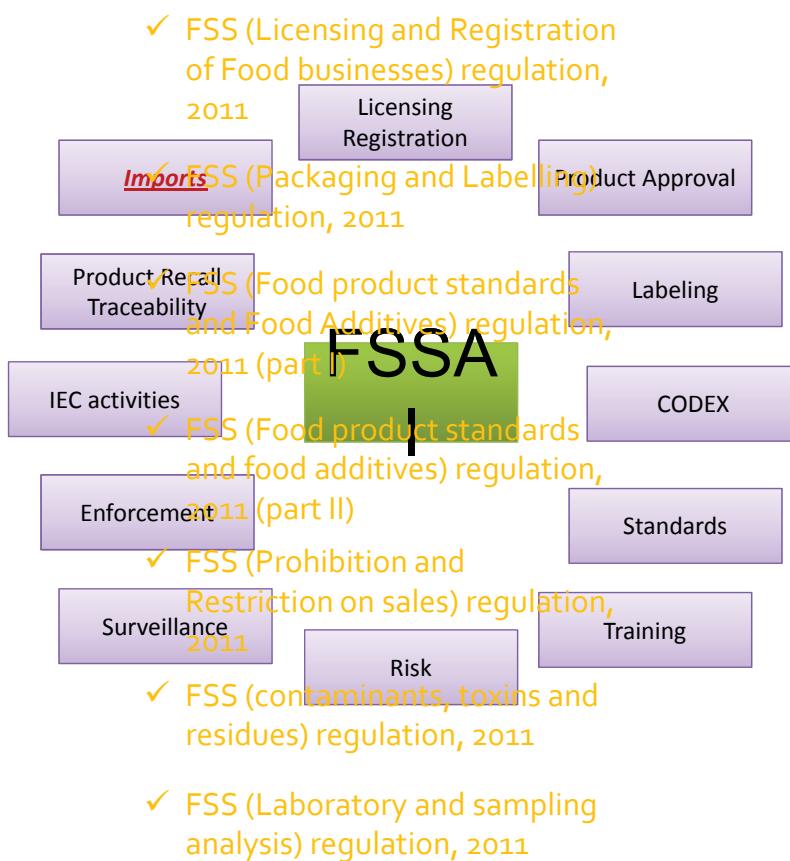
16



Major Functionaries in the State



FSS Act & Regulations, 2011



FSSAI
Imports
Licensing Registration
Product Approval
Labeling
CODEX
Standards
Training
Risk
Surveillance
Enforcement
Programs
Product Recall Traceability

Standards



Criteria – Section 13(1) and 14 (1) specifies that Food Authority shall establish Scientific Panels, which shall consist of independent scientific experts and constitute Scientific Committee which shall consist of the Chairpersons of the Scientific Panels and six independent Scientific Experts not belonging to any Panels

Scientific Panels –

Scientific Committees –

- | | |
|--|--|
| <ul style="list-style-type: none"> ✓ (I) Panel for Functional Foods, Nutraceuticals ✓ (II) Panel for Method of Sampling and Analysis ✓ (III) Panel for Food Additives ✓ (IV) Panel for Contaminants in the Food Chain ✓ (V) Panel for Biological Hazards ✓ (VI) Panel for Pesticides and Antibiotic Residues ✓ (VII) Panel for Labelling and Claims/Advertisements ✓ (VIII) Panel for Genetically Modified Organisms and Foods ✓ (IX) Panel for Fish and Fisheries Products | <ul style="list-style-type: none"> ✓ Chairs of the Panels ✓ Six Independent scientific experts |
|--|--|

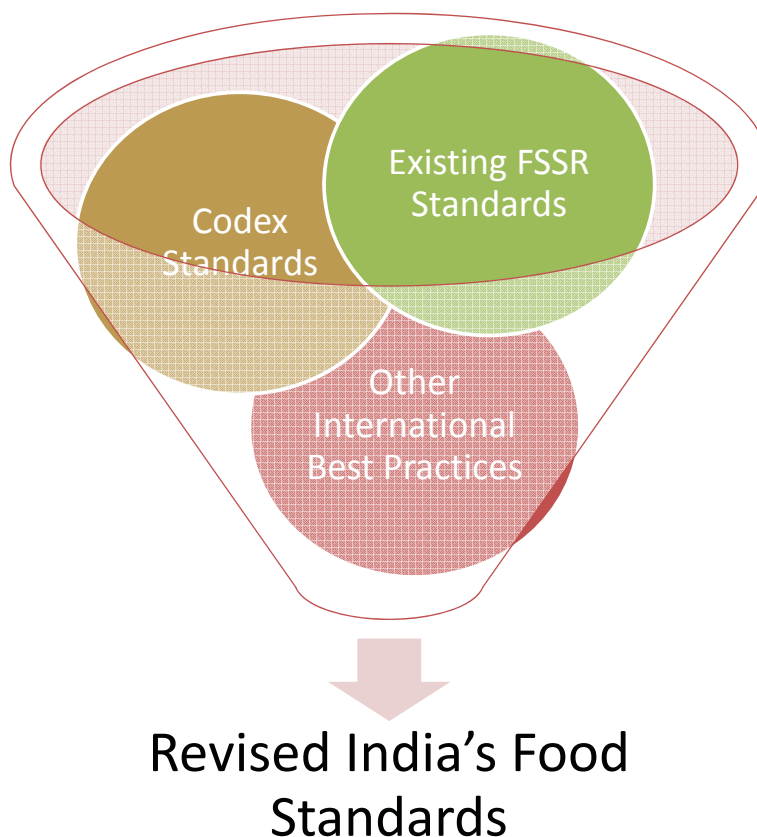
19

Harmonization of Food Standards



- Urgent need to notify more Standards under the Act
- Focus on developing Science based Standards for all Food Products
- Review Existing Food Standards and harmonize with Codex/international standards
- FSSAI is in the process of harmonizing the FSS Standards with the Codex Standards to consider the latest development in food science across the globe, food consumption pattern, new specifications, presence of new contaminants and toxins as well as use of new food additives and ingredients required by the producers and manufacturers in food business

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FSSAI-National Codex Contact Point (NCCP)

- Codex Alimentarius –Joint FAO-WHO Food Standard Programme set up in 1963
- India is a member since 1964
- FSSAI made the NCCP in 2010-11
- For each Codex Committee, a parallel Shadow Committee has been set-up that works for that particular Codex Committee
- Stakeholders for each Shadow committee are representatives from different ministries, educational institutions, from Industry Associations like CII and FICCI and experts/scientists from concerned areas
- Effective participation of India in various Codex Committees
- Proactive approach led to the creation of CCSC to be hosted by India
- Proposing new works in various Committees

22

E-Governance Initiatives



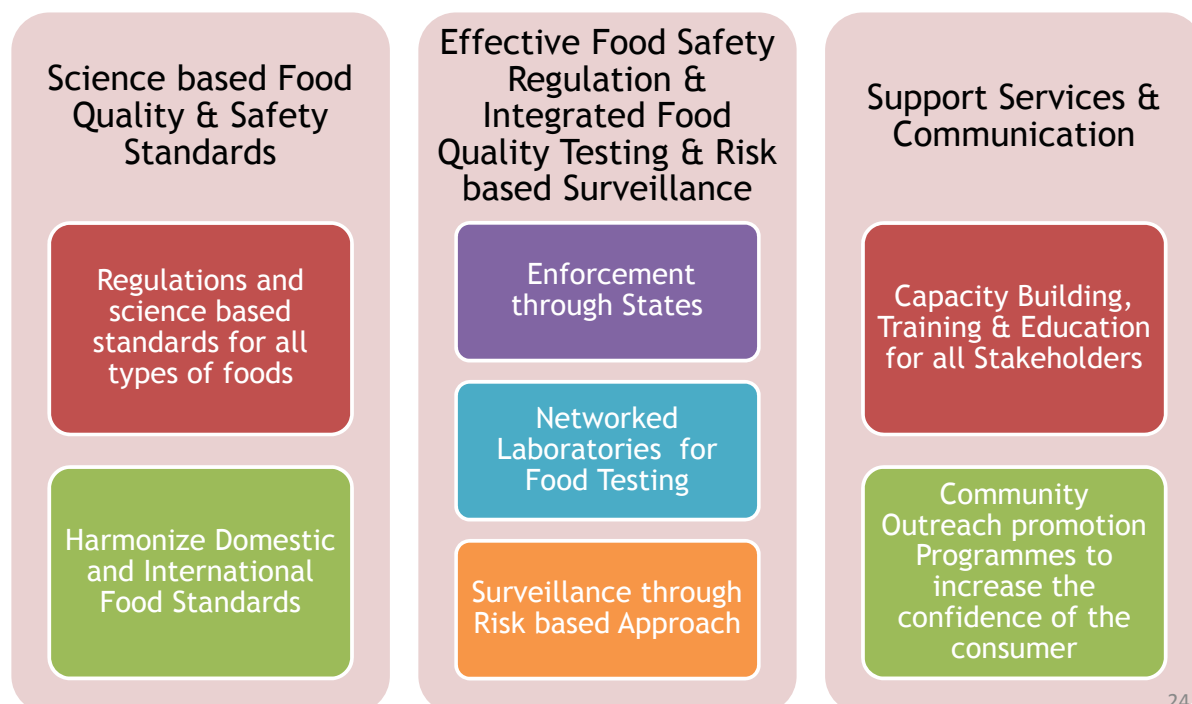
Adopting E-Governance initiatives the only way to manage the responsibility entrusted under the Act by ensuring transparency, accountability and reducing human interface

- Food licensing and registration system (FLRS)
- Food Import Clearance System (FICS)
- Food Product Approval System (FPAS)
- On-line Payment gateway system-made effective from 1st April 2014
- Food risk inspection prioritization system (FRIPS)-on the anvil

23

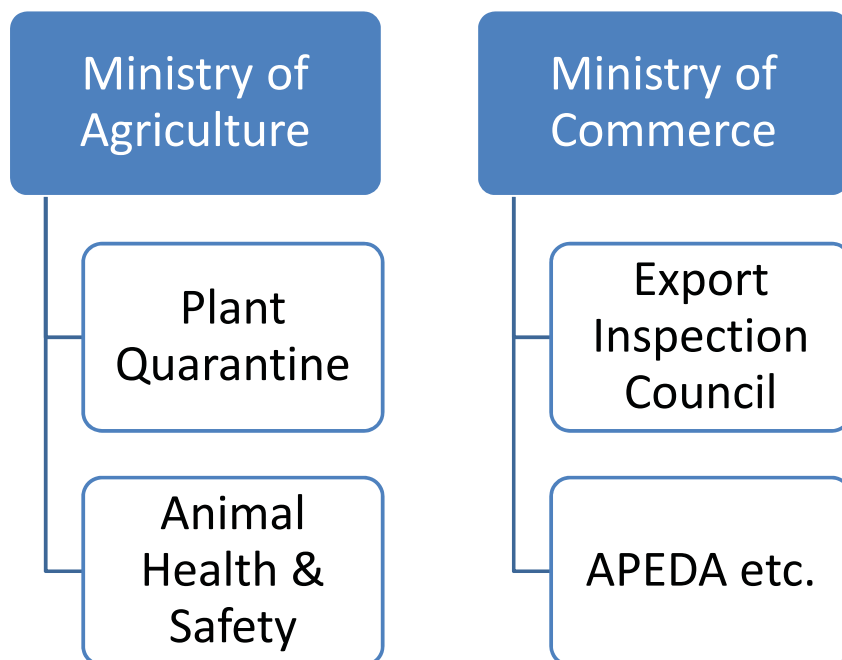


Building blocks

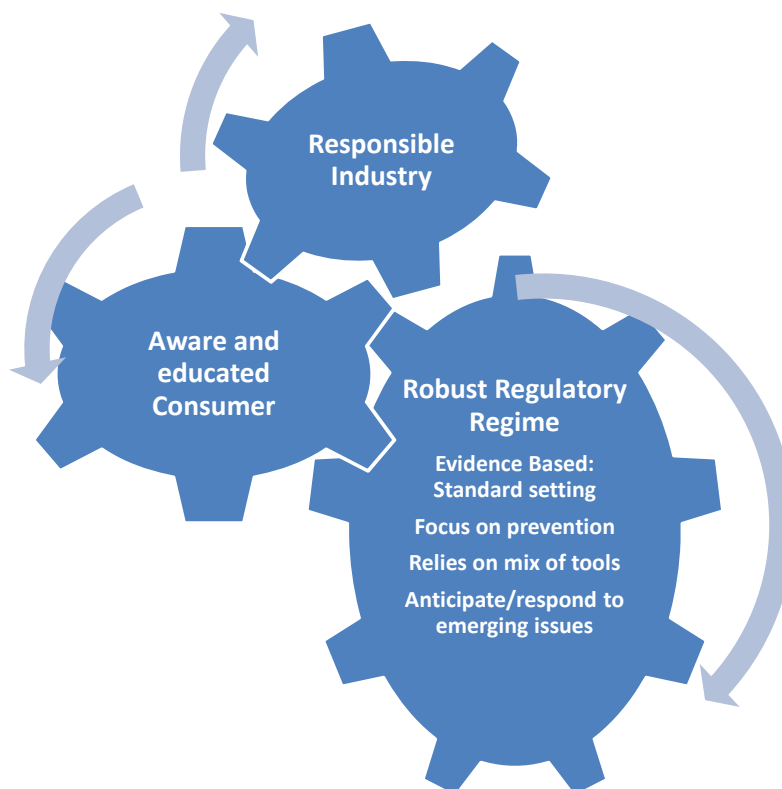


24

Other Government Agencies involved Food Control System



Food Safety: A shared responsibility



Food Safety : A shared responsibility



- **Responsible industry:**
 - ✓ Culture of food safety
 - ✓ Integrated controls: farm to fork
 - ✓ Regulatory compliance
 - ✓ Commitment to continued learning and
 - ✓ Proactive behaviour in responding to emerging food safety hazards

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Food Safety : A shared responsibility



- **Aware and educated consumer:**
 - ✓ Aware of risks and benefits,
 - ✓ Active on advice to select and handle foods
 - ✓ Adapt her/his food choices and her/his Diet to his/her health status

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Food Safety : A shared responsibility

- **Robust Food Regulatory Regime:**
 - ✓ **Evidence-based** : Standard setting and compliance and enforcement
 - ✓ Focus on **Prevention** while enabling effective reaction
 - ✓ Relies on a mix of **Tools** : regulatory and non regulatory
 - ✓ Commitment to continued **Évolutions** to accompany innovation and anticipate / respond to emerging issues

29

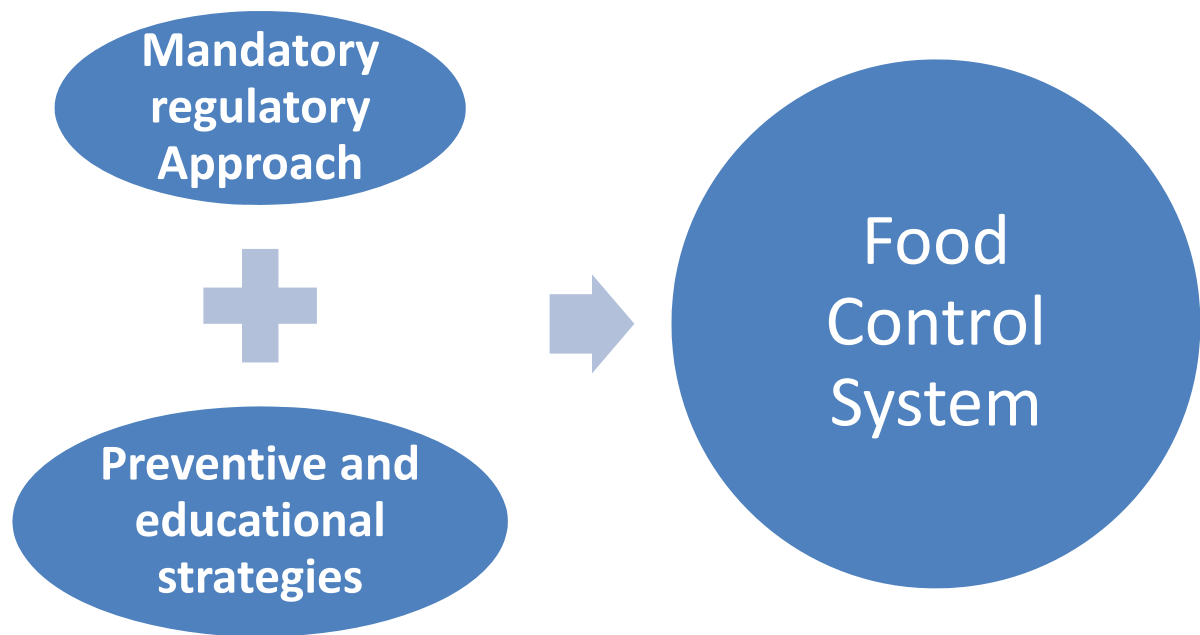
Food Safety : A shared responsibility



- **Aware and educated consumer:**
 - ✓ **Aware** of risks and benefits,
 - ✓ **Active on advice** to select and handle foods
 - ✓ **Adapt her/his food choices** and her/his **Diet** to his/her health status

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To conclude...



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Thank You

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NATIONAL FOOD CONTROL SYSTEM IN THE MALDIVES

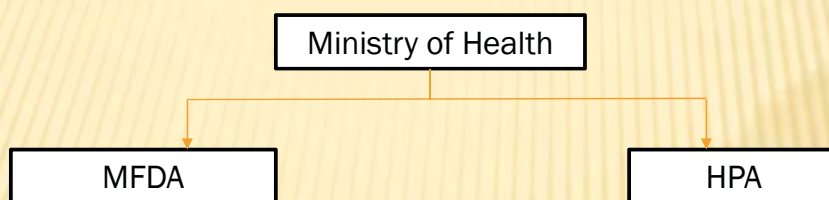
Satheesh Moosa

Food Control Division

Maldives Food & Drug Authority

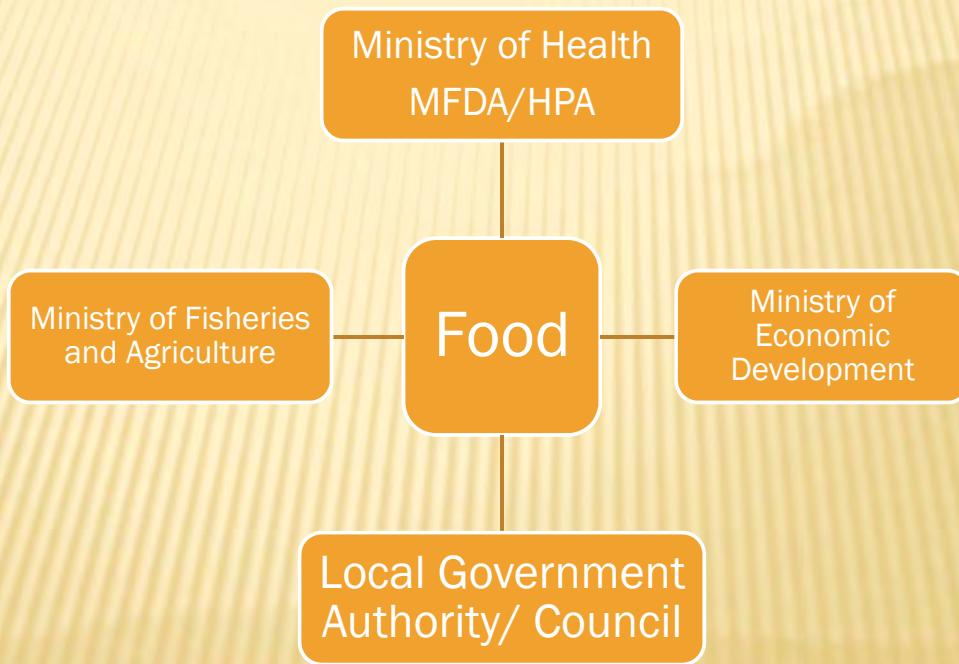
Ministry of Health

INTRODUCTION

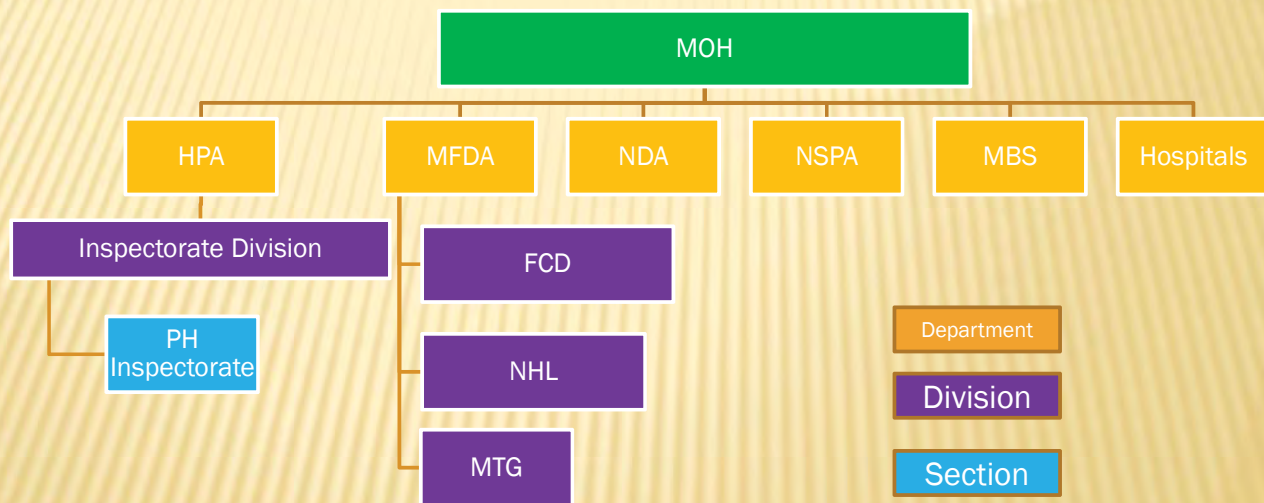


- ✘ Maldives Food and Drug Authority (MFDA) is the Competent Authority for Food.
- ✘ However, a major role is played by the Health Protection Agency (HPA). Regulates food imports and local productions. Prepackaged foods, Hygiene of Café's and Restaurants. Street Foods yet to be covered. Public Health Act gives way for HPA to regulate these activities.

OVER VIEW OF THE RESPONSIBLE AGENCIES



MINISTRY OF HEALTH



CURRENT SITUATION

- ❖ The draft Food bill is currently being aligned with the Public Health Act.
- ❖ And some of the other food standards and regulations have been drafted and awaiting approval. In the meanwhile we are adapting some of the CODEX standards as national standards.
- ❖ at present food hygiene of food establishments and imported food is regulated through Public Health Act and Food establishment regulation.
- ❖ However, current agricultural policies highlight food security and there are few regulations related to food safety and hygiene, and the Fisheries Law of Maldives controls fishin.

IMPLEMENTATION OF LAWS AND REGULATION

Regulations in force:

- ✘ Food establishment Regulation 2007
- ✘ Food Advertisement Regulation
- Port Health Regulation
- BMS Regulation
- National Standard for labelling
- Food bill: Drafted in 2007 -2009. Submitted to Attorney General office in June 2014.

ENSURING SAFE FOOD AT HOME, MARKETS AND STREETS

- ✘ Regulated by a regulation known as Food Establishment Regulation.
- ✘ The one single regulation itself is not enough to regulate.
- ✘ A product registration system for the local produces were established in 2011.
 - There are hiccups in the process due to geographical distribution and lack of technical capacity.
- ✘ Street food problem is not significant. – This is being very low in the country.
- ✘ Imported products are being regulated at Border.

ADVOCACY AND AWARENESS

- ✘ There is no proper mechanism hence being done in an *ad hoc* manner
- ✘ There is a school health promotion in Ministry of Education. Where they conduct food safety awareness for school canteens.
- ✘ Awareness programs and Food Safety materials has been distributed among schools, hotels, café and Restaurants.

LABORATORY SERVICES AND RESPONSE

- ✘ A food laboratory Known as National Health Laboratory exists. It is accredited to ISO 17025.
- ✘ Most of Microbiological testing can be done.
- ✘ Chemical testing still needs to strengthened especially for pesticide residues, Veterinary medicines, contaminants...etc
- ✘ During food safety events MFDA and HPA coordinates and collaborates

EXPORT – QUALITY ASSURANCE

- ✘ Main market is EU, MFDA is the competent authority for EU
- ✘ All factories are HACCP certified, majority ISO 22000, BRC certified.
- ✘ Audited every 6 months. All necessary laboratory analysis are performed
- ✘ Competent staff
- ✘ Health certificates issued at the airport

CHALLENGES

- ❖ There is no proper system in place for food safety and security. Also the geological distribution of islands make implementation and communication difficult as there is no effective system for monitoring and regulating the food safety concerns through the country.
- ❖ Existing regulations for food safety and quality are very weak in the light of the current constitution and have many loopholes, thus making enforcement ineffective. (absence of Food Law)

CHALLENGES

- ❖ Lack of trained staff is one of the other difficulties in implementing food safety
- ❖ Need better infrastructure at ports especially for chilled and frozen products.

Thank you!

Q & A ?



FOOD CONTROL SYSTEM IN NEPAL



Rita Pandey

Officiating Director General

Department of Food Technology and Quality Control

Ministry of Agricultural Development

Government of Nepal

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1

Nepal: In Brief



- Nepal is a landlocked country situated between 26°22' and 30°27' N latitudes and 80°40' and 88°12' E longitudes.
- It is expanded in 147,181 square kilometer area covering diversified topographical and physiographical regions of altitudinal differences.
- Administratively, Nepal is divided into 5 developmental regions, 14 zones and 75 districts with major three parallel ecological belts.
- It has diverse agricultural potential, ranging from temperate to tropical climatic conditions within a span of around 250 kilometers distance from north to south and about 800 kilometers distance in east west direction.

Source: Agriculture Atlas of Nepal, 2012

Nepal: In Brief



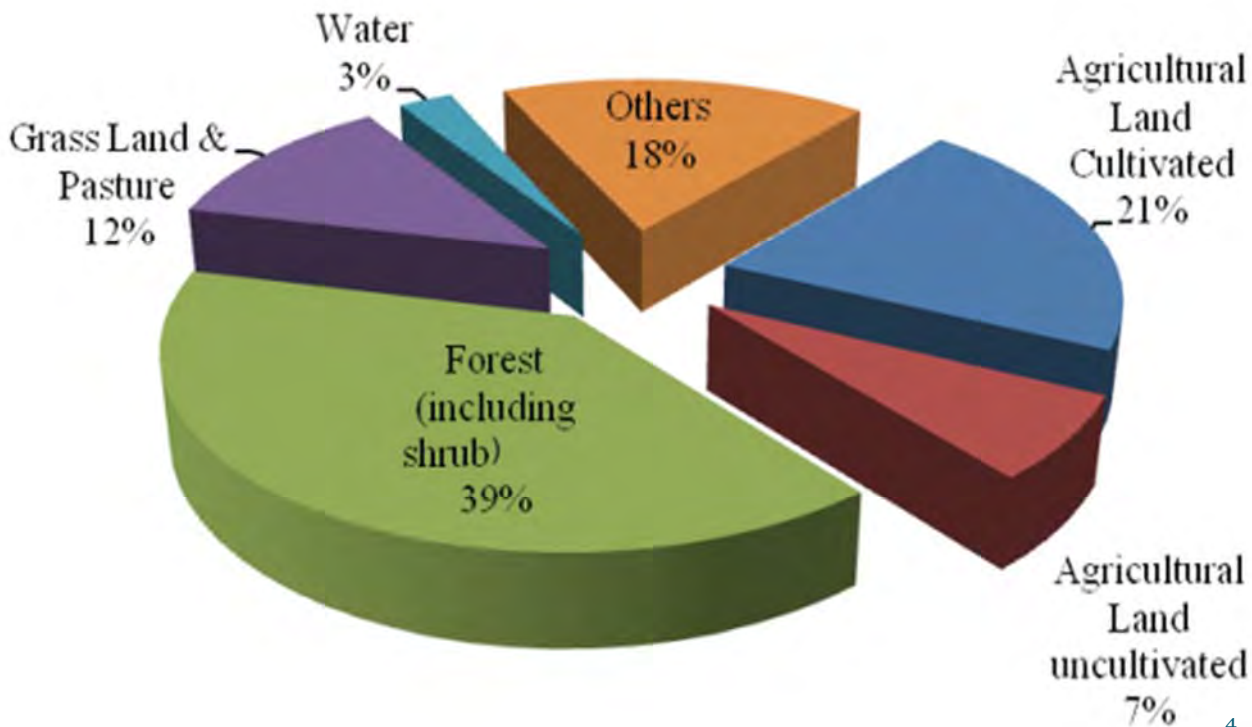
Agro ecological zones of Nepal



Nepal: In Brief



Distribution of Land in Nepal



Nepal: In Brief



Mt. Everest



Lumbini



Phewa Lake



Bhaktapur-Durbar
Square

5

Highlights

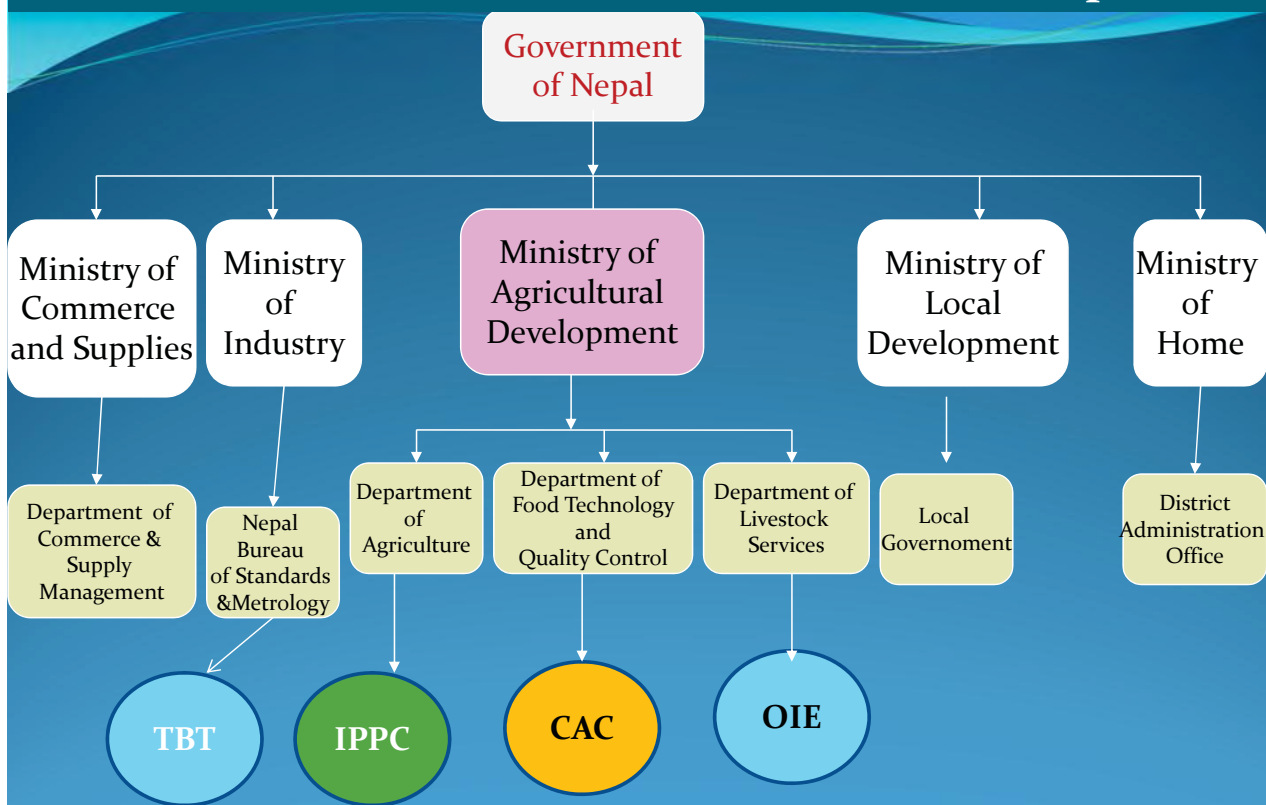
1. Food safety concept & national framework related to food control system
2. Legislation & implementation institutions for food safety
3. Department of Food Technology & Quality Control (DFTQC) & its network
4. National Food Safety and Quality Control System & DFTQC activities
5. Issues and Challenges
6. Future perspectives

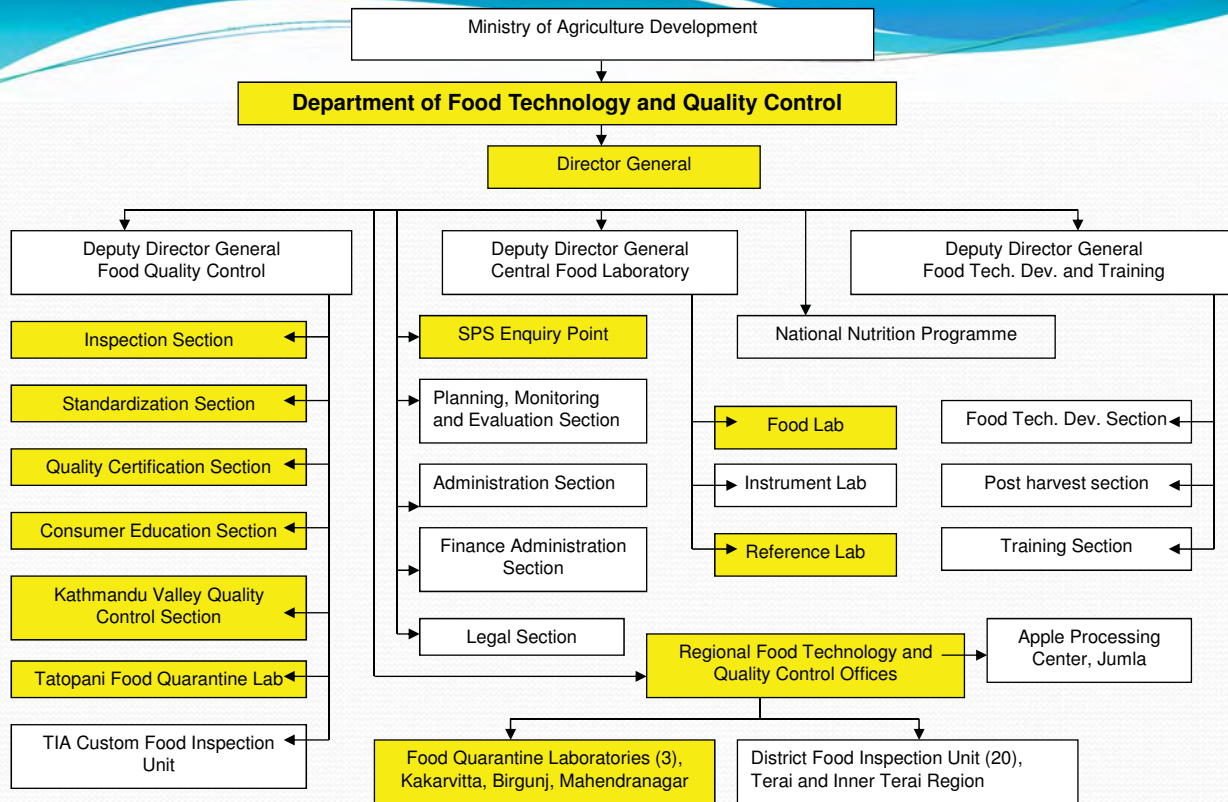
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Highlights

1. Food safety concept & national framework related to food control system

Institutions involved in Food Control in Nepal





Existing Structural Network of DFTQC

DFTQC organization network

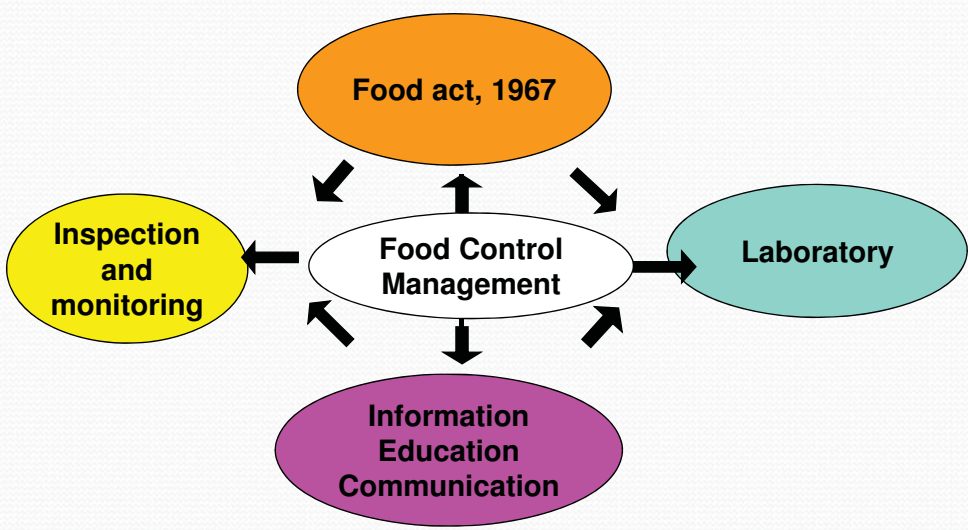


- * = Department of Food Technology and Quality Control (1)
- * = Regional Office (Food Technology and Quality Control) (5)
- * = District Level Office (1)
- * = District Food Inspection Unit (20)
- Check Post Unit
- 1. Food Quarantine Laboratory (4)
- 2. Food Inspection Unit (International Airport)

Highlights

- 2. Legislation & implementation institutions for food safety

National Food Safety & Quality Control System



Food act, 1967

- **Preamble:**

Whereas, it is expedient to make legal provisions to maintain proper standard of foodstuffs and to prevent any undesirable adulteration in foodstuffs or prevent from reducing in, or extracting, any natural quality or utility from foodstuffs in order to maintain health and convenience of the general public.

13

Food act-1967

- Definition of food, adulterated food and substandard food.
- Prohibition on production, sale or distribution of adulterated foodstuff or sub-standard food stuffs.
- Prohibition on sale of foodstuff by lying or misleading
- Powers to withhold Foodstuffs
- Provision of License

14

Food act-1967

- Penal provision
- Promulgation and setting of food standards
- Provision of food sample testing
- Adjudicating authority: The Chief District Officer
- Provision of appeal
- Powers to frame Rules

15

Food rule, 1970

- Section 13 of the Food Act, 1967
- Role responsibility and authority of DFTQC
- Provision of Public analyst
- Provision of food inspector
- Provision of analysis of food
- Provision of filing of case
- Provision of food labeling
- Mandatory standard of 113 food products.

16

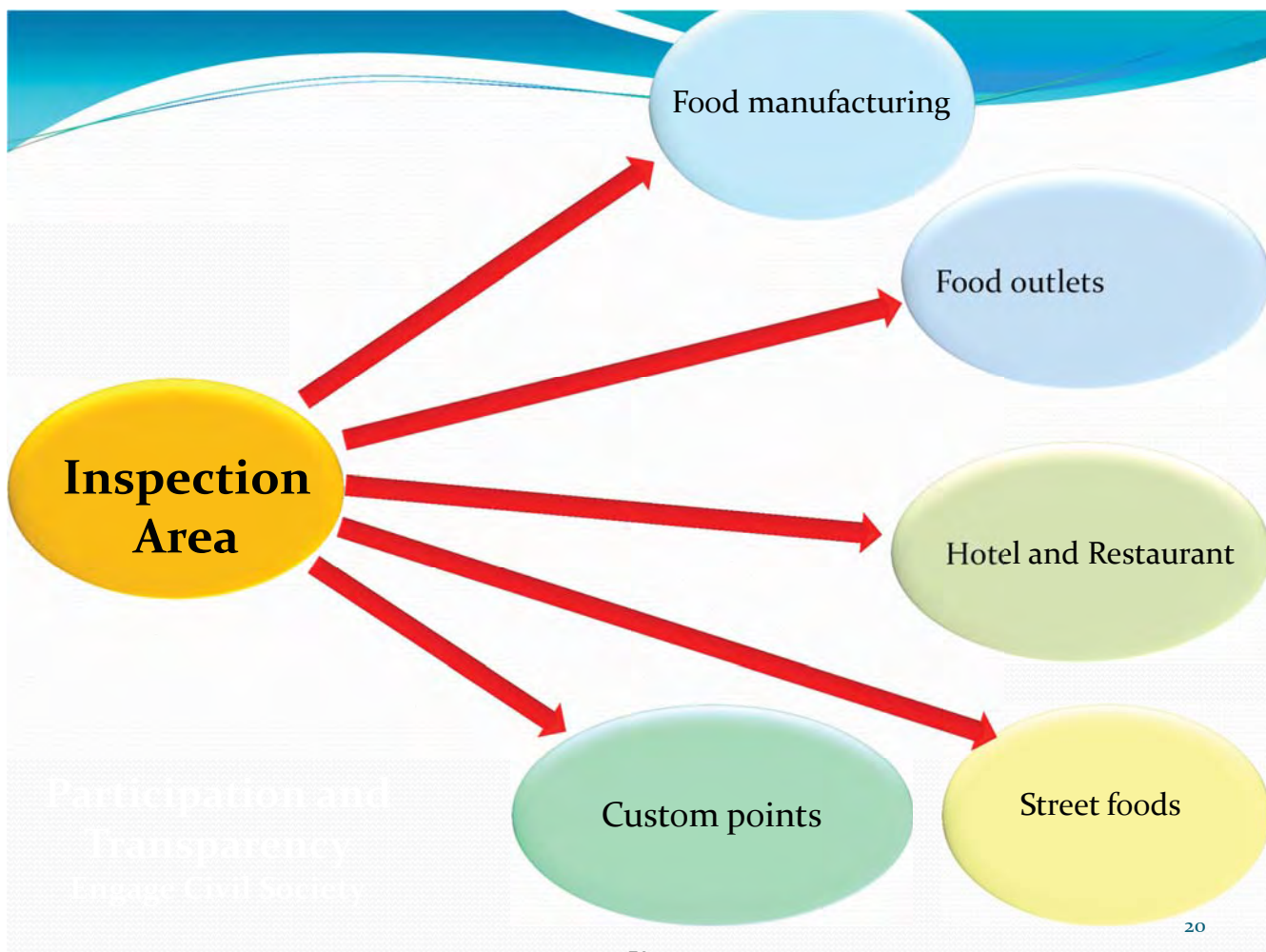
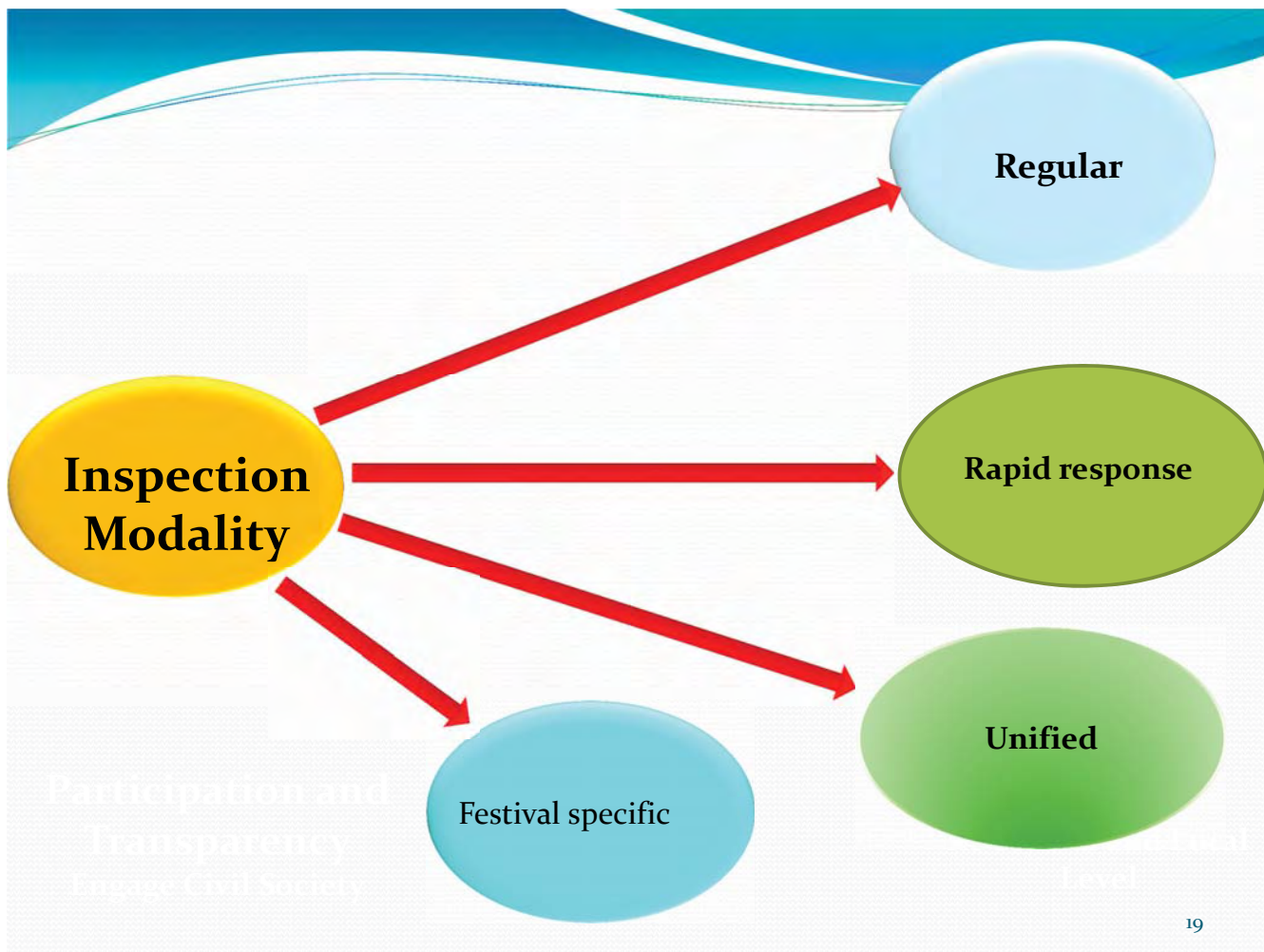
Other acts and rules Concerned with Food Safety

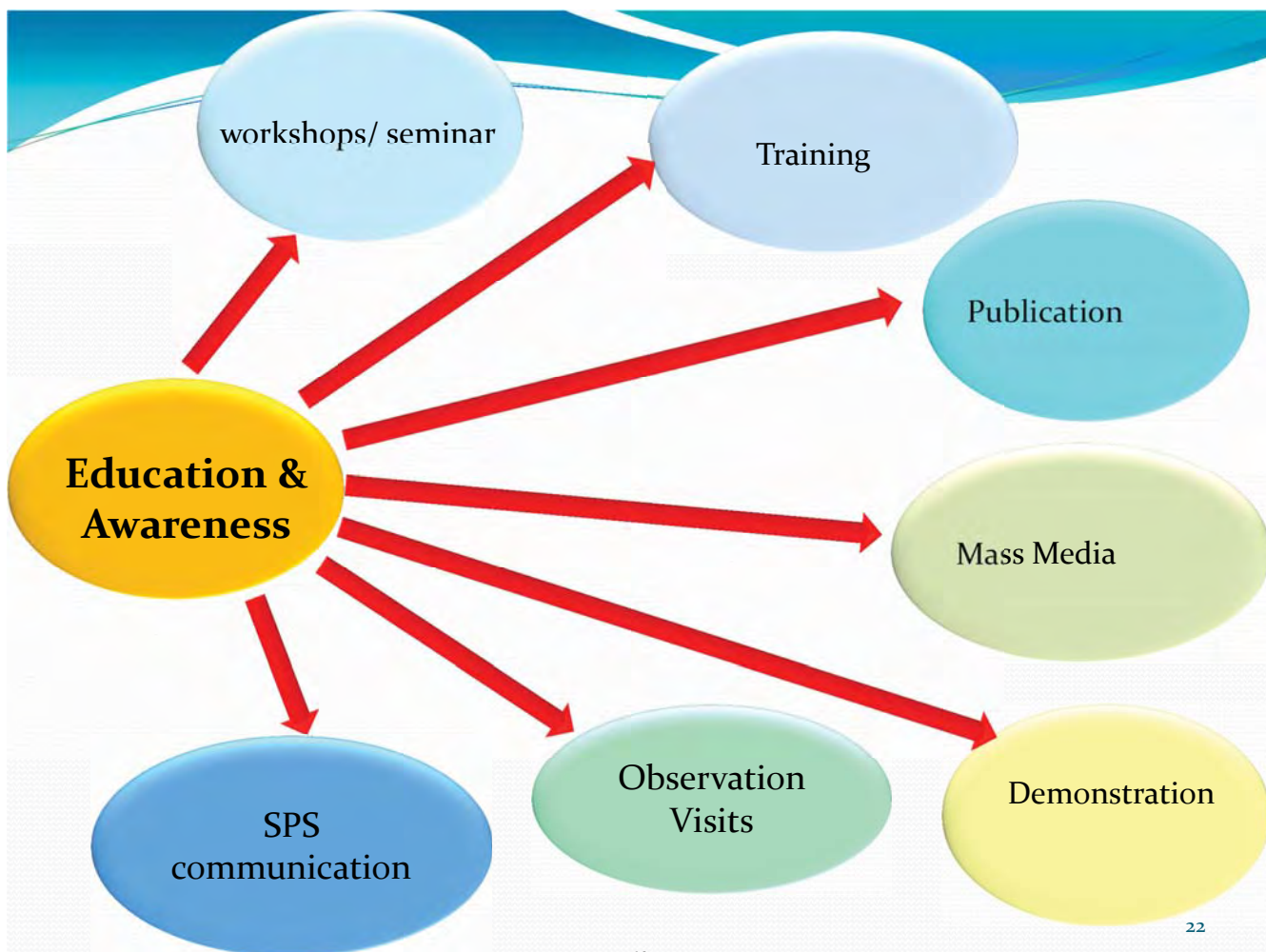
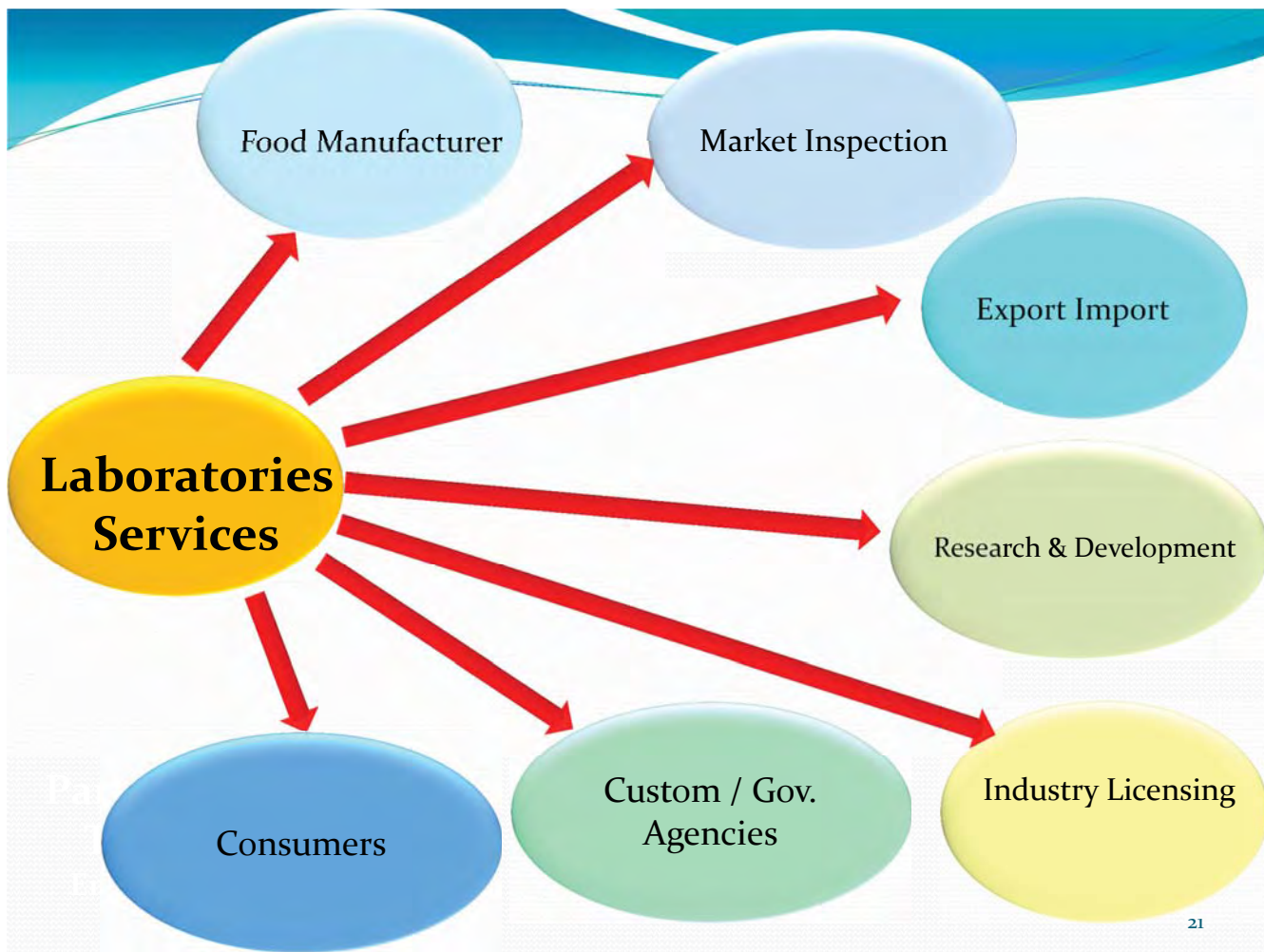
Act/Rules	Implementing Institutes
Consumer protection Act 1998	DOCSM, MOCS
Slaughterhouse and Meat Inspection Act 1998	DLS, MOAD
Local self-governance Act 1999	VDC, Municipality, MOLD
Nepal Standards (Certification mark) Act 1980	NBSM, MOI
Animal health and livestock service act 1998	DLS, MOAD
Pesticide Act 1991, Pesticide Rules 1994	DOA, MOAD

[Note: DFTQC: Department of Food Technology and Quality Control, MOAD: Ministry of Agricultural Development, DOCSM: Department of Commerce and Supply Management, MOCS: Ministry of Commerce and Supplies, DLS: Department of livestock Service, VDC: Village Development Committee, MOLD: Ministry of local Development, NBSM: Nepal Bureau of Standards and metrology, MOI: Ministry of Industry, DOA: Department of Agriculture] 17

Highlights

3. Department of Food Technology & Quality Control (DFTQC) & its network





Case filing procedure

- Food inspectors collect samples from the market places/ industry.
- Sample send to public analyst
- Public analyst issue analysis report to food inspector
- If non compliance with standard, inspector submit report to Director General ,DFTQC.
- DG appoint the investigating officer (food inspector) for the case.
- Investigation officer investigate/ enquire the case and submit his finding to district attorney for approval to case filing.
- After approval; the case is filed to Chief District Officer.

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Highlights

4. National Food Safety and Quality Control System & DFTQC activities

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Initiation of new activities for food safety

- Rapid response team for instant inspection action on consumer complains
- Mobile Inspection Lab Van for inspection of hotel restaurants and eateries
- Food safety sticker program for categorization of highway hotel and restaurants
- Team inspection (different sectors) for food market inspection
- Preparation of microbiological lab of CFL for accreditation as per ISO 17025
- Preparation of Regional Labs for accreditation as per ISO 17025

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Sticker for Categorization of Food Safety in Hotel/ Restaurants/ Eateries



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Highway Hotels/Restaurant Inspection: Hygiene Checklist

SN	Criteria	Grading				
		5	4	3	2	1
1	Registration to local Government / Pan No					
2	Distance between Hotels and Highway / Road					
3	Personal hygiene and grooming					
4	Trained and skilled staff					
5	Hand wash / hand towel / napkins / dryer condition					
6	Condition of water supply/ sources					
7	Lighting and ventilation facilities					
8	Kitchen hygiene, cleanliness and fire system					
9	Food storage (Perishable & non perishable)					
10	Condition of store (Dry/ chiller/ fridge) and prepared foods					
11	Condition of kitchen equipments (knife/chopping/board/utensils)					
12	Condition of wiping clothes					
13	Inventory system					
14	Pest and pet animals control system					
15	Condition of dish washing areas					
16	Left over food management					
17	Waste management system					
18	Record keeping of receiving goods					
19	Toilet cleanliness					
20	Re use of cooking oil					
	Total					

Marks above 90%=Green, 70-90%=Yellow with single red band, 50-70%=Yellow with double red band, below 50%=Red and (Close)

Operation of Mobile Lab Van



Spot Test in Mobile Van



5 keys of Food Safety



Collaborative works in food safety

National

- Government Agencies
- Local Government
 - Hotel grading
 - Street food
- Consumer Forums
 - Awareness programs
 - Team inspection in food market
- Private sector
 - Guidelines preparation
 - System certification
- Academic
 - Internship
 - In service study

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Collaborative works in food safety...

International

- **EC-Nepal WTO Assistance Program**
 - Funded by European Union
 - Support on trade facilitation in SPS component
- **FAO**
 - National Biosecurity Policy Framework
 - Training
- **WHO**
 - Risk based food inspection system
 - Food safety guidelines
 - Strengthening National Codex Committee
- **UNIDO**
 - Capacity building of laboratory
- **PTB**
 - Technical support in strengthening laboratory
- **International Food Policy Research Institute (IFPRI)**
 - Funded by USAID
 - Support on food safety policy, food regulation and standards
- **IFC (Tourist level hotel grading)**

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Focal point for International Relation



**SPS National
Enquiry Point**



**Codex Contact
Point**



**International Food Safety
Authorities Networks
(INFOSAN) Focal Point**

**INFOSAN Emergency
Contact Point**

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Codex related activities in Nepal

- Nepal is member of Codex since 1974
- Establishment of National Codex Committee since 2004
- Function of Codex Contact Point of Nepal – Director General, DFTQC
- Participation in Codex Committee Meetings
- Initiation of harmonization of food standards in compliance with Codex (Milk powders, Honey, Ginger, Instant noodles etc.)
- National Codex Secretariat at DFTQC

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Highlights

5. Issues and Challenges

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Present Issues and Challenges

1. DFTQC

- Development of food safety policy
- Update of Law and regulation
- Harmonization of standards, guidelines
- Infrastructure networks
- Capacity and competency
- Coordination and communication
- Human resources

2. Private sectors

- Compliance of law and regulation
- Implementation of Quality assurance tools (GAP, GHP, GMP, HACCP, ISO 22000)
- Management commitment on food safety
- Capacity building of working personnel

3. Academic Institutions

- Upgrade and update of curriculum
- Practical knowledge and skill
- Collaboration with government agencies in R & D
- Competent human resources

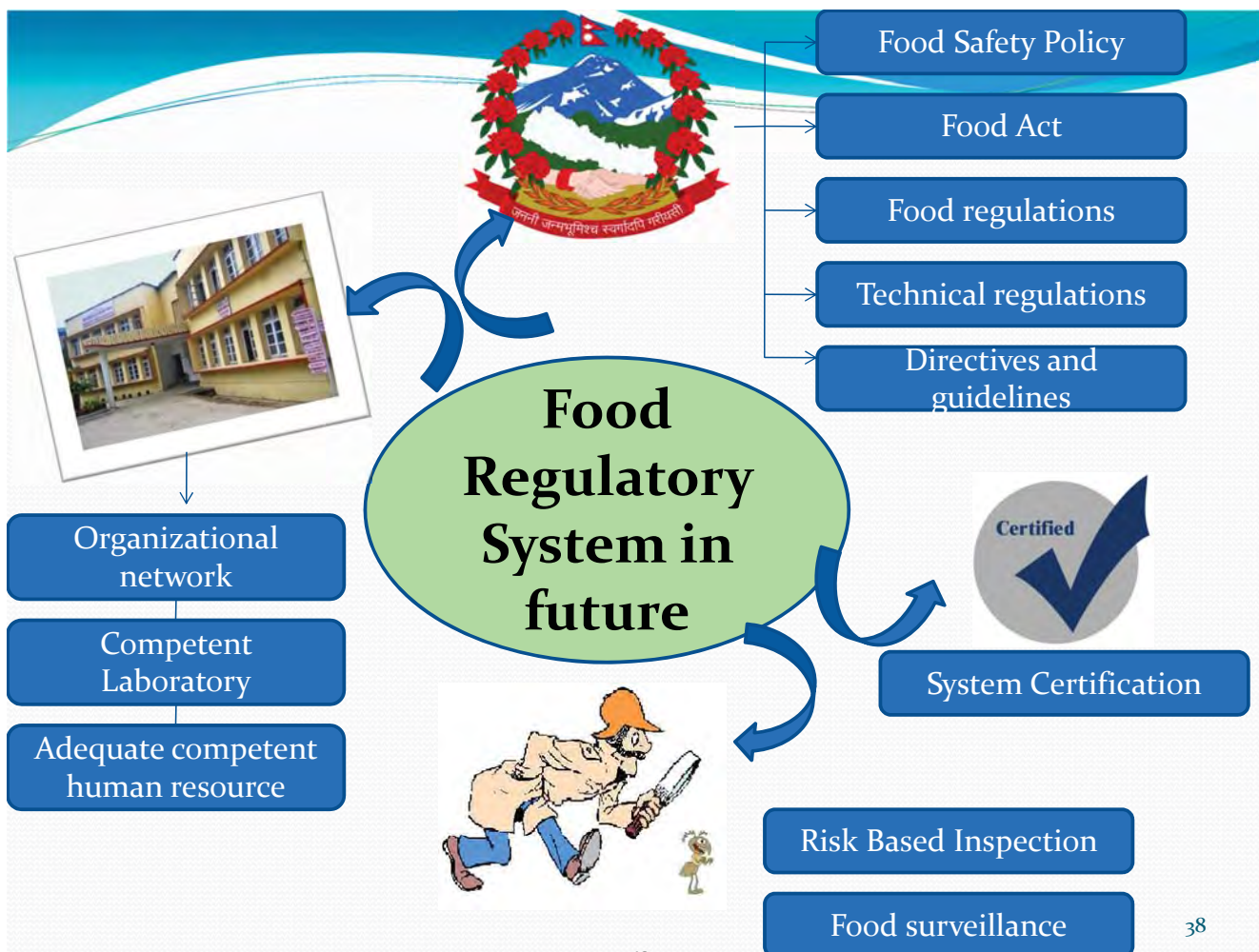
4. Consumer/ Forum

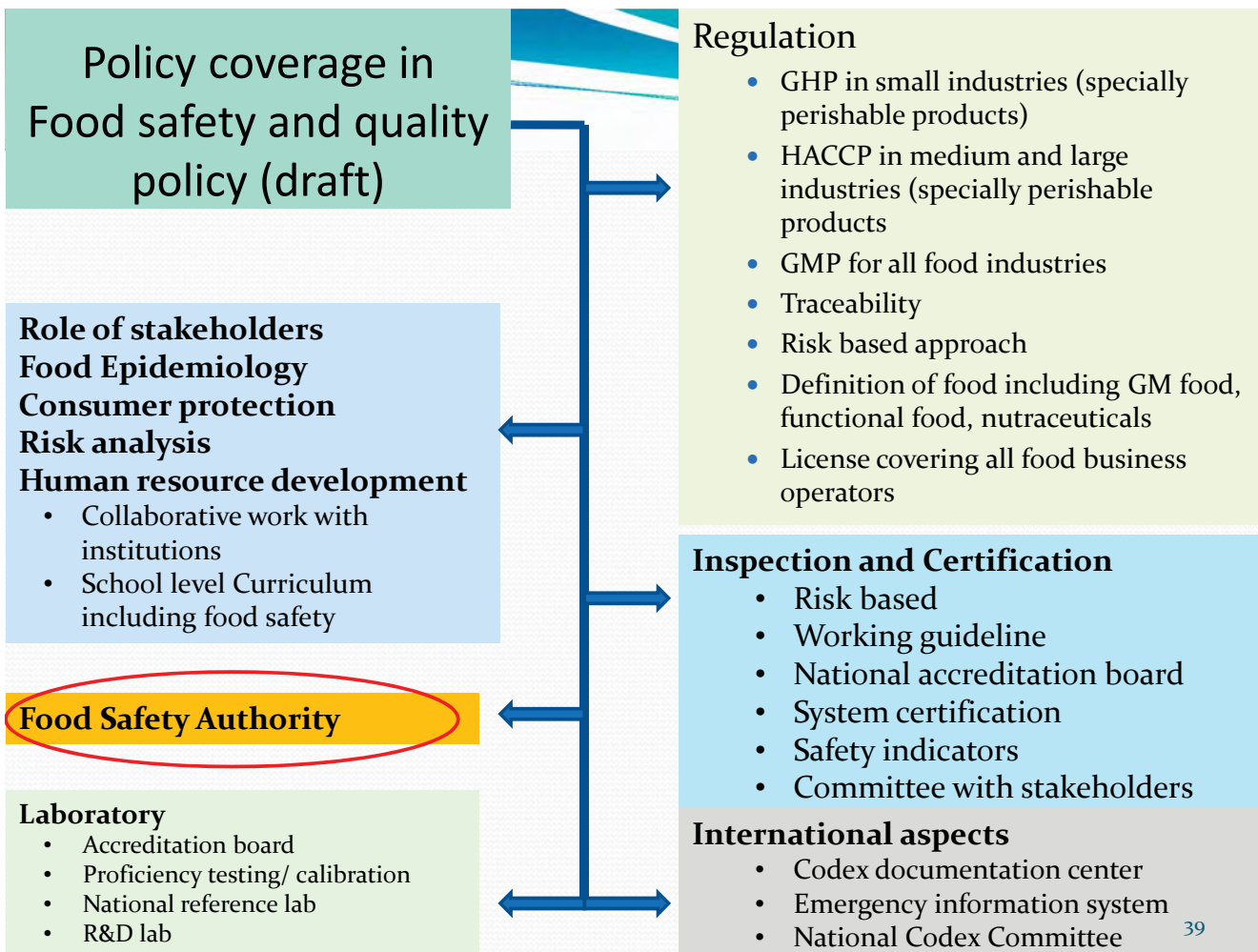
- Awareness on food safety
- Sharing of information and communication
- Focus on pro-active activities

36

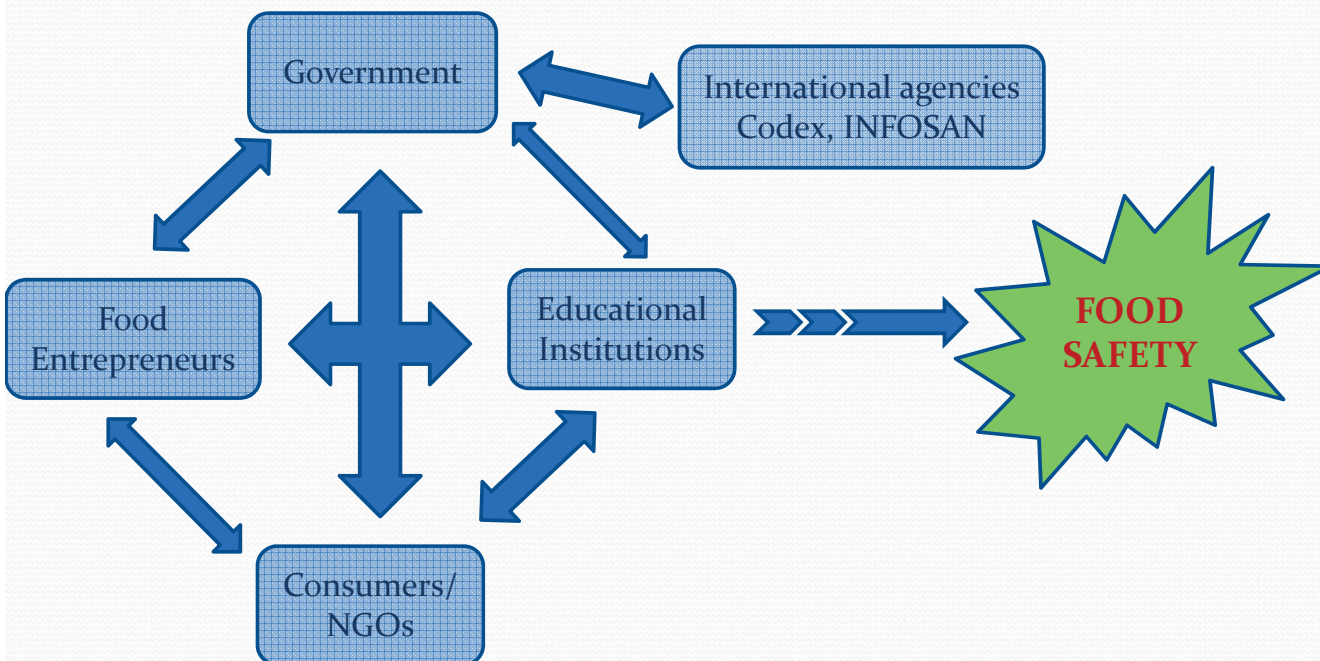
Highlights

6. Future perspectives





Coordination and Collaboration with Stakeholders for Food Safety



Is our food safe?

- Allergens
- Veterinary drug residues
- food additives
- Pathogens
- Pesticide residues
- Mycotoxins
- Unhygienic practices
- Heavy metals
- Genetically Modified Foods

41



Food, if not safe, is not food

Thank You!

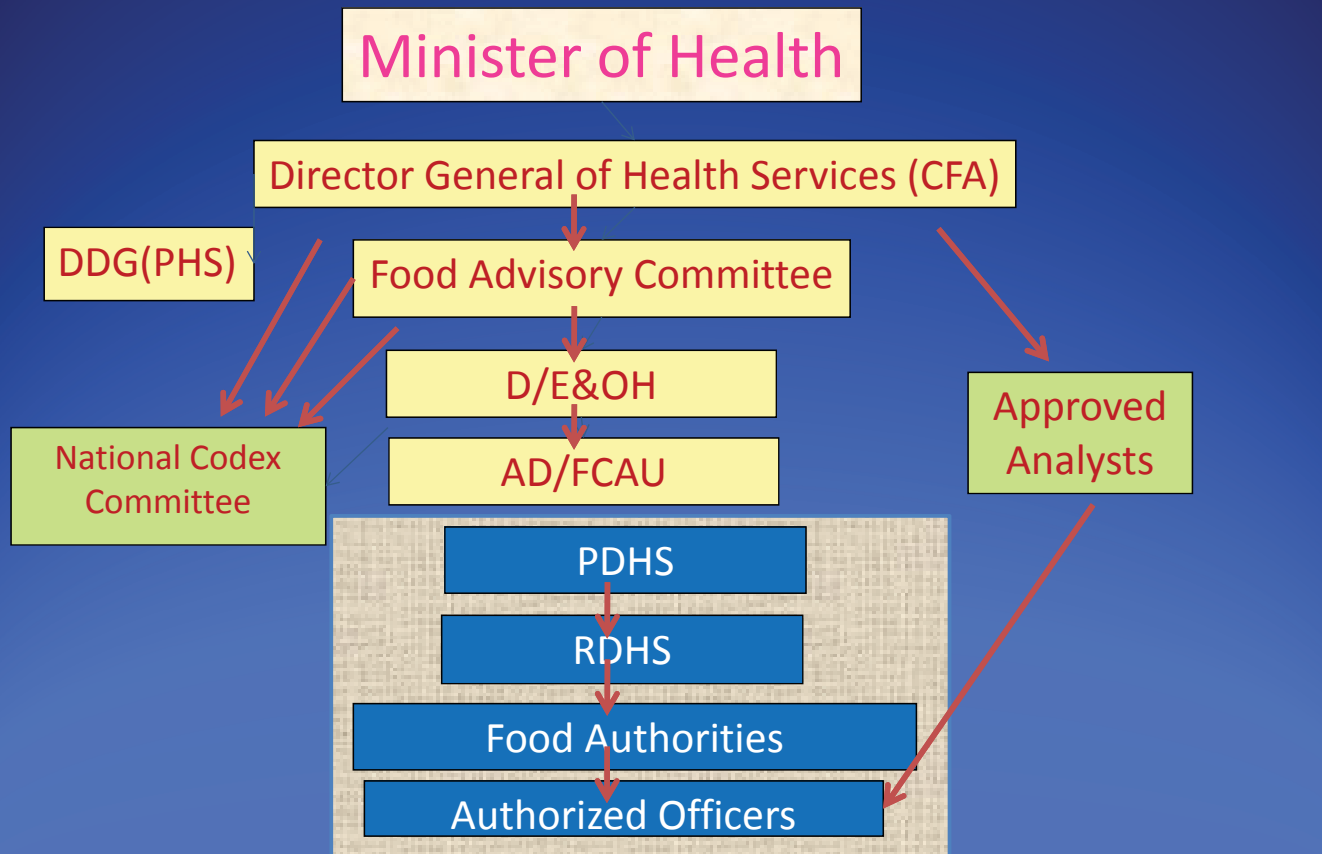
Food Control System in Sri Lanka

Dr. Ananda Jayalal MBBS, MSc, MD

Director Environmental Health, Occupational
Health and Food Safety
Secretary, National Codex Committee / Codex
Contact Point
Ministry of Health Sri Lanka



Food Control Administration in Sri Lanka



Basic Implementation Structure



Regulatory Framework

- Food act No 26 of 1980 and amendment thereto -1991, 2011
- Regulations made under the Food Act
- Other legal enactments

Food Act No 26 of 1980

An Act to Regulate and Control

- Manufacture
- Importation
- Sale / expose for sale
- Store
- Distribution of food

**FOOD
ADVISORY
COMMITTEE**



**Central Food control
Administration
(Chief Food Authority)**

**IMPORT FOOD
CONTROL SYSTEM
FOOD AUTHORITY:
DG CUSTOMS
ASSISTED BY FOOD
INSPECTORS**



**Central Food control
Administration
(Chief Food Authority)**

Central Food control Administration (Chief Food Authority)



ANALYTICAL
SERVICES

Strengths

- Longstanding well established System
- Food Advisory Committee consist of good representation from all aspects of food safety include food Technology and analytical fields
- Adoption of Codex standards

Weaknesses

- No standalone Food Safety Institution
- Legislation need revision to match present day needs
- Conflicting Legislation
- Inadequate Institutional Capacity
- Inadequate trained personal
- Inadequate Analytical capability

Opportunities

- Public interest in safe food
- International Support
- Availability of large database internationally
- Competitive environments
- Technology

Threats

- Competitive Institutions
- Incorrect information to Public
- Resistance to Change
- Existing HR practices

Thank you