Voice for Change Partnership

Development of a Food Safety Policy Framework for Kenya: Lessons and Best Practices from the Vietnam Experience

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November 2018

ILRI, Nairobi

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Executive summary

Food safety is gaining traction in Kenya due to growing public health concerns for domestic and international trade. Past efforts to establish a food safety management system and a coordination mechanism have not borne fruit. Thus, ongoing efforts and advocacy initiatives are seeking greater science-based evidence to convince policy makers and stakeholders to take the issue of food safety more seriously.

This report reviews the process adopted by the Government of Vietnam in developing its food safety policy framework with the view of drawing lessons and best practices that Kenya could consider in its own efforts to develop a modern food safety policy framework.

The process followed in Vietnam was driven by the felt needs of the general public. These needs attracted the political will and leadership of the highest office in the land to initiate an inclusive agenda to improve food safety management in the country (domestic and export market). The Kenya process requires: i) building on the big four agenda—that includes access to adequate safe food (food security) and health for all—to which the country's top leadership is committed; ii) convening of an inclusive multi-stakeholder approach with the participation of local and international players in food safety to drive a modern food safety framework using science-based evidence to target priority food safety issues of the key value chains for domestic and international markets; and iii) establishing an effective, well-coordinated, accountable, adequately resourced and responsive risk-based food safety control system (with a clear policy, legal framework, institutions, fit for purpose laboratories and a monitoring system) and a foodborne diseases/illnesses surveillance system. The Food Control System should be supported by sustainable capacity development and retention to guarantee effective delivery.

Introduction

Food safety poses public health and human well-being challenges, especially in developing countries where food insecurity is endemic. It is gaining increased attention globally due to public health concerns. The key drivers of the growth in food safety concerns include increasing consumer population and unprecedented growth in international food trade. The effective management of food safety awareness and intensification of food production to meet the needs of a high and growing population are therefore necessary for public health, food and nutritional security and sustainable development.

Kenya sits at the heart of this global challenge as a result of rapid urbanization and increasing awareness of food safety issues; growing agricultural intensification; economic reliance on agriculture; food imports and exports; and the absence of an effective food control system. Additionally, most food consumed in Kenya is produced and traded by smallholders whose ability to maintain effective food control standards is questionable. This, viewed against the backdrop of disjointed institutional arrangements, a weak policy environment and lack of a sustainable coordination mechanism portrays a population exposed to foodborne hazards. Kenya is endemically food insecure and therefore would benefit from a structured approach to food safety management. The country therefore faces the dual imperative of assuring access to sufficient and safe food for its population. This cannot be realized without a dedicated well-meaning policy framework.

Kenya's top leadership has identified health and agriculture among the big four agenda as key priority areas for the nation's development agenda. Although the effective management of food safety may ideally involve more actors, these two sectors form the foundation for an effective food safety management system.

In walking the path of developing a food safety management system, Kenya has the opportunity to learn from countries with a similar context that have gone through a similar experience. The process used by Vietnam is especially relevant for Kenya. Vietnam like Kenya is a developing

country with aspirations to middle income status, has a largely rural population where agriculture is the economic mainstay, and bears similarities in governance structure and value chain operations. The country conducted an elaborate exercise to successfully establish a national framework for food safety management. This review draws on the lessons learnt and best practices from the Vietnam process and makes recommendations for Kenya.

Purpose of engagement

This study is an engagement by the Regional Strategic Analysis and Knowledge Support System (ReSAKSS) of the International Food Policy Research Institute of the Consultative Group on International Agricultural Research (IFPRI/CGIAR) to support civil society organizations advocacy on food safety policy with science-based evidence. Civil society organizations are engaging policy makers at national and county levels, private sector actors and consumer organizations to develop and implement interventions to enhance food safety. This report therefore lends support to these efforts. The purpose of this part of the assignment is to review how Vietnam developed and implemented a food safety framework, draw parallels with the situation in Kenya, and recommend the best practices that Kenya could adopt.

Methodology

The study team conducted a detailed desk review of the approach, processes and actions taken by Vietnam towards development of their Food Safety Risks Management Framework. The aim was to identify enablers and constraints to setting up a food safety policy framework for Kenya. The review also identified lessons learned and best practices from the Vietnam framework process, and make recommendations for Kenya. In this regard we reviewed several documents: World Bank (2006, 2016); FAO (2014); WHO (2012) and three Vietnam project websites (https://cgspace.cgiar.org/handle/10568/69432, http://www.worldbank.org/en/news/press-release/2017/03/27/new-report-offers-a-path-to-manage-food-safety-risks-in-vietnam and http://www.fao.org/save-food/resources/keyfindings/en//).

Findings

Identification of the Need/Contextualizing the Need

A representative survey in Vietnam found that food safety was one of the two most pressing issues for people, more important than education, health care or governance (World Bank, 2017).

This felt need by the Government of Vietnam and the general public led to the formation and convening of the multisectoral Food Safety Working Group (FSWG) by the Deputy Prime Minister of the country. International agencies and bilateral organizations were also represented in the FSWG. This was reinforced by frequent media reports and programmes featuring food safety concerns and highlighting incidents.

On attaining middle income status, Vietnam has seen a change in food preferences among its middle class and an increase in consumption of more animal source foods. The food system has also become more integrated regionally and internationally, both exporting and importing considerable volumes of food and therefore requiring greater attention to food safety and quality controls.

Due to heightened food safety concerns from both consumers and policy makers (Mai 2013; Hung Nguyen-Viet 2015; World Bank Vietnam 2016), the government requested an assessment of prevailing food safety risks in Vietnam, based on international best practice of risk assessment methodology to generate evidence and draw lessons.

The Approach

The Government of Vietnam adopted a multipronged approach to address the food safety problem. Besides using decrees and establishing institutional structures across the country's governance landscape, the government requested international stakeholders for an urgent assessment of prevailing food safety risks, based on international best practice of risk assessment. The Vietnam Government was ready to embrace an evidence-based approach to address the problem. This spawned an extensive consultative process facilitated by the World Bank and the International

Livestock Research Institute (ILRI) with the active participation of the FSWG. The key interventions in the process included a round table discussion on food safety which entailed consultation with leading experts, practitioners, researchers, officials and businesses community, review of databases, policies, publications and reports, visits to government and private sector institutions and other actors, and finally a stakeholder consultation workshop to present the technical report and collect feedback from key partners. This generated a detailed situation analysis report which was summarized into a policy note that served as key findings and recommendations to the Government of Vietnam and other food safety stakeholders.

Institutional and Policy Architecture

A legal framework (the Food Safety Law 2010) was promulgated by the National Assembly to address the country's growing concern on food safety risks and its impacts on trade and public health. It is a modern framework that aligns with international standards and approaches to food safety management. The law states that food safety management must be conducted throughout the course of food production and trading on the basis of food safety risk analysis, thus covering the entire food chain 'from farm to fork', in line with the World Bank Group toolkit Pillar 1. Food safety responsibilities were assigned to three ministries, namely the Ministry of Agriculture and Rural Development (MARD), the Ministry of Health (MOH) and the Ministry of Industry and Trade (MOIT). Each ministry was assigned control of specific products across the entire food value chain, that is, from primary production, preparation, processing, storage and import–export to wholesale and retail distribution of these products. MOH, through the Vietnam Food Administration (VFA), had the overarching responsibility for food safety in addition to its other specific roles.

Institutional framework

The MOH, has over-arching responsibility for food safety and was responsible for several commodities, food ingredients and packaging material. It has overall responsibility for the safety of food and drug production, food hygiene in the domestic market, unifying food safety policy, coordination of implementation and providing information about the safety of food in the country. MOH is also responsible for setting standards and technical regulations on criteria and safety

limits; tools and materials used for packaging and containing food; coordinating periodic reports from ministries, branches and provincial people's committees (public participation governance structures) on the management of food safety; and coordinating public awareness activities, responding to food safety emergencies and warnings on any food poisoning incidents coordinating with MARD and MOIT to develop joint actions on food poisonings when necessary.

MARD is responsible for food safety in agriculture, agroforestry and aquatic subsectors in the food supply chain, including related industries and wholesale wet markets. MOIT is responsible for some commodities and for retail marketing of food, namely markets and supermarkets. It is also responsible for safety of liquor, beer, beverages, processed milk, vegetable oil, powder and starch-based processed products and other products under the government's regulations, trade aspects of exported products, some industrial food products and the labelling of goods.

Besides these three ministries, the Ministry of Science and Technology (MOST) is responsible for laboratory accreditation and the development of standards and methods for quality control of imported and exported goods. The Directorate for Standards and Quality (STAMEQ) is responsible for standardization, metrology and the quality of goods and products, harmonization with international standards and laboratory accreditation under the auspices of the STAMEQ Bureau of Accreditation and the Vietnam Laboratory Accreditation Service.

Responsibilities between national and sub-national levels

Food safety management is decentralized between national and local governments at all levels (from provincial governments to district and commune levels of government), especially for the domestic sector. Local level management is carried out through People's Committees which promulgate local technical regulations, develop and organize implementation of regional master plans and take responsibility for food safety controls in respective areas.

However, the framework for decentralization is not standardized and varies between ministries and even between departments under ministries. The national ministries cannot enforce the norms or procedures at provincial and lower levels as accountability is largely horizontal and departments

only report to the relevant government level People's Committee. Reporting vertically by departments to the responsible ministry may happen, but this is neither formalized nor aligned across ministries and departments at national level.

Coordination

Coordination of food safety management among the three ministries is done by the Inter-sector Steering Committee for Food Hygiene and Safety (chaired by the Deputy Prime Minister and co-chaired by the Minister of Health). The committee's office is located at the Office of the Government but supported by VFA. VFA is also the national focal point for the Codex Alimentarius Commission, the International Food Safety Authorities Network and the Association of Southeast Asian Nations (ASEAN) Rapid Alert System for Food and Feed.

The country also has a National Target Program for Food Safety which has six components: (i) building capacity for food safety quality management; (ii) education and advocacy information for food safety quality management; (iii) building capacity for a food safety quality control system; (iv) prevention of food poisoning and foodborne diseases; (v) assuring food safety and hygienic agriculture, agroforestry and aquaculture; and (vi) assuring food safety and hygienic industrial production and trade. The first four components are led by MOH and the fifth and sixth by MARD and MOIT respectively.

To improve the implementation of the food safety law, the government has developed regulations and circulars on the responsibilities held by ministries and sectors, the required level of cooperation between them, allocation of tasks and cooperation among regulatory agencies in food safety management, cooperation in food safety inspection, and validation of knowledge on food safety, etc.

Coordination among the different ministries and other players is also facilitated by the national food safety strategy led by the VFA and the Sanitary and Phytosanitary (SPS) Action Plan (led by MARD) which are focal points allocated in each ministry with one full-time and one part-time officer.

Standards and technical regulations

Vietnam has mandatory and voluntary national standards. Mandatory national technical regulations are issued by MOH (but are developed in collaboration with other ministries) while Vietnamese national standards are issued by MOST and are voluntary. In addition, each ministry also develops its own voluntary standards which generally relate to good practices, namely Good Agricultural Practices (GAP), Good Agricultural Husbandry Practices, Good Manufacturing Practices (GMP) and adoption of Hazard Analysis and Critical Control Point (HACCP). The technical regulations cover areas such as limits of aflatoxins, heavy metals, microbial contamination, etc. and are mostly aligned with the Codex Alimentarius Commission.

There is no formal manner of carrying out a risk assessment. However, some small-scale research initiatives have carried out risk assessments on heavy metals, aflatoxin in nuts and related products and Salmonella in chicken, among others.

National Strategy for Food Safety

This strategy was set out through a decision at the Prime Minister level to: (i) ensure safety of food for consumers and emphasize the responsibilities and rights of the organizations and individuals producing and trading in food and of every citizen; (ii) implement the provisions of the Food Safety Law in a synchronized way through inspection, testing and management of food safety; and (iii) strengthen information and communication on food safety. The general objective of the strategy is that food safety master plans are implemented from production to consumption. Four specific objectives are laid down with specific targets for each:

1. Improve knowledge and practice of food safety among the target groups
2. Strengthen capacity of the food safety management system
3. Significantly improve food safety assurance in food producing and processing facilities
4. Effectively prevent acute food poisoning

The Vietnam National Codex Committee

The Vietnam National Codex Committee (VNCC) Board (six members) consists of leaders from relevant ministries (Health, Agriculture and Rural Development, Industry and Trade, and Science and Technology). Members of VNCC (46) include representatives from government agencies, food businesses, associations, universities and research institutes. The VNCC is the national liaison on all Codex Alimentarius Commission matters within the VFA. Generally, Codex standards are adopted in the country.

Inspection, enforcement, surveillance and control

A risk-based approach has been specified under the law. However, risk-based food control management is not being implemented uniformly across responsible ministries, departments and provinces. Following a risk-based approach across the board would ensure the best utilization of resources and lead to an effective food control system in the country.

In practice the three ministries follow different approaches and interpretations of the regulations. They also have different priorities in their inspection and enforcement strategies. While a national target programme has been developed under which the minimum target inspections have been specified for each ministry, no coordinated national framework or strategy exists that addresses the whole of the food chain in a risk and outcome orientated approach. MOH coordinates this national target programme and collates six-monthly reports. For products under the control of more than one ministry, inter-ministerial inspection teams are commissioned and overseen by the inter-ministerial steering committee. Inter-ministerial inspections are also conducted when there are complaints or food safety incidents or during special occasions/functions.

Although MOH has overarching responsibility for food safety, it has no authority to direct other ministries in their work to ensure that highest risk foods are targeted and prioritized. Similarly, MOH does not have capacity to set requirements for the quality and depth of reporting as this is based on the priorities and programmes of the different ministries. The major high value export streams are given far greater scrutiny and attention than domestic foods and food supplies.

MARD follows a risk-based approach for exports with food businesses being categorized into three—A, B and C—in order of increasing risk, depending on whether they meet the stipulated

requirements. Focus is then targeted towards improving Category C businesses. The export sector is handled at the national level by National Agroforestry Fisheries Quality Assurance Department (NAFIQAD). For the domestic sector, MARD develops protocols for implementation at provincial and district levels and sends monthly reports to NAFIQAD. For imports, NAFIQAD has worked out risk profiles for products under its supervision

The VFA operates through the inspection department at the head office, sub-departments in the provinces and clinics and health centres at the district level. VFA is also responsible for monitoring food safety incidents, overseeing imports and large national or transnational food businesses and for ensuring the quality and safety of bottled drinking water. The provinces are responsible for enforcement and inspection of larger food business operators who produce for large-scale distribution and of catering systems and larger restaurants. The food safety enforcement at district and commune levels is mostly on the small-scale and street food sectors.

The Bureau of Market Management under MOIT is responsible for inspection of large businesses at the national level while the smaller businesses are inspected at the provincial level by MOIT. The businesses are inspected, and licenses issued, followed by regular at least once yearly or on-demand inspections. Inspection is not risk-based. Laboratory testing is only done to confirm compliance against importing country requirements or imports where the cost is covered by the importer. Most domestic inspection and enforcement activities are qualitative in nature and are not supported by regular laboratory analysis. The laboratories used are those of MARD and MOH in addition to private accredited laboratories.

At the market level, wholesale markets are supervised by MARD and retail markets and supermarkets or convenience stores are covered by MOIT. Inspections are complemented by training consumers to identify safe food and enhance sustainability of the good practice schemes.

Surveillance

Vietnam still lacks a comprehensive national food safety surveillance system. Efforts in surveillance by different agencies are fragmented, weakly coordinated and poorly integrated. The data collected by different ministries through routine monitoring are not collated for joint use by ministries for risk-based food safety surveillance and controls. The country still needs to ensure that surveillance activities are consistent with international standards and that reliable information exchange systems are developed between provincial and national organizations. Surveillance systems are expensive and there are limited possibilities to recover costs from the private sector. Hence, lack of operational funding is a serious constraint for setting up an effective surveillance system in Vietnam. Laboratory capacity and funding are insufficient for routine surveillance or enforcement of related testing. There are laboratory data on exports and imports and some data from domestic inspection activities under the different ministries, but there is no overall plan or collation of national data for analysis and monitoring of foodborne diseases and food safety. An active food safety surveillance system in Vietnam is at the formative stages of development. It has components of integrated food safety surveillance such as market surveillance, surveillance of food business operators in manufacturing and service establishments, surveillance of imported products and surveillance of incidences of foodborne diseases. MARD and VFA carry out surveillance independently for their respective areas of responsibility. For MARD, residue and contaminant monitoring programmes are regularly implemented by NAFIQAD for the fishery sector due to its export focus. For MOH, surveillance systems for foodborne disease are under the authority of VFA. All health staff, whether they offer public or private services, are responsible for notifying food safety agencies at district or provincial levels when a suspected foodborne disease outbreak occurs in their area. When cases of foodborne disease are admitted at a health facility, the facility has to report the incidences of these cases regularly to a higher-level authorrity and ultimately to VFA. In severe outbreaks or those leading to deaths, preventive medicine services, health facilities or district food safety agencies are permitted to share data and reports beyond their jurisdictions. Statutory surveillance systems and outbreak investigation reports maintained by public health authorities in Vietnam are mainly passive. Foodborne and waterborne diseases are reported from lower level preventive medicine centres to higher level centres and ultimately to the general Department of Preventive Medicine at the MOH. VFA and food safety agencies mainly receive reports of food poisoning or gastroenteritis outbreaks where food transmission is suspected.

In Vietnam, only reports of outbreak investigations and hazard surveillance systems are used to monitor foodborne diseases. Other aspects of surveillance systems (such as notifiable foodborne disease surveillance, syndromic surveillance, behaviour risk factors, complaints and antimicrobial resistance systems) are not developed.

Import controls

Commodities come into the country through both formal and informal channels, hence the need for controls. The respective ministries are responsible for their products using the standards applicable for domestic purposes. The import control process is not well implemented, leading to concern among domestic producers who feel that they are not protected from cheap imports and consumers who doubt the safety of imported products. There is also no systematic reporting of non-conforming products detected at the borders, making it difficult to tell what in the market is safe or not.

The MOIT adopts some level of risk-based inspection in which products that consistently passed at accredited laboratories get the benefit of simplified procedures for the next year. There is zero tolerance for illegal imports. The MARD applies risk profiling for all imported products and, based on the same procedures, the levels of checks for imported products are determined. Vietnam does not have pre-export inspections in exporting countries, but it accepts test certificates of accredited laboratories of exporting countries. Good coordination exists with customs who inform the relevant departments on the arrival of consignments.

Export controls

For exports, the respective ministries are responsible for their groups of products. The standards used are those of the importing country. Major exports by value are fish and fishery products, coffee, cereals (rice), fruit, processed foods, vegetables and flour-based products. Each ministry handles its export control role differently. For MOIT related products, the food manufacturers are responsible for their product outcomes. They apply for externally audited International Organization for Standardization (ISO) HACCP programmes. The manufacturers are responsible

for monitoring primary raw product producers. Each food business enterprise in the value chain, from farm to processor to export markets, is responsible for actively managing food safety through a preventive risk-based approach so that the next downstream business can maintain food safety. Failures at any stage pass food safety risks to the downstream clients. Government inspection ensures manufacturers and primary raw product producers comply with government regulations and with international ISO HACCP programmes required by international importers.

Food safety laboratories

Each ministry (MOH, MARD and MOIT) has its own network of food safety related laboratory systems consisting of ministry or department laboratories, research institutes, professional centres and university laboratories. Some large provinces have their own experimentation and analytical service laboratories, for example, the Centre for Preventive Health Care and Technical Scientific Services on food safety. In addition, private laboratories provide experimentation and analytical services. The Deputy Prime Minister through MOH is in charge of the overall laboratory structure. The National Food Safety Laboratory (NFSL) network is the main diagnostic arm of MOH and plays the role of reference laboratory in food safety in Vietnam. It consists of laboratory units working at national, regional, provincial and district levels. The National Institute of Food Control (NIFC) based in Ha Noi is the national reference laboratory in the area of food safety under MOH. It also provides training for regional and provincial laboratories in advanced testing methods, supports provincial laboratories in developing and implementing ISO 17025 requirements, and provides proficiency testing programmes and reference material for food testing laboratories. There are 4 regional laboratories and each of the 63 provinces has a preventive medicine centre, although these have limited capacity to test for residues and contaminants. There are laboratories with limited capacities at the district level.

Accreditation of conformity assessments

To get accreditation, laboratories are required to implement quality management systems in compliance with ISO 17025. The laboratory is required to report its policy, organization, training activities, facility, equipment, method selection, standard operating procedures, sample treatment and competence assessment.

The official accreditation body in Vietnam, the Bureau of Accreditation, is under MOST. It offers accreditation programmes for laboratories (ISO 17025), medical laboratories (ISO 15189), certification bodies (ISO 17065) and inspection bodies (ISO 17020). All Bureau of Accreditation programmes for accreditation operate in accordance with relevant international standards to ensure they are harmonized and recognized internationally. The Bureau is currently a member of and has signed agreements on mutual recognition of the International Laboratory Accreditation Co-operation (ILAC), the International Accreditation Forum (IAF), the Asia-Pacific Laboratory Accreditation Co-operation (APLAC) and the Pacific Accreditation Co-operation (PAC). By the end of 2015, the Bureau of Accreditation had accredited 713 laboratories (including testing and calibration laboratories) as per ISO 17025, about 30% of which perform tests on food safety. The Accreditation Office for Standards Conformity Assessment Capacity (AOSC) is a third-party accreditation body in Vietnam. Established in 2009, it belongs to the Vietnam Union of Science and Technology Associations. It offers accreditation programmes for laboratories (ISO 17025), medical laboratories (ISO 15189) and certification bodies (ISO 17065). Proficiency testing is an important aspect for accreditation. Other organizations such as NFSL of MOH, the QUATEST 3 of MOST and the Reference Testing and Agri-Food Quality of MARD provide proficiency testing programmes.

Food safety training programmes

Universities and institutes have developed training courses on food safety. The Ha Noi School of Public Health offers a three-credit undergraduate training course on foodborne diseases and food safety risk analysis and the Vietnam National Agriculture University offers a two-credit course on risk analysis. In the health sector, several universities, schools and faculties currently providing training programmes on food hygiene and safety for both undergraduate and postgraduate students. These include the Ha Noi School of Public Health, Hai Duong Medical Technical University, the Preventive Medicine and Public Health Training Institute (Ha Noi Medical University), Hue Medical Pharmacy University, Thai Nguyen Medical and Pharmacy University and Thai Binh University of Medicine and Pharmacy. These universities and faculties have departments of food hygiene and safety which conduct research and deliver training courses on different aspects of food hygiene and safety for undergraduate and postgraduate students. Few universities currently

provide specific training courses on food safety risk analysis (including food safety risk assessment, food safety risk management and food safety risk communication).

Lessons and Recommendations for Kenya

Governance structure

Vietnam is a country of 93 million people, has an area of 33,000 km^2 and a poverty rate of 7%. It is clearly a more developed country than Kenya which has a population estimate at 45 million and a poverty rate of 36.1%. The Vietnam governance structure is multi-layered with national, provincial, district and commune compared with Kenya's with national and county levels. These devolved or decentralized levels placed a great strain on the surveillance and execution of the National Food Safety Policy Framework in Vietnam. Despite this, they successfully set up an effective food safety system because of their commitment. For Kenya, food safety policy framework implementation should cut across all levels of government (National and County). With the County Governments Act No. 17 of 2012 in force, which specifies the responsibilities of the two levels of governance, smooth implementation of a food safety policy framework should be possible.

Rationale for a food safety framework

Because of the rising population and rapid urbanization, food movements from different regions to the main cities in Vietnam were becoming complex and the country was also importing foods to cover deficits. In this context, food safety due to lengthy value chains became the concern for both the government and the people. Furthermore, evidence from the WHO Foodborne disease burden Epidemiology Group (WHO, 2015) shows that foodborne diseases contribute 243 million DALY while the combined burden of disease from HIV, malaria and tuberculosis globally was estimated at 163 million DALY (Murray et al., 2016) yet investment in food safety is meagre. Pires at al. (2015) reported that the 9 foodborne pathogens causing diarrhoea globally were responsible for over 1.8 billion cases and over 600,000 deaths, with 80% of these occurring in vulnerable populations (under 5s, the aged and the poor) in Africa.

Kenya is facing a similar situation to Vietnam: it has a rapidly urbanizing population, lengthy food value chains and is food insecure. UN-Habitat (2016) reports that 54% of the world population

live in cities and this is increasing the incidence of food insecurity in low and medium income countries. Thus, Kenya, just like Vietnam, needs to be concerned about domestic food safety.

Leadership

The Vietnam Government showed political leadership in: i) prioritizing food safety as an issue that required addressing; ii) inviting international partners to assist financially and provide human capacity to address food safety; iii) accepting to use the best practices—science-based evidence according to the international norms; and iv) forming a national food safety working group (NFSWG) that included not only nationals but also international partners and hosted and chaired by the Deputy Prime Minister.

Kenya can successfully develop a food safety policy framework by adopting an inclusive, consultative stakeholder engagement approach that incorporates local and international stakeholders (World Bank Group, WHO, Food and Agriculture Organization of the United Nations (FAO), World Trade Organization, The World Organization for Animal Health OIE, etc).

Promulgation of a Food safety policy/law

Vietnam initially had food safety policies and laws that were implemented by different ministries. It became clear that this resulted in overlapping mandates and wastage of resources. The country through the NFSWG adopted one food safety policy/law which identified the various ministries that had a stake in food safety and their roles.

Kenya needs to review the draft National Food Safety Policy 2013 and consolidate the food laws to avoid overlaps and to properly coordinate food safety. We recognize the new development in trying to set up a Kenya Food and Drug Authority which will have mandate over food safety amongst others. A casual look at the preliminary proposals in this document reveals lack of stakeholder inclusivity (it is wholly regulatory agencies) in the formative stages and over-consolidation of agencies under the KFDA which could be an hindrance to smooth transition. What has been lacking is an overarching framework for coordinating the multiple agencies currently involved in food safety. Multiple institutions working in a coordinated manner bring greater

benefits of collaboration, synergy and resource (capacities, infrastructure, financial, technical) sharing as is the case in Vietnam.

Coordination

Vietnam adopted a multi-agency model to address food safety issues. Kenya has a similar model, where many ministries have differing and sometimes overlapping mandates on food safety. To avoid turf wars which derail a well-meaning policy, the Government of Vietnam policy created an overarching agency anchored in food safety law (VFA) to coordinate the various ministries in delivering on food safety. An Inter-sector Steering Committee [ISSC) on food safety that reports to the overarching agency was formed to coordinate efforts. This committee is similar to the proposed inter-ministerial council proposed under the Kenya Food and Drugs Authority law, currently being drafted.

Currently, Kenya has the National Food Safety Coordinating Committee (NFSCC) which seems to have taken some of the functions of the proposed Inter-Ministerial Council. However, NFSCC as currently constituted is an ad hoc entity that cannot request for deliverables from other institutions.

Development of targets

Targets were developed to audit how the country was achieving the goals set in Vietnam. These were unambiguous and clear for the very different levels of governance. The Kenya food safety framework should give ample opportunity for the implementing bodies to develop targets for different levels of government for purposes of accountability.

Development of standards

The Vietnam standards body developed standards based on evidence gathered by the FSWG during two case studies (vegetables and pork value chains) and other studies in the country. While the Kenya Bureau of Standards (KEBS) develops standards for products in Kenya, inspection and compliance monitoring is missing to ensure the products meet the standards.

The body setting food standards should adopt a risk-based approach to standard development. Where evidence is lacking, precautionary regulation should be developed awaiting commissioned evidence gathering work.

Development of a Food Safety Strategy

The strategy developed by the Government of Vietnam offered various commitments by the government on how to achieve national food safety to reduce foodborne illnesses. These included: i). recognition that safe food is a human right for all; ii) the overarching goal of preventing acute foodborne infections and poisoning; iii) implementation of food safety should start from farm and move to fork; iv) commitment to strengthen the food safety control system (setting up of food laboratories, accredited, inspection and where possible inter-sector inspections); and v) establishing a surveillance system with proper reporting mechanisms from communes to the overarching agency—Vietnam Food Authority. In line with what the Vietnam Government has done, a food safety strategy with an explicit approach to risk communication and information, education and communication (IEC) should be developed for food safety in Kenya, just as the Economic Recovery Strategy (ERS) and the Strategy for Revitalization of Agriculture (SRA) were developed to guide Kenya's economic recovery in the past.

Developing a surveillance system

The Government of Vietnam established a surveillance system backed by competent fit for purpose laboratories that would collect, collate and report data to enable response to be taken. The country categorized products based on the degree of risk and the risky products were sampled more often while the less risky were sampled regularly at least once a year. This risk-based surveillance enabled proper utilization of resources.

Kenya's food safety control system has a surveillance system (institutions, laboratories and processes) but it is neither adequately resourced nor implemented. What is important to note is that in Vietnam, surveillance has been cascaded to commune level and this can equally work for Kenya if there is adequate resourcing and implementation commitment.

Setting up food safety capacity building programmes

The Government of Vietnam set up programmes to train personnel to handle the food safety issue at various levels. Training programmes were set up at graduate, undergraduate and intermediate colleges. Such programmes helped the country train and develop required personnel.

Food safety is not wholly institutionalized in the Kenya education programme, but aspects of food safety are taught in different courses as they fit in various universities degree programmes. This does not address food safety holistically to tackle both formal and informal food sectors. For Kenya to have an effective food safety management programme, the country must re-examine the food safety training at graduate, undergraduate, diploma and certificate levels.

Observations

Vietnam has invested a substantial amount of time and high level political commitment to develop a modern food safety management framework. The Vietnam framework exemplifies an appropriate approach and process and reasonable mechanisms for an effective national food safety system. The system covers all levels of governance and is inclusive enough to bring on board the key stakeholders. The review of the system identified functional gaps and inefficiencies associated with insufficient resourcing, breaks in coordination due to lack of standard operating procedures and common protocols and capacity asymmetry at different levels of the governance chain.

Kenya's governance system, regional hub status for food trade, predominance of smallholders in both production and marketing, export–import food safety and trade concerns among others, mirror the Vietnam situation. Thus, the Vietnam case study offers useful lessons and model examples on how to develop and operationalize a national food safety system. The biggest asset of the Vietnam framework was the strong political will and commitment of high level policy makers to food safety and the enactment of an overarching policy framework to coordinate different actors.

The proponents of food safety in Kenya must work hard to win the commitment of high level policy makers and overcome narrow sectarian interests to ensure a balanced and inclusive food

safety management system. A multi-stakeholder consultative process may be required to reach consensus on how best to enact a modern and inclusive food safety framework in Kenya.

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