

Benchmarking for Food Safety

DISCUSSION WITH COMMITTEE ON STRONGER FOOD AND DRUG
REGULATORY SYSTEMS ABROAD

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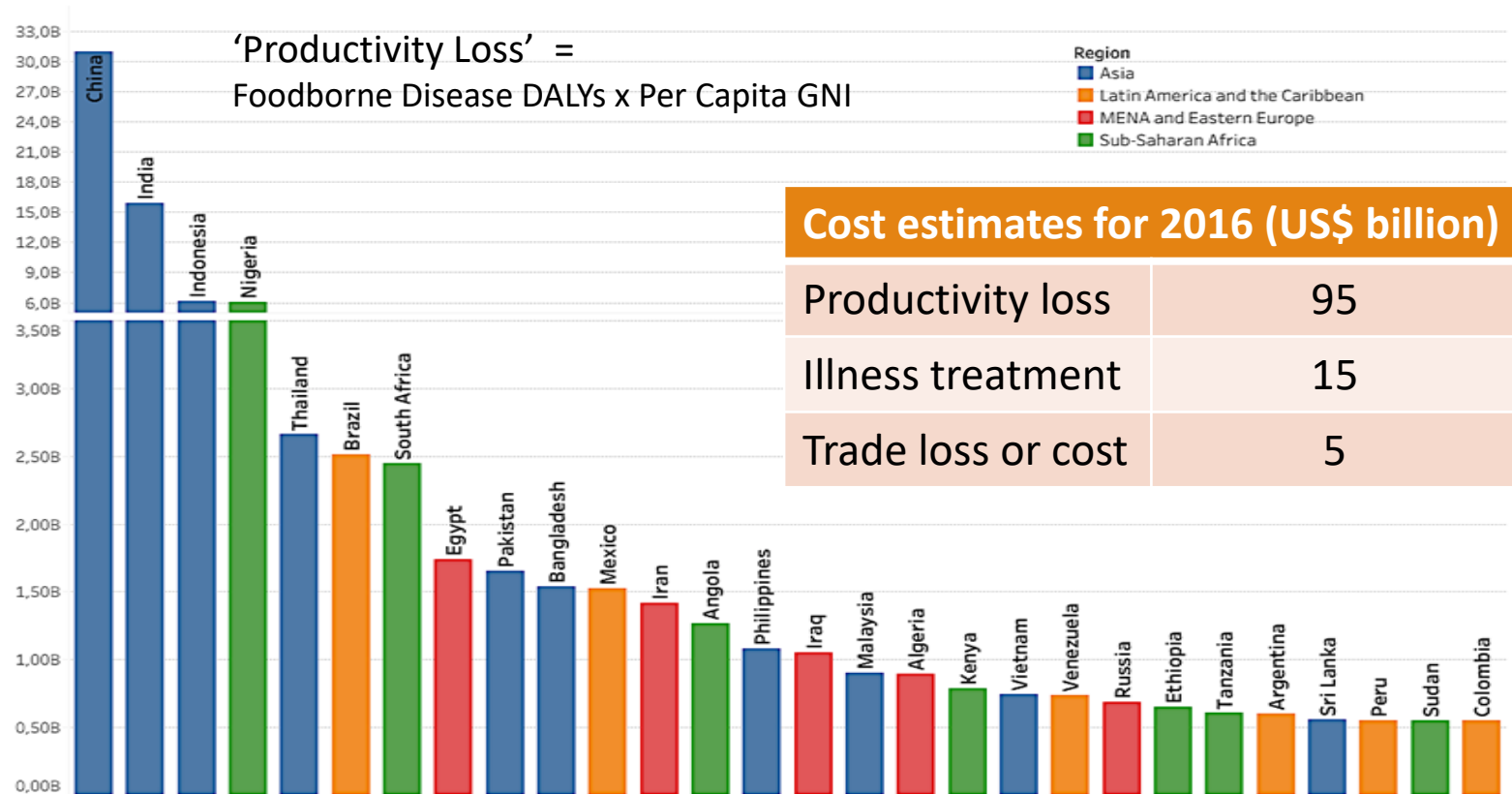




The Safe Food Imperative: Main Messages

- **Food safety is a mainstream economic development issue but has not been recognized as such.** Most attention and resources for food safety capacity-building have related to trade where the impacts are more visible and the stakeholders better organized.
- **Domestic food safety capacity typically features a policy vacuum, leadership void, data void, and pattern of underinvestment.** Concerted public action is normally reactive rather than preventative. Crisis management is more common than proactive risk management.
- **The gap between food safety capacity and actual needs is especially problematic among rapidly urbanizing lower middle-income countries.** For these countries, a 'business as usual' approach will result in large future public health and wider economic costs.
- **Yet, many of these costs are avoidable through preventative public policy measures, smarter investment and a paradigm shift in food safety governance and stakeholder engagement.**

In developing countries the public health and domestic economic costs of unsafe food may be 20 times the trade-related costs



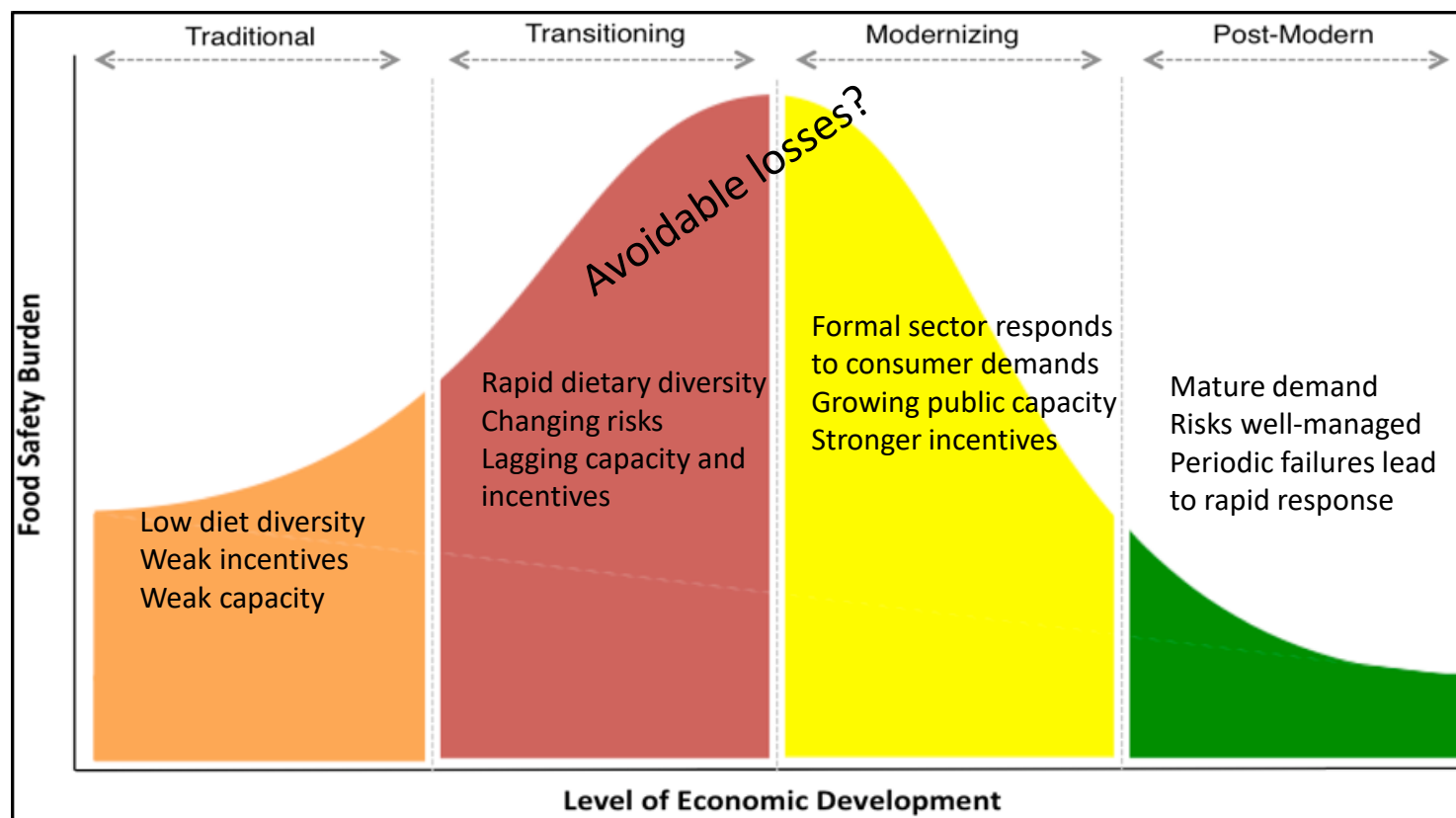
Based on WHO/FERG & WDI Indicators Database

Illness treatment =
US\$27 x # of Estimated foodborne illnesses

Trade loss or costs =
2% of developing country **high value** food exports

The Food Safety Lifecycle:

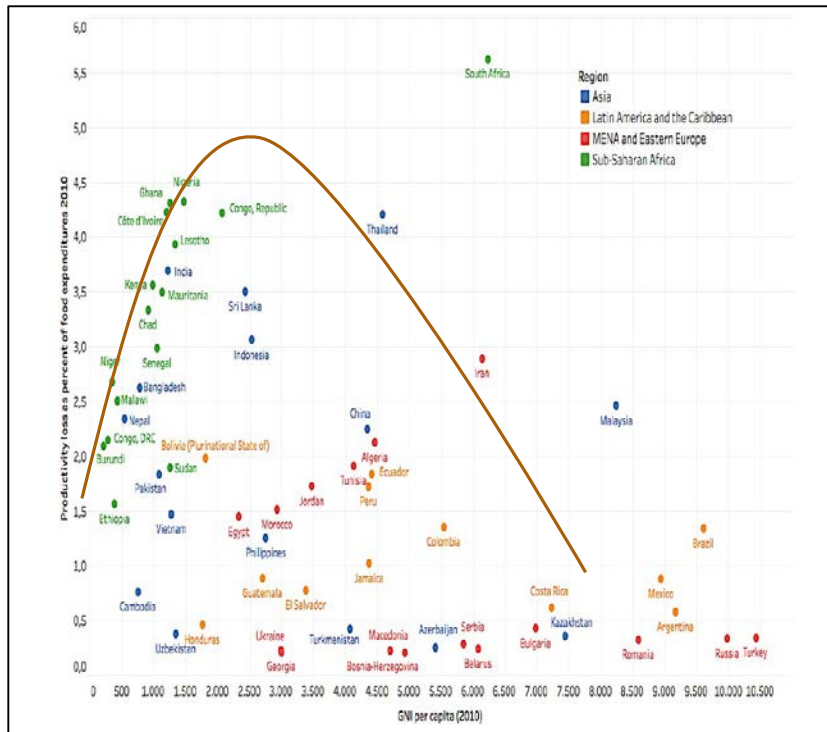
The economic burden of unsafe food is systematically linked to processes of economic development and dietary transformation



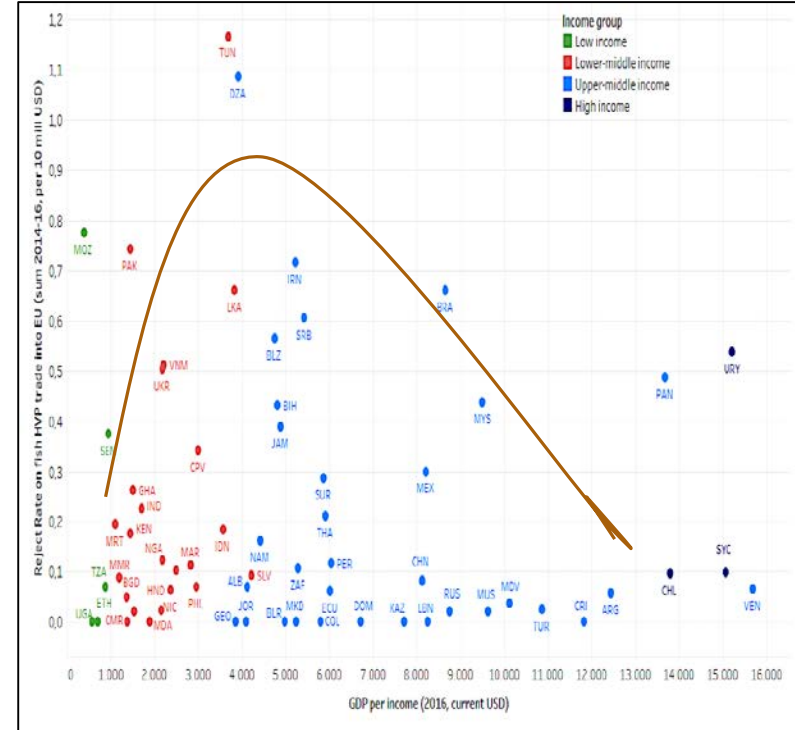
Reflects the relationship or gap between food safety needs and actual capabilities and incentives.
Today's lower middle-income countries represent the world's food safety 'hotspots'

Despite wide diversity, food safety performance is consistent with the inverted-U “lifecycle” concept

PRODUCTIVITY LOSS AS PERCENT OF FOOD EXPENDITURE (2010)



REJECTION RATES FOR FISH IMPORTS INTO THE EU (2014-16)



Challenges of benchmarking food safety

OUTCOMES/PERFORMANCE

- Burden of FBD: Data limitations so results rely on statistical models and are published by sub-regions and not for individual countries
- FBD outbreak data: Tip of iceberg. Most FBD is not reported.
- Food safety recalls: Few countries have functioning recall systems and/or reliable data
- Trade interceptions: Challenges interpreting border rejections, associated costs and relations to food safety capacity

CAPACITIES AND REGULATION

- Most objective assessments have restricted (non-public) access (i.e. OIE PVS; IICA PVS; FAO assessments)
- Limited value of self-reported 'yes/no' responses to surveys on laws & institutions, especially for functionality (i.e. WHO International health regulations core competencies)
- Absence of regulatory delivery and/or consumer trust surveys in most countries
- One-off assessments for selected countries don't gauge changes over time (i.e. UNIDO quality infrastructure survey)
- Few representative and comparable indicators for food safety management capacity in the private sector in most countries
- Narrow vs. broad definition of 'food safety capacity' (i.e. access to clean water)

The best benchmarking work—by the Conference Board of Canada—pertains only to OECD countries where far more data are available than for developing countries, where formal food distribution channels predominate, and where regulatory reporting is the norm.

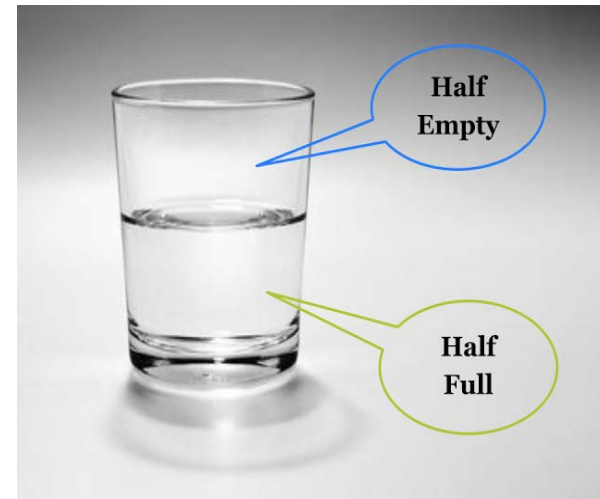
Qualitative assessments of food controls in many low and middle-income countries point to common shortcomings

Policy and rules

- ❖ No comprehensive national policy, resulting in a lack of prioritization
- ❖ Progress on food law; less on regulations to enable its enforcement
- ❖ Many standards; lack of clarity on their voluntary versus mandatory nature
- ❖ Lack of mechanisms for accreditation/certification of businesses

Institutional fragmentation and compartmentalization

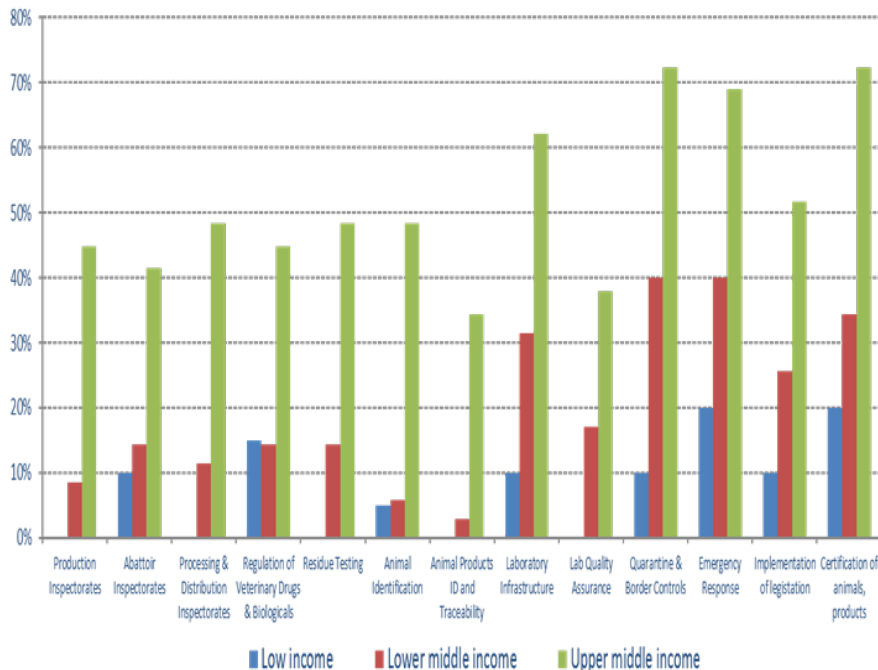
- ❖ Split of institutional responsibilities; at center and decentralized
- ❖ Disconnects between trade and domestic food governance
- ❖ No institutional coordination on market surveillance
- ❖ Enterprise Inspection is not risk- based
- ❖ Laboratory testing units not functioning as a cohesive network



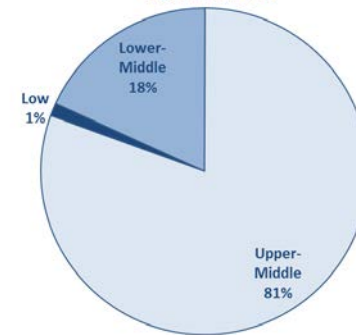
Sources: FAO assessments in multiple countries of South and Southeast Asia, 2015 to 2017

Many low and lower-middle income countries have only islands of food safety capacity in government and the private sector. The situation is much better for upper middle-income countries

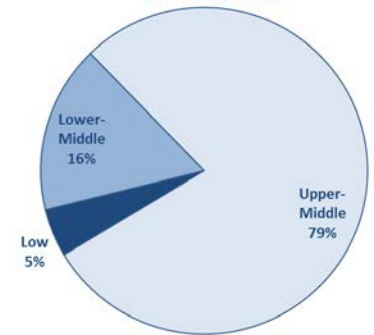
Government capacities related to animal product food safety



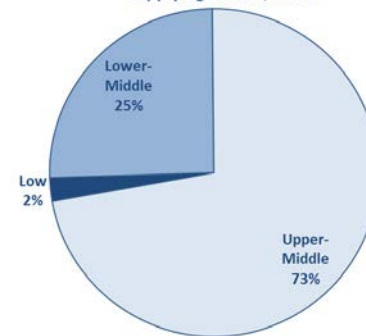
GlobalGAP Area of Coverage of Fruit & Vegetables, 2017



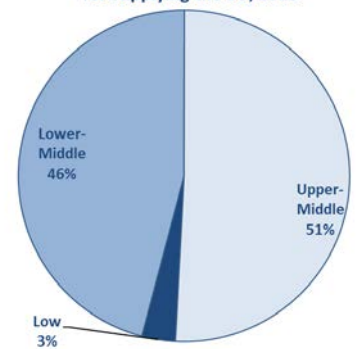
Organic Area of Fruit & Vegetables (farmland), 2016



Valid Registrations with USFDA for Supplying the US, 2018



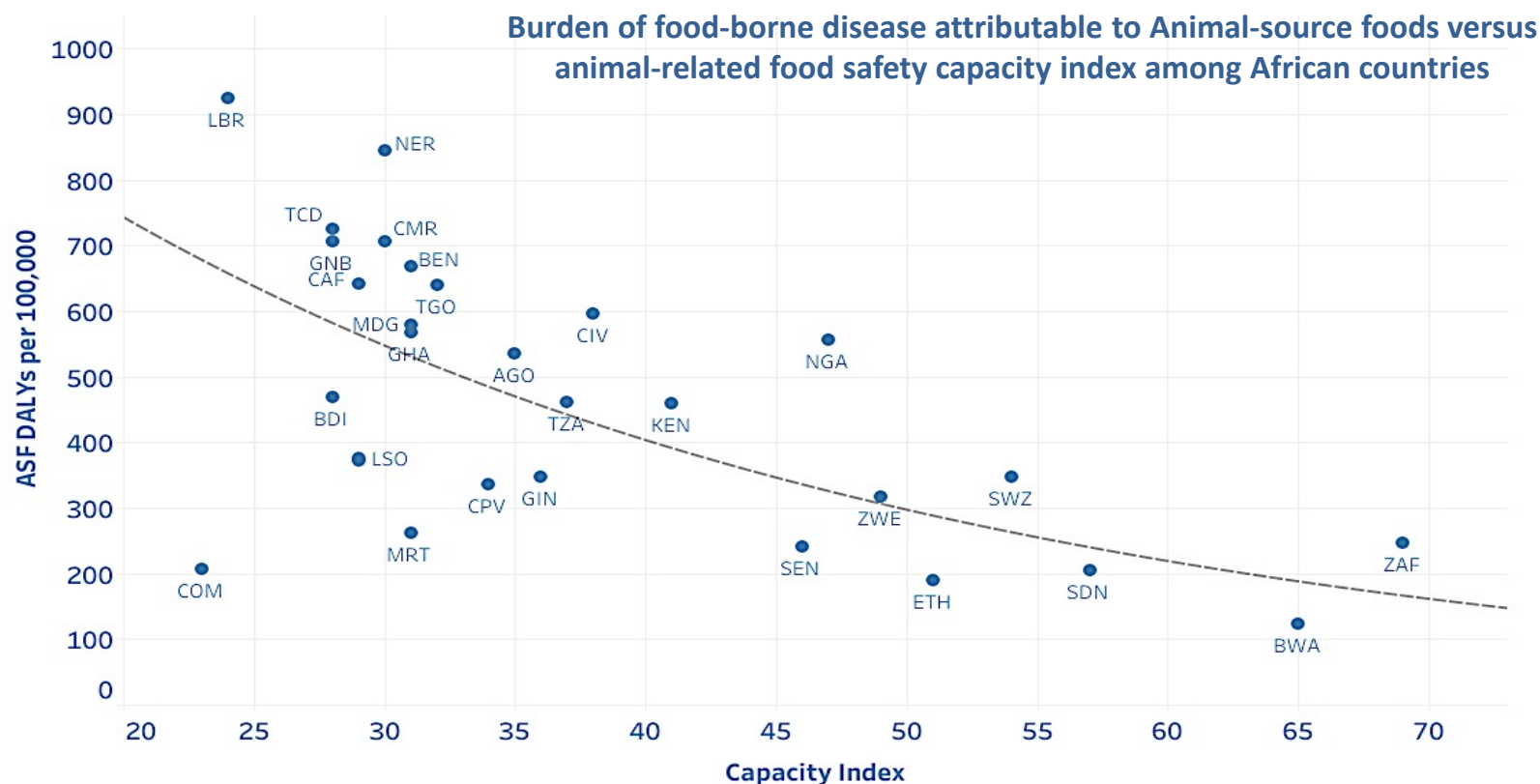
Approved Chilled/Processed Fish Facilities for Supplying the EU, 2018



Proportion of countries with adequate capacity: OIE PVS Assessments

Evidence that Capacity Matters:

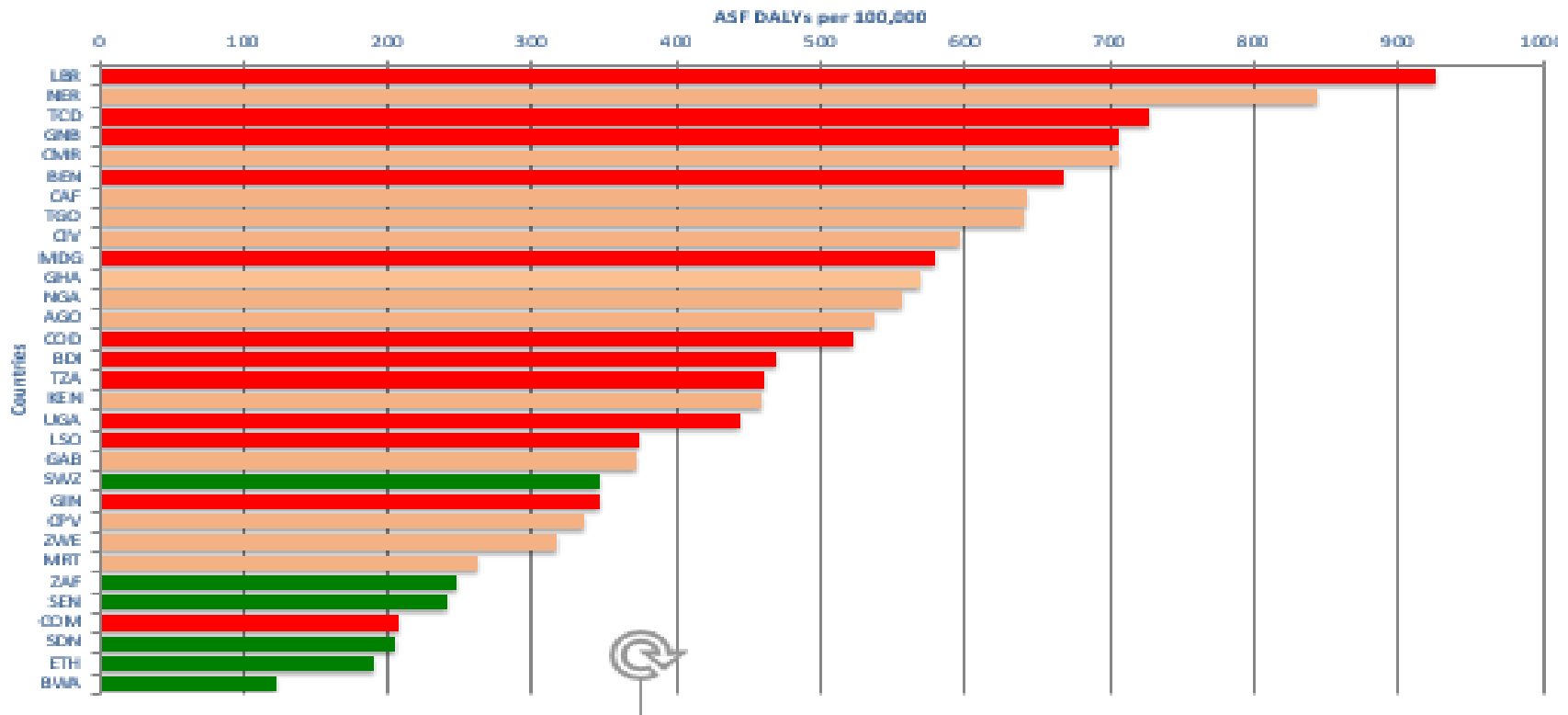
The burden of food-borne disease in animal-source foods is closely connected with related veterinary service capacities



Sources: Li et al (Forthcoming); Jaffee et al (2019)

You Get What You Pay For:
African countries with 'adequate' funding of veterinary services are
all clustered toward the bottom end of the ASF food-borne disease
burden. Inadequate spending is costly!

**Burden of FBD Attributable to Animal Source Foods vs
Rating for Adequacy of Operational Funding for Veterinary Services**



NOTE: Countries with inadequate funding in red (rating = 1) and in orange (rating = 2); countries with adequate funding in green (rating = 3 or 4).

Elements of a Benchmarking Scheme

PRINCIPLES

➤ **Form**

- Objective (expert) assessments
- Quantifiable indicators or ratings
- Interpretative ease -representative yet not overly complex

➤ **Availability**

- Publicly-accessible
- Manageable cost to assemble and maintain

➤ **Focus**

- Capabilities & commitment-- until better outcome data can be generated

MAJOR CATEGORIES

➤ **Commitment**

- Policy commitment, coherence, and stability
- Investment, operational and contingency funding

➤ **Capacity**

- Proximity to international regulatory norms
- Technical capabilities
- Human resources

➤ **Catalytic Outreach**

- Information and communication
- Measures to facilitate private sector action