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MISSION REPORT

TRADE PROMOTION IN TAJIKISTAN - PHASE III

6 to 12 November 2011

Report by

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Issues

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1. INTRODUCTION

This report covers the mission to Tajikistan of the ITC International Consultant on Sanitary and Phytosanitary Issues from 6 to 12 November 2011.

2. BACKGROUND

The overall objective of this project is to contribute to the sustainable expansion and diversification of SMEs' exports in Tajikistan through increasing the competitiveness of the textile and clothing industry and improving the quality management infrastructure of the country.

Immediate Objective 4 is to improve the capacity of SQAM and SPS bodies and the regulatory infrastructure. The first mission was conducted in November 2010 and the second in May 2011.¹

3. TERMS OF REFERENCE OF THE MISSION

The principal aim of the mission was to review the analysis of the distribution of roles and responsibilities for food safety activities between the various Ministries and agencies of the Government of Tajikistan, and to make a presentation on the results of this review to senior government officials and other interested parties.

The opportunity was also taken to present a high level seminar on management of modern SPS-related agencies.

4. PROGRAM DURING THE MISSION

The first part of the mission was set aside for working with the Local Consultant Mr. Kosim Kurbonov to prepare for the roundtable discussion held on 11 November. As part of these preparations we met with Mr. Saidrahmon Nazriev, Deputy Minister of Economic Development and Trade, who invited us to participate in an inter-Ministry meeting to be held later on 11 November to discuss the finalisation of a new food safety law for Tajikistan.

5. STREAMLINING OF SPS INFRASTRUCTURE

5.1. Review of food safety system

Since the previous mission the National Consultant (SPS), Mr. Kosim Kurbonov, had finalised the matrix (Annex A) showing which agencies engage in each of the very extensive range of individual SPS-related activities that comprise the national food safety system. The matrix contained information obtained by Mr. Kurbonov principally by interviewing the relevant administrative agencies, cross-checked with private sector representatives. It was reviewed in detail to identify gaps and duplication of activities, as a basis for recommendations for revising the distribution of roles and responsibilities between agencies taking into account appropriate principles for efficient and effective administration.

5.2 Options for reform of food safety system

In the report of the second mission we had noted that the optimal food safety system for Tajikistan is not a system that will ensure the highest possible level of food safety (because there are costs for both business and government associated with food safety controls) but the most cost effective system for achieving the level of food safety that is acceptable to the consumers of food (both food placed on the market in Tajikistan and food that is exported). The principles that should guide the framing of an appropriate food safety system include:

¹ See mission reports ITC/DCP/11/2924 & ITC/DCP/11/2925

- the primary responsibility for ensuring the safety of food rests with the enterprises and people who produce, handle and sell food; the role of government is to ensure that this responsibility is met;
- food control should be applied from farm to table so that safety is maintained throughout the stages of production and distribution;
- the food control system should be designed so that it uses public and private resources as efficiently as possible in achieving the appropriate level of protection, in particular by following a risk-based approach;
- the use by food enterprises of modern control techniques such as ISO 22000 and the HACCP system should be encouraged;
- the national food safety system should follow internationally-accepted norms and guidelines wherever appropriate and should conform fully with specific international obligations such as those under the WTO Agreement on the Application of Sanitary and Phytosanitary Measures.

Tajikistan's food safety system still shows strongly the influence of the pre-independence period in its reliance on an extremely elaborate set of food specifications that is enforced, in theory at least, by a system of product certification as well as other regulatory interventions. Desirable changes to the system would take into account the legitimate expectations of consumers, the likely course of development of food-based industry, the potential pattern of food exports and the official and private food standards that will apply to them, and so forth. The main elements that are needed are:

- a national food safety strategy that is developed in a cooperative way by the main stakeholders in the public administration and civil society including both the food-based industries and consumers, and that is adopted by the national government;
- a government-endorsed plan that outlines the main steps that must be taken for the implementation of the national food safety strategy, and who will have the responsibility for managing the process of change;
- specific proposals, developed on a rolling basis, for projects that will enable each step to be taken, with donor support where required.

One of the steps that must be taken, obviously, will be to re-organise the legal framework and the administrative arrangements within the public sector – for example, the specific roles and responsibilities of the ministries and agencies – so that they present the most efficient means of implementing the regulatory scheme. However the decisions on these aspects should clearly be subordinate and subsequent to the decision of what regulatory kinds of activities will be conducted, as set out in the national strategy.

5.3 Development of food law

During the mission we learned of the decision of the Government of Tajikistan to rapidly prepare and implement a new law on food safety to replace the Law on the Quality and Safety of Foodstuffs (2007). The imperative for this urgent initiative was the Government's desire to accede to the WTO in 2012, for which it was necessary to make suitable adjustments to the national legal framework. In his capacity as ITC National Consultant on SPS, Mr. Kosim Kurbonov had been given the task of preparing this new law, the draft of which had been recently transmitted by the Ministry of Health to the Ministry of Economic Development and Trade. The draft was based on the food safety law of the Ukraine, which had been developed with the assistance of experts from the USA and EU.

In effect the preparation of the new law pre-empts our view that revision of Tajikistan's food safety system should be preceded by proper consideration of the appropriate national policy and the concept of the most cost-effective regulatory scheme. However it remained timely to review how roles and responsibilities might be assigned to Ministries/agencies under the proposed new law.

5.4 Roundtable on “Organizational arrangements for food safety management in Tajikistan”

The roundtable was attended by some 27 representatives of the relevant ministries/agencies that have responsibilities in relation to food safety and other interested parties. The event program and a list of participants are provided at Annex B1 and B2. Mr. S. Nazriev, Deputy Minister of Economic Development and Trade, made an opening statement as did representatives of SECO and ITC.

After often lively discussion, participants agreed, inter alia, that:

- the principles for the organisation of a food safety system set out in the opening presentation (see Annex B3) were appropriate;
- the analysis set out in the matrix prepared under this project was accurate;
- there was very extensive duplication of functions and activities by the various agencies that implemented Tajikistan’s food safety system;
- reform of the system was essential in order to strengthen the efficiency and effectiveness of the system;
- it would be appropriate for each phase of the progression of food from primary production or import, through secondary processing, distribution, sale in bazaars or stores, sale in ready-to-eat form or export, to be regulated by a single agency:
 - so that, for example, only one food safety agency would be present at the border to inspect food imports (and probably this would be the Ministry of Agriculture since its officers would also need to be present to control animal/plant pest and disease risks)
- subject to the proviso that local government authorities would work at the direction of the appropriate central government agency to implement controls in smaller towns and villages;
- in relation to exports, regulatory interventions should be limited to only that which is required by the relevant authorities of the importing countries.

The logical consequence of this analysis is that the present very broad role of Tajikstandart would be reduced to managing the system for the formal adoption of draft food safety norms. There is no need in Tajikistan for an extensive system of certification of foods, implemented by Tajikstandart, if other expert agencies are effectively controlling imported foods, primary production and processing, and secondary processing.

These conclusions are commended to the consideration of those parties in Tajikistan who are engaged in the formulation of the new food safety law (see below).

5.5 Inter-Ministry meeting on new food law

Immediately after the roundtable discussion Mr. Nazriev convened an inter-Ministry meeting to initiate review by relevant agencies of the draft new food law prepared by Mr. Kosim Kurbonov. Essentially agencies were tasked to come back with their comments within a week, whereafter Mr. Kurbonov would prepare the final document. We were invited to observe the meeting but not called upon to make a substantive contribution to discussion. (We did comment that work was proceeding at a very rapid pace.) Nevertheless the conjunction of the timing of our work on the matrix and the roundtable with the preparation of a new law at the hands of ITC’s local consultant was obviously extremely fortunate and greatly magnifies the value of the ITC project in the aspect of SPS streamlining.

6. SENIOR EXECUTIVE SEMINAR ON “MANAGEMENT OF MODERN SPS-RELATED GOVERNMENT AGENCIES”

The high level seminar was held on 10 November, with 27 participants (see list at Annex C2) including the local SECO representative Ms. Malika Ibrohimova. Mr. Nazriev gave an opening statement and participated for a substantial part of the presentations and discussion. There were five

powerpoint presentations, as listed in the seminar program at Annex C1. A number of key background documents, in Russian, were distributed.

Participants engaged actively in discussion of the range of issues raised, and at the conclusion expressed appreciation for the relevance and value of the seminar.

The five presentations are available separately.

7. ACKNOWLEDGEMENTS

The Consultant takes this opportunity to express his appreciation for the work of Kosim Kurbonov, National Consultant on SPS, Saidmumin Kamolov, National Project Manager, and Nargiza Abjumajidova, National Programme Assistant.

Annex A: Matrix showing food safety responsibilities of relevant government agencies in Tajikistan

	MOH	MOA	Tojikstandard (TSD)	OTHER	COMMENTS
Primary production					
Setting official requirements (e.g. agricultural chemical residue limits)	According to Law No 49 "On sanitary and epidemiological safety of population" setting official requirements on pesticide residues in food is under responsibility of MoH and MoA. There is an Institute of Preventive Medicine within MoH which is responsible for development and application of MRLs for food.	There is a State department on usage of chemicals in agriculture and plant protection (SDCAPP) in MoA which is responsible for setting up official requirements on pesticide usage in agriculture. SVIS is responsible for development and setting MRLs in food of animal origin.	No specific activity.	According to Law "On production and safe handling of pesticides and agrochemicals" as of 22 April 2003 №1 and Resolution of the Government of Tajikistan "On establishment of the State Commission on Chemical Safety" № 92 as of 03.12.2003 the State Commission on Chemical Safety (SCCS) has mandate to coordinate activities of the relevant ministries and agencies in the pesticide management including setting official requirements.	There is complementary activities among ministries.
Codes of practice	SSESS and Institute of Preventive Medicine are involved in development and implementation of official requirements toward safe practice in agriculture mainly in pesticide usage. The code of practice should be developed in collaboration with MoA. For instance requirement toward application of the Personal Protective Equipment, regular medical clearances for staff.	State department on usage of chemicals in agriculture and plant protection of MoA is responsible for setting up requirements on code of practice toward pesticide and other agrochemicals usage in agriculture (e.g. norms of pesticide for plant treatment or per square meter or per hectare). Also the department should participate in development of the requirements toward safe practice.	No specific activity.	No specific activity in other ministries and agencies	No duplication among ministries and agencies but the involved ministries have no well developed legal base (guidelines, i.e so called sub law documents) for implementation of the required activities (e.g. the new law "On plant protection" has been recently circulated amongst ministries for deliberation) . There is also huge demand for capacity development of the ministries (qualified staff technical capacity).

<p>Control of agricultural inputs - fertilizer/feed/ seeds</p>	<p>No specific activity</p>	<p>State department on usage of chemicals in agriculture and plant protection is responsible for control of agricultural inputs i.e fertilizers in plants (e.g norms of fertilizers per hectare for cotton plant or for vegetables etc). The control of feed compounds, hormones and other feed additives in animal feed is under responsibility of SVIS.</p>	<p>No specific activity.</p>	<p>No specific activity in other ministries and agencies. According to the list of the goods subject of mandatory certification, TSD should certify Oil seeds, miscellaneous grains/ seeds including wheat; straw and fodder</p>	<p>No duplication among ministries and agencies but the control system represented by MoA services has no capacity to fulfill their responsibilities.</p>
<p>Agricultural chemical controls (registration, quality monitoring, import checks), etc.</p>	<p>SSESS has mandate to register imported chemicals regardless of the field of usage, conduct monitoring of usage and in case of needs should conduct quality control through testing (in case of request)</p>	<p>Agricultural chemical control is mainly under responsibility of State department on usage of chemicals in agriculture and plant protection. The list of chemicals allowed for usage in Tajikistan has to be developed in MoA. The list apart of the name has to include main chemical characteristics. The licensing and monitoring of usage should be carried out according to the list (e.g if certain pesticide which is not included in the list is submitted to the Commission on chemical safety for giving permission on import could not grant this permission until including in the list)</p>	<p>No specific activity.</p>	<p>State Commission on Chemical Safety coordinates ministries' activities on chemical control. Licensing of businesses on import of the agrochemicals is canceled since 2006.</p>	<p>The agrochemicals management system is not well developed and complicated due to poor ministries' capacity and no well developed legal base i.e. sub law documents (guidelines).</p>
<p>On-farm control, including sampling and testing</p>	<p>SSESS has mandate to conduct on farm control with sampling and testing mainly during harvest. For instance testing on pesticide residues or nitrates or inspection of dairy farms.</p>	<p>The State department on usage of chemicals in agriculture and plant protection of MoA is responsible for on-farm plant control (agrochemical fertilizers usage) and should take samples, for instance soil, plant fruits, vegetables etc for testing on agrichemical residues. SVIS is responsible for similar activity amongst animals. For instance registration of the new born, control of dairy farms and sampling and testing milk (on brucellosis), residues of veterinary drugs etc.</p>	<p>No specific activity.</p>	<p>No specific activity in other ministries and agencies.</p>	<p>There is possible duplication in the legal documents (sub law documents) between SVIS and SSESS in dairy farm control. But in practice due to poor capacity (on-farm inspection requires taking trip to distance places and field laboratory equipment or transportation equipment) duplication is not in place.</p>

<p>Zoonosis/ disease and pest surveillance</p>	<p>There is department of the very dangerous diseases within SSESS which is responsible for surveillance of zoonosis amongst humans and coordinate its activities with SVIS of MoA. The surveillance covers infectious diseases such as brucellosis, anthrax, Crime - Congo hemorrhagic fever etc.</p>	<p>Surveillance over zoonoses amongst animals is under mandate of SVIS. While legislation on veterinary is comprehensive and clear (the Law on veterinary has been updated recently) mainly passive epidemiological surveillance is in place due to multilateral challenges (lack of funds, capacity of laboratories, staff competency etc). Active surveillance covers mainly some zoonosis like brucellosis, FMD, AI and Tuberculosis which is supported by international organization's programmes. Also passive and active epidemiological surveillance are limited by inadequate IT and communication system, poor network with similar services of the neighboring countries, insufficient human and material resources, lack of compensation for farmers, poor control of animal movements, traceability system etc. Pest surveillance is under SSPPQI mandate and surveillance goes according to international requirements set by IPPC.</p>	<p>No specific activity.</p>	<p>No specific activity in other ministries and agencies.</p>	<p>No duplication between ministries but there is coordination of activities toward zoonosis. But due to poor capacity of the relevant ministries (MoH and MoA) the system needs improvement.</p>
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<p>Traceback, emergency response</p>	<p>It is under SSESS mandate and it does in practice in case of emergency. There is no well developed scheme or way to oversee supply chain within SSESS. The reasons are lack of competent staff and in general poor capacity. In case of emergency there is specific staff in the Food Hygiene department of SSESS responsible for response to certain emergency. But there is no proper system capable to trace forward or back on regular base, identify supply chain and risk. In case of emergency there is an experience to convene the National (regional, district) Anti Epidemic Commission (Task Force) that include representatives of relevant state bodies' and experts and usually chaired by Government officials (vice prime minister at national level).</p>	<p>While there are procedures in place to identify and trace animals and animal products as required for disease control and food safety purposes in accordance with certain international standards, but the services of MoA don't have capability to identify all animals or animal products and trace their history in practice. There are response procedures in case of food-borne outbreaks in SVIS. But due to poor capacities and lack of adequate financing (SVIS has limited access to extraordinary funds in case of emergency and no comprehensive compensation mechanism and lack of sufficient funds) the response is rather limited.</p>	<p>No specific activity.</p>	<p>No specific activity in other ministries and agencies.</p>	<p>No duplication between ministries but there is coordination of activities toward zoonosis. . The capacity of the relevant ministries (MoH and MoA) is poor and needs improvement</p>
<p>Control of genetically modified organisms</p>	<p>Institute of Preventive Medicine and SSESS of MoH is responsible for control of GMO but due to poor capacity (laboratory, qualified staff and lack of regular sampling and testing) there is no well developed system capable to provide control over GMO. Identification of GMO goes only through documents. There are also no guidelines and other documents on GMO management in SSESS and the Institute of Preventive Medicine.</p>	<p>The same as in SSESS the SVIS is responsible for GMO control but due to same issues there is no well developed control system. Identification of GMO goes only through documents. There are also no guidelines and regulations on GMO management in SVIS.</p>	<p>No specific activity</p>	<p>No specific activity in other ministries and agencies.</p>	<p>No duplication between ministries. The capacity of the relevant ministries (MoH and MoA) in identification and control of GMO is poor and needs improvement</p>

<p>Introduction of the international standards and regulations</p>	<p>There is rather huge need for development and harmonization of the international standards (Codex Alimentarius), guidelines etc in SSESS. Also there is no risk-based approach in control of food production so far.</p>	<p>Application of international standards and regulations is not adequate yet but it is under process i.e. ongoing (OIE, IPPC and Codex Alimentarius)</p>	<p>TSD according to intergovernmental (interstate) agreement of 11 pre Soviet countries TSD uses Soviet standards and Russian ones Each standard should be updated every 5 years and according to TSD representatives 41% of the existing interstate standards were harmonized with international ones.</p>	<p>No specific activity in other ministries and agencies.</p>	<p>No duplication. Implementation of the international standards is not adequate yet.</p>
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Food import					
<p>Setting official requirements (national food standards)</p>	<p>MoH. According to the law No 49 “On sanitary and epidemiological safety of population” and Government Resolution №139 of 31.03.2004 the MoH (SSESS and other institutions) in collaboration with other ministries and agencies participate in development of standards, regulations on imported and exported food and develop/adapt sanitary and epidemiological norms and rules on food safety for imported food inclusive. According to mentioned above law all imported and exported food are subject of sanitary and epidemiological confirmation on safety (compliance on chemical and bacteriological safety). For instance setting up MRLs for pesticides or implementation of requirements toward dietary food</p>	<p>MoA State Veterinary Inspection Service (SVIS) and State Service on Phytosanitary and Plant Quarantine Inspection (SSPPQI) have authority to participate in preparation and setting up of the official requirements and regulations. There is also resolution of SVIS of CIS countries on transportation and import of the products that sets official requirements toward certification of imported products of animal and plant origin</p>	<p>According to Law of the Republic of Tajikistan «On standardization» TSD has mandate to develop, approve, review and include changes in the state standards developed by technical committees (these have not been established yet) and other regulatory documents which are applicable to imported food as well. Most of used standards are Russian and/or were developed in Soviet Union time and that are subject to review every 5 years.</p>	<p>No specific activity in other ministries and agencies</p>	<p>No duplication in setting official requirements. The official requirements are similar for imported and domestic food. Every state body has right and mandate to participate in setting official requirement if there is relevant competency or activity within its regulation. TSD do not develop standards now and there is no well developed institution to do so in the country (but according to TSD representative, TSD approves standards and controls their implementation).</p>

<p>Pre-border inspection</p>	<p>No specific activity</p>	<p>This activity is mainly under SVIS and SSPPQI mandate (no such activity in TSD and SSESS or any private organization).</p>	<p>No specific activity</p>	<p>No specific activity in other ministries and agencies</p>	<p>The inspection at the places where certain food were originated or produced is not in place yet. The process usually includes verification of the information through internet or other sources on safety of the area where the certain food is originated from and will be imported. The owner should take permission from SVIS or SSPPQI to import certain amount of food (depending on sort of food) in advance and then at the borders the MoA services takes samples and tests food where give permission on import (certify) in case of compliance to the veterinary and phytosanitary requirement and then cargo could be transported to the destination.</p>
<p>At border inspection (document checks, food inspection and testing)</p>	<p>According to the Law № 49 “On sanitary and epidemiological safety of population” and Government resolution № 139 as of 31.03.2004 SSESS has mandate to control imported goods (food inclusive) and issue certificate of compliance to sanitary and hygiene norms on chemical and epidemiological safety. The process includes visual inspection, check of documents, sampling and testing.</p>	<p>Similar to SSESS, SVIS carry out controls of imported foods through certification of imported food of animal origin on compliance with the veterinary norms and standards. SSPPQI also controls imported foods through certification of imported food of plant origin on compliance to the phytosanitary norms and standards.</p>	<p>According to mandate stated in the Government Resolution No 486 as of 01 October 2008 “Order of the goods subject of the mandatory certification”, TSD checks documents, takes samples and tests imported food on compliance to existing standards (currently all standards are included in the temporary technical regulations) i.e. certifies imported food. Taking samples usually takes place in the border terminals (where TSD has its representatives) according to received information on the incoming goods</p>	<p>No specific activity in other ministries and agencies</p>	<p>There is overlapping is essential amongst TSD, SSESS and SVIS in taking samples and doing tests. Most of the tests are similar. All three bodies carry out identification of documents/check, take samples and send to the laboratory for testing on compliance to standards. The certification takes two days for perishable foods and no more 7 days for the other sort of foods. The government is going to implement «one window» approach for certification of imported and exported food products. All bodies need capacity development. TSD and SVIS have more developed sites at the borders (terminals) rather than SSESS. According to business owners the TSD is involved not only in control of imported food but also in all types of activities in the food safety framework.</p>

<p>Post-border registration of importers, traceability</p>	<p>All procedures on registration of imported food should take place within certification process at the terminals (the cargo should store at the terminals where all procedures should take place). Registration of the imported food that has been previously registered when imported for the first time differs from the first-time registration and based on simple registration according to documents and issued certificates. The certificate should be issued at the SSESS or its centers if cargo enters country through distant terminals. Due to poor capacity of the service, the mentioned scheme is not followed well. The traceability within country includes check of documents and certificates issued by the exported country. Due to absence of the well established recording and registration system there are no other activities in place and therefore further distribution of the imported food in most cases is unclear.</p>	<p>SVIS like SSESS should register (it differs from first time registration and includes simple registration of the food imported through issued certificates and documents) food of animal origin that is allowed for import to Tajikistan. The procedure usually takes place in the terminals; there is no post-border registration. The certificates are usually issued at the offices and at the terminals. The traceability is similar to SSESS</p>	<p>The registration usually goes through issued certificates. No traceability in place</p>	<p>No specific activity in other ministries and agencies</p>	<p>There is no post-border registration in Tajikistan and all process on registration of imported food goes through common procedure during certification at the borders. Traceability process includes only document checks and certificate of origin.</p>
<p>Post-border certification</p>	<p>No specific activity</p>	<p>No specific activity</p>	<p>No specific activity</p>	<p>No specific activity in other ministries and agencies</p>	<p>No certification of imported food after crossing borders (after at border checks). After certification consignments are usually transported to warehouses and then to market or directly to market.</p>

<p>Disposition of non-compliant consignments</p>	<p>Similar to SVIS activity</p>	<p>According to the Law of Tajikistan on “Food quality and safety”, the non-compliant consignments should be re-exported by the owner within 10 days and in case of non response within 10 days the competent bodies have authority to apply for court (in case of disputes) or create commission (with involvement of relevant bodies and exporter) and through court or commission resolution within their competency and using laws of RT : “On Veterinary”, “On Plant Quarantine” etc take following measures: 1 Destroy , 2 Reprocessing 3. Return (re export), 4 Quarantine 5.Issue penalties for non-compliance, 6. Fumigation. Decision on application of appropriate measure should be taken through mandatory involvement of the Chamber of the Trade and Commerce of Tajikistan</p>	<p>Similar to SVIS activity and uses Procedures on examination, destruction or further processing of food production, goods and items not suitable for use 17/04/2006 #56 f/a .</p>	<p>No specific activity in other ministries and agencies</p>	<p>No overlapping of activities amongst bodies. According to the Law of Tajikistan on “Food quality and safety”, the non-compliant consignments should be re-exported by the owner within 10 days and in case of non response within 10 days the competent bodies (SSESS, SVIC, SSPPQI and TSD) has a right to apply for court (in case of disputes) or create commission (with involvement of relevant bodies and exporter) and through court or commission resolution within their competency and using laws of RT : “On Providing Sanitary and Epidemiological Safety of Population”, “On Consumer Protection”, “On Standardization”, “On Veterinary”, “On Plant Quarantine” etc take following measures: 1 Destroy , 2 Reprocessing 3. Return (re export), 4 Quarantine 5.Issue penalties for non-compliance, 6. Fumigation. Decision on application of appropriate measure should be taken through mandatory involvement of the Chamber of Trade and Commerce of Tajikistan</p>
<p>Emergency response</p>	<p>SSESS according to law No 49 «On sanitary and epidemiological safety of population» must respond to emergency situation (food-borne diseases or outbreaks) and has mandate to take certain measures toward imported food suspected as the source of threat for population health. Also SSESS should carry out preventive measures amongst population to stop further transmission of diseases basing on International Health Regulation..</p>	<p>SVIS also has the same mandate as SSESS in case if the source of emergency is food of animal origin and conducts activities in case of emergency, basing on “Law on veterinary” and OIE regulations. The same in SSPPQI in case of emergency caused by pests or quarantine plants but this service apart of the Law on plant quarantine bases on IPPC regulations as well.</p>	<p>TSD has the same mandate toward implementation measures described in the disposition of non-compliant consignments which could be taken in case of emergency, regardless the sort of food products. For instance recall of expired or non-compliant consignments from market</p>	<p>No specific activity in other ministries and agencies</p>	<p>There is no duplication of activities amongst bodies. All bodies have mandate to respond to emergency. There is no difference between measures that could be taken by state bodies against imported food. The measures at the border level have to be taken in presence of the Chamber of Trade and Commerce representative.</p>

Registration of food/first-time clearance	According to law «On food quality and safety» the first time imported food is subject of official registration in the MoH. The procedure includes registration through documents, sampling and testing on conformity to existing standards and sanitary norms.	SVIS has to officially register first-time imported food of animal origin through documents, sampling and testing. Registration of other food of animal origin usually goes through issued certificates.	According to TSD officials there is no official registration of the first-time imported food in TSD. TSD conducts only common registration of the imported food through issued certificates.	No specific activity in other ministries and agencies	The new food product (first-time imported) is subject to mandatory registration in SSESS and SVIS. Re-registration of imported food is not in place and prohibited by Law "On food quality and safety".
Introduction of international standards and regulations				No specific activity in other ministries and agencies	Very poor for all bodies. For instance TSD has just started the development of the temporary technical regulations. Codex Alimentarius standards are not adopted so far. TSD uses mainly Soviet standards and Russian ones. Some intergovernmental standards were adopted through agreement of 11 post-Soviet countries. The same in SSESS they use Soviet or Russian guidelines and sanitary norms and rules. SVIS includes OIE guidelines and regulations but this is still weak. SSPPQI has included IPPC regulations.

Primary processing

Setting official requirements	SSESS has mandate to develop and implement official requirements in primary processing which includes for instance food hygiene practice using sanitary and hygiene norms and rules.	SVIS has also mandate to develop and implement official requirements in primary processing of food of animal origin using sanitary and veterinary norms and rules.	TSD has mandate to participate in development of official standards (requirements) toward primary processing and has authority to approve ones. According to TSD representatives such standards have not been developed so far while some standards present some requirements toward primary processing and most enterprises' activities include both primary and secondary processing in Tajikistan	No specific activity in other ministries and agencies	All bodies (TSD, SSESS, SVIS) have mandate to set requirements on primary processing.
Codes of practice	The laws No 49 "On sanitary and epidemiological safety of population», "On food quality	Similar to SSESS SVIS according to Law No 624 "On veterinary" and State resolution	TSD has mandate to participate in development of official standards	No specific activity in other ministries and	All bodies (TSD, SSESS, SVIS) have mandate to set requirements on codes of practice. Most requirements are in the

	<p>and safety" delegates main responsibilities on food safety to MoH (SSESS) including primary processing. Most of them include hygienic requirements on code of practice and prevention of food contamination. These requirements are included in the sanitary and epidemiological norms and rules, standards and technical conditions and cover as well secondary processing as the food production as most enterprises include both primary and secondary processing. For instance salt production includes keeping the salty water in the basins, natural evaporation, iodization and packing within an enterprise.</p>	<p>No 182 as of 03.04.2007 as of 29.12.2010 has mandate to set requirements on codes of practice for all food processing stages of food (raw food) of animal origin.</p>	<p>(requirements) toward primary processing and has authority to approve ones. According to TSD representatives such standards have not been developed so far while some standards present requirements toward primary processing and most enterprises activities include both primary and secondary processing in Tajikistan</p>	<p>agencies</p>	<p>standards, sanitary or veterinary norms and cover both primary and secondary processing, as most enterprises' activities on food production include both primary and secondary processing. There is also lack of sub law papers i.e. guidelines on control or inspection processes toward which the control or inspection should go. The bodies ask for following sanitary and hygienic rules while inspecting food processing using specifically Russian scientific or technical literature (sometimes no officially approved guidelines). Also there are no exact notes in law on "Food safety and quality", or in other laws about TSD mandate in food safety. There are several common articles mentioning responsibilities of Government bodies in food safety provision. No exact delegation of authorities has created ground for uncertainty of the mandates. Therefore each body is free to get its own responsibility (as much as it is capable) while developing its regulations. There should be mention about advocacy skills and may be influence.</p>
<p>Approval of premises</p>	<p>SSESS has mandate to approve the conformity of the premises to the food processing requirement while commissioning (before operation) and during its operation when conducting inspection. SSESS uses the Soviet time or adapted Russian sanitary norms and rules during inspection or assessment.</p>	<p>The legislation gives mandate to SVIS to assess against veterinary norms and approve premises where animal food is processed.</p>	<p>TSD also does assessment of the premises where primary and secondary processing take place, during commissioning or inspection using Soviet time or adapted Russian standards and issues certificate of conformity (so called testimony) of readiness of the enterprise for the production of specific products</p>	<p>No specific activity in other ministries and agencies</p>	<p>MoH, MoA services and TSD representatives assess the premises while commissioning (before operation) or inspect the enterprises during activity. Overlapping is between TSD and SSESS as both bodies inspect against similar requirements (premises' compliance to the processing, number of premises needed for certain food processing, level of humidity in premises etc) as these requirements are stated in the used guidelines, sanitary norms and rules and standards.</p>

<p>Inspection of premises/export inspection</p>	<p>SSESS has mandate to inspect (and do in practice) premises where the primary production takes place and also has for mandate to inspect exported food compliance to the sanitary norms and regulations using the same sources as mentioned above.</p>	<p>SVIS also inspects premises where processing of the food of animal origin takes place (SSPPQI inspects the premises and exported food of plant origin toward phytosanitary safety). Inspection of exported food of animal and plant origin toward veterinary and phytosanitary norms is also under their mandate. They use partially Soviet time and OIE and IPPC standards and regulations. Also have a look at border control column in the Import section.</p>	<p>TSD has mandate to inspect premises where primary processing takes place using above mentioned sources. Exported food is subject of mandatory certification in TSD</p>	<p>No specific activity in other ministries and agencies</p>	<p>Overlapping is in placing similar requirements during inspection as mentioned above.</p>
<p>Sampling and testing</p>	<p>SSESS has mandate (and does in practice) to take samples and test imported food. For instance on pesticide MRLs or nitrates. This activity is more developed at the central/national level (for instance in Dushanbe) but is poor at regional level.</p>	<p>Similar to SSESS, SVIS has the same mandate toward food of animal origin and live animals. For instance pre-slaughtering examination of animals, taking meat, meat product, milk and dairy product samples and testing on infection with helminthes eggs or zoonoses in the enterprises producing meat or dairy products or in private farms. This activity is rather poor in distant areas.</p>	<p>TSD has mandate to take samples during primary processing and carry out tests similar to SVIS and SSESS. For instance testing milk on microbiological contamination in the food enterprises.</p>	<p>No specific activity in other ministries and agencies</p>	<p>The reason for taking samples and testing is compliance to standards, sanitary, veterinary and phytosanitary norms. But in practice the quality tests are under consideration. Some of tests (bacteriological) overlap in the services.</p>
<p>Licensing of businesses</p>	<p>SSESS certifies (carries out so called sanitary and epidemiological expertise) business that includes sanitary and hygiene requirements on food processing. The procedure includes inspection and assessment of the food processing and application of the sanitary and hygiene norms and rules.</p>	<p>The same as SSESS but toward enterprises which produce food of animal origin</p>	<p>TSD in practice carries out assessment of enterprises and approves (issues so called testimony) of readiness of enterprises for the production of specific products where enterprises business/activity is subject of assessment as well.</p>	<p>No specific activity in other ministries and agencies</p>	<p>There is no overlapping in the bodies' activities while some duplication is in placing similar requirements during assessment.</p>

<p>Auditing of quality systems</p>	<p>There is no independent inspection (alternative to official inspection of food and food establishments) in practice in the MoH services (in the SSESS)</p>	<p>The same as in MoH</p>	<p>The same as in MoH</p>	<p>No specific activity in other ministries and agencies</p>	<p>There is not yet independent inspection (alternative to official inspection of foods and food establishments) in practice in TSD, MoH and MoA services. Only few enterprises have introduced ISO 22000 recently and the quality systems of two private enterprises which are exporting food (juice and beverages) were assessed by the international experts. Two TSD laboratories have been recently granted international accreditation through ITC support. The state bodies are not yet ready to accept independent auditing of quality systems as an alternative to official one due to no legislative base.</p>
<p>Traceability</p>	<p>There is a food hygiene department within SSESS which carries out activity on traceability within the country. The same department is in regional and district levels/centers. The traceability system is usually based on identification and checking documents. However due to inadequate registration system and poor capacity of the regional and district centers trace back and forward activity is challenging</p>	<p>Traceability procedure is well developed in the SVIS regulation but the service is not capable to fulfill this activity in practice. The traceability mainly includes only document checks where product's origin is identified. No well established record keeping in food establishments (for instance abattoirs) that pose serious problem in identification of animals and eventually in emergency response.</p>	<p>TSD also has its offices at the regional level but not at district levels. Similar to other state bodies there is no well established traceability system at regional and district levels and the activity includes identification and checking documents. No well established registration system and therefore surveillance over supply chain is challenging.</p>	<p>No specific activity in other ministries and agencies</p>	<p>In general there are currently no traceability system «from farm to table" in place in MoH, MoA and TSD. While the traceability is developed in the regulation of the MoA services but due to poor capacity and lack of finance the fulfillment of activities (registration, recording, surveillance over supply chain) are not adequate.</p>

Secondary processing

<p>Setting official requirements</p>	<p>SSESS has mandate to develop and implement official requirements in Secondary processing which includes for instance food hygiene practice which formulated in sanitary and hygiene norms and rules.</p>	<p>SVIS has also mandate to develop and implement official requirements in Secondary processing food of animal origin that is formulated in sanitary and veterinary norms and rules.</p>	<p>TSD has mandate to participate in development of official standards (requirements) toward secondary processing and has authority to approve and control their implementation. Most standards present requirements toward primary and secondary processing and most</p>	<p>No specific activity in other ministries and agencies</p>	<p>All bodies (TSD, SSESS, SVIS) have mandate to set requirements on secondary processing.</p>
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			enterprises' activity in Tajikistan include both primary and secondary processing		
Codes of practice	The same as in the primary processing	Similar to the SSESS the SVIS according to Law No 624 "On veterinary" and State resolution No 182 as of 03.04.2007 as of 29.12.2010 has mandate to set requirements on code of practice for all food processing stages of food (raw food) animal origin.	TSD has mandate to participate in development of official standards (requirements) toward secondary processing and has authority to approve and control their implementation. Most standards present some requirements toward primary and secondary processing and most enterprises' activity in Tajikistan include both primary and secondary processing	No specific activity in other ministries and agencies	Most requirements that are in the standards or sanitary or veterinary norms cover both primary and secondary processing and also most enterprises' activity in Tajikistan include both primary and secondary processing
Approval of premises	The same as in primary processing and usually carried out with assessment of primary processing	The legislation gives mandate to SVIS to assess against veterinary norms and approve premises where animal food is processed (secondary processing inclusive)	TSD does assessment of the premises where primary and secondary processing takes place during inspection or assessment of enterprises' readiness for production of the specific products (basing on Soviet time or adapted Russian standards)	No specific activity in other ministries and agencies	MoH, MoA services and TSD representatives assess the premises while commissioning (before operation) or inspect the enterprises during activity. Overlapping is between TSD and SSESS as both bodies inspect against similar requirements (premises' compliance to the processing, number of premises needed for certain food processing, level of humidity in premises etc) as these requirements are stated in the used guidelines, sanitary norms and rules and standards.
Inspection of premises	The same as in the primary processing	SVIS also inspects premises where processing of the food of animal origin takes places (SSPPQI inspects the premises and exported food of plant origin toward phytosanitary safety). Inspection of exported food of animal and plant origin toward veterinary and phytosanitary norms is also under their mandate. They use partially Soviet time and OIE and IPPC	TSD has mandate to inspect premises where secondary processing takes place using above mentioned sources. Exported food is subject of certification in TSD.	No specific activity in other ministries and agencies	Overlapping is in inspection against similar requirements as mentioned in the above column.

		standards and regulations. Also have a look at border control column in the Import section.			
Sampling/testing of ingredients and/or products	SSESS has mandate (and do in practice) to take samples and test imported food. For instance on pesticide MRLs or nitrates. This activity mainly is more developed in the central/national level (for instance in Dushanbe) but is poor in the regional and district levels.	Similar to SSESS, SVIS has the same mandate toward food of animal origin and live animals. For instance pre slaughtering examination, taking meat, meat product, milk and dairy product samples and testing on infection with helminthes eggs or zoonoses in the enterprises producing meat or diary products or in private farms. This activity is rather poor in distant areas.	TSD also has mandate to take samples during secondary processing and carry out similar to SVIS and SSESS tests. For instance testing milk on microbiological contamination.	No specific activity in other ministries and agencies	The reason for taking samples and testing is compliance to standards, sanitary, veterinary and phytosanitary norms. But in practice the quality tests are under consideration. Some tests (bacteriological) overlap in the services.
Licensing of businesses	SSESS certifies (carries out so called sanitary and epidemiological expertise) business that includes sanitary and hygiene requirements on food processing. The procedure includes inspection and assessment of the food processing and application of the sanitary and hygiene norms and rules.	The same as SSESS but toward enterprises which produce food of animal origin	TSD does not certify business in the secondary production but in practice inspects the business/activity. Also TSD issues certificate of conformity (so called testimony) on readiness of the enterprise for the production of specific products where it assesses business/activity as well.	No specific activity in other ministries and agencies	There is no overlapping in the bodies' activities while some duplication is in placing similar requirements during assessment.
Auditing of quality systems	The same as in the primary processing, there is no independent inspection (alternative to official inspection of food and food establishments) in practice in the MoH services (in the SSESS)	The same as in MoH	The same as in MoH	No specific activity in other ministries and agencies	There is not yet independent inspection (alternative to official inspection of foods and food establishments) in practice in TSD, MoH and MoA services. Only few enterprises have introduced ISO 22000 recently and the quality systems of two private enterprises which are exporting food (juice and beverages) were assessed by the international experts. Two TSD laboratories have been recently granted international accreditation through ITC support. The state bodies are not yet ready to accept independent auditing of quality system as alternative to official one due to no legislative base.

Traceability	The same as in the primary processing	Traceability procedure is well developed in the SVIS regulation but the service is not capable to fulfill this activity in practice. The traceability mainly includes only document checks where product's origin is identified. No well established record keeping in food establishments (for instance abattoirs) that pose serious problem in identification of animals and eventually in emergency response.	The same as in the primary processing	No specific activity in other ministries and agencies	In general there are currently no traceability system «from farm to table" in place in MoH, MoA and TSD. While the traceability is developed in the regulation of the MoA services but due to poor capacity and lack of finance the fulfillment of activities (registration, recording, surveillance over supply chain) are not adequate.
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Transport, storage and distribution

Setting official requirements	This activity is mainly under MoH (SSESS) mandate. The SSESS is responsible to set up official requirements on food transportation, storage and distribution	SVIC and SSPPQI have mandate and do in practice set up and implement official requirements toward food of animal and plant origin transportation and storage. For instance requirements toward containers and storage and transportation of meat and meat products (temperature, humidity etc).	TSD has mandate to develop/approve standards that have requirements toward storage and transportation conditions.(most standards are Soviet time or/and adapted Russian ones)	No specific activity in other ministries and agencies	No duplication was found among state bodies. There is more complementary activities rather than overlapping.
Codes of practice	SSESS has mandate to set up requirements for codes of practice. For instance mandatory annual medical clearance for staff engaged in food transportation, certification (so called passportization/ issue passport) of the transport (vehicles) engaged in transportation.	The same as SSESS but toward products of animal origin	The same as above	No specific activity in other ministries and agencies	There are complementary activities rather than overlapping. Most requirements are based on the Soviet time or Russian standards, sanitary and veterinary norms and rules.
Approval of premises	During inspection or commissioning of the food enterprisers SSES checks also requirements toward premises and gives general approval (so called sanitary and	The same as in SSESS but toward food of animal origin	TSD also gives conclusion on conformity of premises toward existed requirements in the standards.	No specific activity in other ministries and agencies	Licensing is not in practice but there is practice to approve practice/services where the bodies along with other activities and establishments assess premises as well which will be considered in general assessment and

	epidemiological conclusion). The source of requirements is the same as mentioned above				finally for approval. It seems there is duplication between TSD and SSESS as the requirements are similar and have the same sources as mentioned above
Inspection of premises	SSESS has mandate and do in practice assessment of the premises during inspection. The requirements are based on the same sources (Soveat time and Russian norms, standards, and rules)	The same as in SSESS but toward food of animal origin	The same as mentioned in SSESS and SVIS and requirements have the same source as mentioned above	No specific activity in other ministries and agencies	The inspection of the premises goes according to rules based on the same sources as mentioned above. Some duplication exist between SSESS and TSD toward requirements set during inspection
Licensing and/or inspection of food transport vehicles	There is no licensing of the transport in practice in Tajikistan. SSESS has mandate and does in practice regular inspection of the vehicles engaged in food transportation. The procedure includes regular (annual) medical clearance for drivers and inspection and certification (giving sanitary and epidemiological conclusion/permission) on conformity of the vehicle to sanitary norms and rules. The requirements are based on the same sources as mentioned in the above sections.	No specific activity	No specific activity	No specific activity in other ministries and agencies	No licensing of vehicles in practice. Also no duplication was found amongst ministries and TSD. It is only under SSESS mandate to give permission (certificate) on compliance of the vehicles dealing with food transportation to the sanitary norms and rules.
Licensing of businesses	SSESS has mandate and has to approve (issue conclusion/permission) food transportation and storage businesses. The procedure includes assessment of capability of business owners to follow sanitary and hygiene norms and rules during business administration. The requirements are based on the same sources as mentioned above.	The same as SSESS for enterprises engaged in production of food of animal origin	The same as SSESS and the requirements are based on above mentioned sources.	No specific activity in other ministries and agencies	Licensing is not in practice but there is a practice to (give permission) certify business where the MoA, MoH and TSD sets requirements regarding code of practice, staff etc. Again the requirements have the same sources as mentioned above. There is duplication in examination of the requirements among state bodies.

Traceability	The traceability is based on checking documents and registration which goes through the registered/issued certificates (conclusions) and through registration that existed in the enterprises (if the record keeping is in place) where food stored or transported.	The same as SSESS for alive animals and food of animal origin	The same as in SSESS	No specific activity in other ministries and agencies	No traceability except for document checks. As has been mentioned in other sections traceability is poor mainly due to absence of the mandatory requirements on record keeping toward transported or distributed food.
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Marketing

Setting official requirements	SSESS has mandate to set up and implement official requirements toward wholesome and retail food trade. The requirements are based on Soviet time and adopted Russian sanitary and hygiene norms and rules. For instance establishing “sanitary day” in markets “Bazars” where market should be closed for general/spring cleaning.	SVIS develops and sets up official requirements in the large markets «Bazars», as the provision of the food safety there is under their mandate and moreover the SVIS keeps veterinary laboratories there.	As has been mentioned TSD is government body which develops, approves and controls standards implementation in Tajikistan and there are some requirements toward food sale in markets.	No specific activity in other ministries and agencies	No duplication found amongst state bodies in setting up the official requirements. There is complementary activity rather than overlapping.
Codes of practice	As mentioned above SSESS sets up official requirements for markets that also cover code of practice. For instance code of individual hygiene, regular medical clearance for staff,.	SVIS develops and sets up official requirements in the large markets «Bazars» that cover also codes of practice. The requirements are similar to SSESS	The approved and controlled by TSD standards covers codes of practice in markets as well. For instance the standard (GOST)1066-2005, ST RT 1037-2001 sets requirements on retails in the large and small markets.	No specific activity in other ministries and agencies	There is no duplication in setting up requirements toward codes of practice but there is some similarity in requirements. For instance hygienic practices.
Licensing of establishments	There is no licensing of establishments in practice. The SSESS has mandate to approve (give conclusion /permission) establishments on compliance to the sanitary and hygienic requirements. There is no separate approval procedure for premises etc and the assessment usually takes place	It is mandatory for owners to get approval of their establishments while commencing operation in big markets by SVIS or SSPQI depending on their type of establishment and designation (for example sale or storage of the food animal or plant origin)	According to Government Resolution of RT № 486 of 01 10 2008, the list/types of business and services that are subject to certification for their services and during this procedure premises and establishments are subject of assessment on	No specific activity in other ministries and agencies	There are two kinds of the state sanitary surveillance over food establishments in SSESS (for instance markets). The first is regular surveillance which runs according to plan and includes regular inspections of food establishments. Second is preventive sanitary surveillance that includes examination of the architectural papers and assessment of

	<p>during commissioning of market where the SSESS authorities assess markets generally (premises needed for activity, code of practice, storage condition etc)</p>		<p>compliance to the standards and sanitary norms and rules as well.</p>	<p>the allocated land for construction. In case of reconstruction the assessment in most cases covers reexamination of the architectural papers and adaptation of the construction to the requirements posed by food production technology/process. Then the construction activities are subject of inspection twice in a year to monitor and assess construction to the planned ones (architectural drawings). After completion of construction the local government should establish commission comprising relevant bodies like state, local governance, architecture department, fire inspection, SSESS etc. The establishment could start its operation when commission approves that the establishment meets all requirements (when all representatives sign the commission document). SSESS according to its mandate is involved in all types of commissioning of establishments, markets inclusive. SVIS is involved in the commissioning when there is construction of bazars or smaller markets that belong to the large market. TSD usually does not participate in the commissioning but taking its permission for owners is mandatory as well to have a look at the licensing business section (according to Government resolution № 486 as of 01 10 2008 the market service is subject of certification) therefore there appears to be overlapping in placing requirements between TSD and SSESS and SVIS (regarding markets)</p>
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<p>Licensing of businesses (small, large)</p>	<p>It is mandatory for owners to certify their business at SSESS in advance of commencement of activities. Permission usually issued for a year.</p>	<p>It is mandatory for owners to certify their business in advance to commence activities at SVIS if the activity covers production of food of animal origin. For instance meat, milk and their products at large and small markets i.e. bazars.</p>	<p>According to Government resolution № 486 as of 01.10.2008 range of works and services subject of certification oblige owners to certify their business/services at TSD. There is also regular inspection twice a year but according to business owners the frequency is more.</p>	<p>No specific activity in other ministries and agencies</p>	<p>In general it is mandatory for owners to certify their business in advance to commence activities at SSESS, TSD (SVIS in case of large or small markets i.e. Bazars) and recertify regularly (annually).</p>
<p>Inspection of markets (formal, informal), shops, etc.</p>	<p>SSESS has mandate and inspects large and small markets in practice. Inspection covers all food establishments (shops, retailers, canteens etc) within markets. Usually inspections are regular and based on annual plans, but also according to needs that occurs for example in case of consumer complaints or food born diseases or outbreaks (emergency)</p>	<p>It is under SVIS mandate to provide food safety in the large and small markets «Bazars». The small markets are usually the branch of the large ones and the SVIS staff and laboratories of the large ones are responsible for implementation of food safety activities there. The SVIS staff at the markets are responsible for laboratory control and safety of food animal and plant origin. For instance testing meat, milk and dairy products on brucellosis, testing meat on helminthes eggs, testing vegetables on nitrates and pesticide residues</p>	<p>According to the Government resolution № 486 as of 01.10.2008 and law «On consumer's right protection» TSD inspects large and small markets on regular base. The procedure includes an examination of the expiry dates, storage and sale condition and presence of certificates etc. TSD uses Soviet time or adapted Russian regulations, standards and sanitary norms and rules.</p>	<p>There is a corporation "Khurocvari" of the MoEI which shared responsibility in inspection and certification enterprises, shops and markets dealing with production and wholesale and retail of alcohol drinks/beverages. According to business owners the corporation representatives in some cases inspect shops and markets while checking presence of the certificates.</p>	<p>There is duplication between SSESS and TSD and among all bodies (TSD, SSESS and SVIS) in the large markets. Overlapping is in inspection toward sanitary norms and rules, standards as most requirements are similar</p>
<p>Sampling/testing of foods</p>	<p>SSESS should take samples and test food in markets on regular base but due to lack of capacity of the centers this activity is rather poor at district level. The sampling in the large markets usually takes place while SSESS conducts quality control of the SVIS laboratories or in case of emergency or consumer complaint.</p>	<p>SVIS through its laboratories takes samples and tests food in regular basis in large and small markets. Some samples are sent to central laboratories for testing (if it requires complex tests). For example samples of milk and milk products on brucellosis. Due to lack of centers' capacity this activity is rather poor at district level</p>	<p>TSD does not take samples on a regular basis. But during inspection of markets it takes samples and tests suspected food. Also TSD carries out such activity in case of consumer complaint.</p>	<p>No specific activity in other ministries and agencies</p>	<p>Duplication is in testing as most tests are based on outdated methods and approaches and are similar. For instance tests on microbiological contamination.</p>

Food export					
Official requirements imposed by exporting country	No specific activity	No specific activity	No specific activity	No specific activity in other ministries and agencies	Such activity was not found
Competent Authority export certification	<p>There is a department on certification and accreditation in SSESS which engaged with sanitary and epidemiological assessment and certification (giving sanitary and epidemiological conclusion) of imported and exported food. The experience where inspection could be done by: private contractor, officials sent from the importing country or by the designated competent authorities of the exporting country, does not exist in SSESS.</p>	<p>Competent Authority export certification experience is mainly in SVIC, SSPPQI. For instance for exporting dry fruits to Russia the exporter should apply to SSPPQI in Russia for getting permission for import of certain dry fruits. After getting permission issued by Russian authorized body exporter should apply to SSPPQI in Tajikistan to get certificate for export. On this basis the SSPPQI certifies dry fruit in Tajikistan (in this case exporting country). The same procedure applies to live animals in SVIS</p>	<p>TSD has also department on certification which deals with certification of imported and exported food products. The experience where inspection could be done by: private contractor, officials sent from the importing country or by the designated competent authorities of the exporting country, does not exist in practice at TSD.</p>	<p>It is mandatory to take certificate of origin form National Commerce and Trade Chamber which is only authorized body for that in Tajikistan Two private enterprisers have introduced ISO 22000 via international certification body DNV Norway and ITC support.</p>	<p>There is no private agency or organization rendering inspection or certification service. All certification procedures are carried out by designated official (government) competent authorities like SVIS, SSPPQI, TSD and SSESS. There was no inspection done by officials sent from the importing country or private body so far. It seems that the reason lies in the lack of export volume (that mainly includes dry fruits, hazelnuts, pistachios, almonds, juices, fruits and vegetables) to a few countries that in most cases are Afghanistan, Turkey, Kazakhstan, Russia. Have a look at the Auditing of quality systems in the primary and secondary processing sections.</p>
Inspection and/or sampling/testing	<p>There is a department on certification and accreditation in SSESS which engaged with sanitary and epidemiological assessment and certification (giving sanitary and epidemiological conclusion) of imported and exported food. The procedure includes sampling and testing and inspection of food to be exported. Whole process is carried out by SSESS within the country. There is no other way of inspection in SSESS (there has been no request made by imported countries so far).</p>	<p>As it is mentioned above and the process includes inspection, sampling and testing as well</p>	<p>As it is mentioned above. All exported food are subject of certification in TSD and process is carried out by TSD within the country. There is no other way of inspection in TSD.</p>		<p>Have a look at above section, the same activities regarding inspection where sampling and testing is mandatory as well.</p>

<p>Licensing/ certification of premises</p>	<p>No specific activity on certification or licensing of premises. SSESS certifies (issues sanitary and epidemiological conclusion) the enterprises' premises where food processing takes place while commissioning and regularly once in a year (have a look at similar activity in other sections) including premises where exported food is processed. The experience where Inspection could be done by: private contractor, officials sent from the importing country or by the designated competent authorities of the exporting country, was not in SSESS so far (there has been request made by imported countries so far)..</p>	<p>Such experience is in SVIC and SPPQI activities. Have a look at the Competent Authority export certification section.</p>	<p>No specific activities.</p>	<p>No specific activity in other ministries and agencies</p>	<p>The same as in Competent Authority export certification section. But there is no licensing of premises in practice. Certification of premises goes only through official (government) bodies. And the procedure takes place in case of request from importing country. For instance in the case of wool SVIS should certify the wool which was taken from animals in the zoonoses free area and processed in good conditions/premises. There was no certification done by private contractor, officials sent from the importing country or by the designated competent authorities of the exporting country in practice so far.</p>
<p>Traceability</p>	<p>Traceability is based on registration of the exported food during certification (sanitary and epidemiological assessment and issuing certificate of conformity). How exporters register the exported food is unclear as no clear answer has been given. This means that there is no official registration requirements/obligations on record keeping at the enterprisers in practice therefore traceability is challenging</p>	<p>Traceability is clearly developed in the regulations but is mainly based on registration of the certificates. No proper record keeping in enterprises dealing with food of animal origin. Due to undeveloped registration system the traceability of live animals and food of animal origin is inadequate. Have a look at the same activity in other sections as well.</p>	<p>The same is in MoH</p>	<p>No specific activity in other ministries and agencies</p>	<p>Trace back system is mainly based on registration of the documents during certification and inspection. (for instance giving certificate of origin by Chamber of Trade and Commerce). The traceability is clearly stated in the SVIS regulation but implementation is poor due to lack of capacity. Have a look at traceability in other sections.</p>

Consumer sector

<p>Setting labelling Rules</p>	<p>No specific activities. Have a look at other sections as well.</p>	<p>SVIS sets requirements toward labeling in the markets - Bazars. For instance labeling meat (placing marks/stamps on meat in the markets) Have a</p>	<p>This is TSD responsibility to set official labeling rules according to Standards (GOSTs). The TSD representatives mentioned</p>	<p>No specific activity in other ministries and agencies</p>	<p>This is TSD responsibilities to set official labeling rules according to Standards (GOSTs). MoH and MoA should participate in setting requirements if the label comprises information about food safety as well. There was no duplication of</p>
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		look at marketing sections as well.	also the technical regulations which are not yet in place, but should be developed and implemented (to substitute standards) according to the law "On Technical Regulation" and "On Standardization" standards are not mandatory but STD included all standards in so called temporary technical regulations that gives standards mandatory nature. And it will be replaced by technical regulations within 7 years.		activities amongst bodies, but according to TSD plan the process of transformation of temporary to permanent technical regulations will take 7 years which could be an obstacle for WTO accession.
Codes of practice	SSESS has mandate to set up official requirements called sanitary norms and rules in catering and trade.	SVIC has mandate to set up official requirements called sanitary and veterinary norms and rules for establishments dealing with animal food (abattoirs and shops where meat and raw food of animal origin are sold), large and small markets.	TSD has mandate to develop, participate in development and approve standards and technical regulations that set official requirements in the catering trade. Moreover catering service is subject to certification in TSD	No specific activity in other ministries and agencies.	SVIS, SSESS and TSD have mandate to set up official requirements in codes of practice in the consumer sector. Bodies use Soviet time, Russian and interstate sanitary norms and rules and standards in setting requirements in codes of practice.
Setting official requirements	SSESS sets up official requirements on catering and trade service which include code of practice and requirements toward premises and food preparation technology. For instance requirements on personal hygiene, washing utensils and equipment, size of premises etc.	The same as SSESS in the large and small markets and shops where meat and raw food of animal origin are sold.	TSD is basing on law «On consumer right protection» (while there is no exact delegation of the TSD responsibilities) and Government resolution No 209 as of 06.06.2005 sets official requirements in catering and trade service i.e shops, restaurants, canteens etc (regardless of size). Moreover the catering and food trade service .are subject to certification in TSD.	MoEI has authority to set up official requirements in production of alcohol drinks	There is no exact duplication while there is some similarity in requirements. The SVIS requirements cover mainly large and small markets (as these markets are branches of large ones) and shops where food of animal origin is sold but SSESS and TSD requirements cover all consumer sector (catering trade and service, shops etc) institution.
Tourist food/restaurants	SSESS according to Law No 49 "On sanitary and epidemiological safety of population" has mandate	SVIS has mandate and controls catering trade at the large and small markets and in	TSD is fully involved in this activity while again there is no clear delegation of the	MoEI has mandate to control alcohol	Duplication exists between TSD and SSESS in inspection of the catering trade against the similar requirements (food preparation, code of

control	to control catering trade establishments. This is one of the main activities of the service but there are few guidelines that set official requirements in the food safety field and therefore SSESS uses Soviet time and Russian regulations (guidelines, standards) to accomplish its responsibilities.	the small shops selling food of animal origin.	responsibilities in the laws «On consumer right protection» and "Food quality and safety" that TSD bases during inspection of catering trade establishments.	drinks production	practice, transportation, storage, distribution, hygiene rules etc).
Control of street food vendors/vending	SSESS has mandate to control vending and could apply to police in specific cases	The same as in the SSESS but toward vending food of animal origin.	TSD according to mentioned laws («On consumer right protection» . and "Food quality and safety") has mandate to control street vending but there is no guidelines on carrying out inspection and TSD applies Russian scientific literature.	No specific activity in other ministries and agencies	According to the mentioned above Laws SSESS, TSD and SVIS are totally involved in this activity, but there is no clear delegation of duties/responsibilities in mentioned laws. There are no official regulations or guidelines (sub laws) on inspection of the street vending in all bodies and they use Russian scientific and specific literature. Both SSESS and TSD use the sanitary norms and rules which obviously overlaps their activity.
Inspection	SSESS has mandate to control all catering trade activities and do it in practice.	The same as in the SSESS but where raw food of animal origin is sold (meat, milk etc)	The TSD Trade Inspection department carries out regular inspection of the catering trade establishments	MoEI inspects trade of the alcohol drinks	SSESS and TSD are totally involved in this activity on a regular basis and use the same sources as mentioned above. The frequency is stated in the government resolution on the inspection of business entities. But in fact the inspections' frequency is not followed well (as mentioned representatives of the private sector, about twice a month on average)
Sampling and testing	SSESS has mandate to take and test food product samples that are sold in the catering trade establishments. For instance cake, salads on microbiological contamination.	The same as in the SSESS where raw food of animal origin is sold (meat, milk etc). Also SVIS has veterinary laboratories in the large and small markets which take and test food regardless of origin on regular (daily) base. Have a look at the same column in the Marketing section.	TSD has mandate and takes and tests food on compliance with standards in case of suspicion or consumer complaint.	MoEI takes and tests samples of the alcohol drinks	There is no regular sampling in place within services and TSD (except markets where SVIS does regular tests although the test's quality is rather doubtful) but, in case of suspicion, sampling and testing is mandatory. Most tests are similar.

Traceability	SSESS is involved in traceability and surveillance of the supply chain of imported and domestic food at the consumer sector in case of emergency (diseases outbreak or food poisonings), but due to undeveloped registration and labeling system particularly domestic food in catering trade the traceability is not adequate (particularly at regional and district levels)	Most foods are sold in the consumer sector have import and domestic nature and come from large and small markets where they have to be certified by SVIS laboratories (or by TSD and SVIS as well in case of imported food). Due to undeveloped registration i.e. record keeping system traceability of food (mainly domestic one) is not adequate and challenging, in some cases impossible.	The same as in the SSESS	No specific activity in other ministries and agencies	Most foods in the consumer sector (catering trade) are either imported or local one and are purchased in the large or small markets where they have to be certified by SVIS (and SVIC and TSD if it is imported one). The traceback of the food products and stuffs coming from the markets "Bazors» is rather poor as there is no well developed registration system in place and identify where certain foodstuff came from and where it was sold is challenging. .
Emergency response	It is mainly MoH mandate and in case of zoonosis MoA usually involves	It is mainly MoH mandate and in case of zoonosis MoA is usually involved	No specific activity	No specific activity in other ministries and agencies	No duplication of activities. Mainly MoH mandate and in case of zoonosis MoA is usually involved. There is no such activity in TSD.
Education	SSESS has mandate to carry out mandatory trainings on basic sanitary and hygiene rules for staff of catering trade establishment and does it during medical clearance.	SVIS carries out training on basic sanitary and veterinary rules that have to be applied for staff dealing with raw food of animal origin. The training includes (sanitation, storage and sale, code of practice, hygiene etc).	TSD also carries out training for the staff of catering trade establishments (the trainings are semi-mandatory). The trainings include sanitation, storage and sale, code of practice, hygiene etc.	No specific activity in other ministries and agencies	Duplication is mainly between TSD and SSESS. The duplication is mainly in subjects of the training
Monitoring food-borne disease	It is mainly MoH mandate and in case of zoonoses MoA is usually involved	It is mainly MoH mandate and in case of zoonoses MoA is usually involved	No specific activity	No specific activity in other ministries and agencies	It is mainly MoH mandate and in case of zoonoses MoA is usually involved. No duplication but there is collaboration between MoH and MoA services.

Abbreviations

SVIS	State Veterinary Inspection Service
SSPPQI	State Service on Phytosanitary and Plant Quarantine Inspection
SSESS	State Sanitary and Epidemiological Surveillance Service
SCCS	State Commission on Chemical Safety
SDCAPP	State department on usage of chemicals in agriculture and plant protection
TSD	Tjikstandard (Agency for Standardization, Certification, Metrology and Trade Inspection)
MoH	Ministry of Health
MoA	Ministry of Agriculture
MoEI	Ministry of Energy and Industry

Ministry or agency	Name of interviewed representatives	Title
Agency for Standardisation, Certification, Metrology and Trade Inspection	Sultonov I.	Deputy Head of Department on State Surveillance of Agriculture and Industry
	Sharipov N	Head of Trade Inspection Department
	Mirzoev R Abduvalieva A	Head of Certification Department Head of Normative-technical Documentation Department
Ministry of Health	Shodmonov P. Alamov B.	Head of Sanitary and Hygiene Department of SSESS. Senior Specialist of Food Hygiene Department of SSESS
	Sufiev A. Ecubov I	Senior Specialist of Sanitary and Hygiene Department of SSESS Senior Specialist of Department on Certification and Accreditation of SSESS
	Talbakov Sh	Head of Department on Certification and Accreditation of SSESS
Ministry of Agriculture	Vazirov Sh	Head of Veterinary and Sanitary Department of SVIC
	Shokhzoda Saidahmad	Head of Phytosanitary and Plant Quarantine Department of SSPPQI
	Mukhinjonov A Salimov T	Senior specialist of the State Veterinary Surveillance Department of SVIS Head of the Department on Bird Diseases of SVIS
	Vokhidov A	Deputy Head of the State Department on Usage of Chemicals in Agriculture and Plant Protection
Committee on Environment Protection under Government of Tajikistan. Commission on Chemical Safety	Davlatov Kh	Deputy of the Head of the Committee on Environment Protection under Government of Tajikistan

	Khalimov J	Deputy of the Head of Department on Ecological Expertise of the Committee on Environment Protection under Government of Tajikistan
Market Farovon	4 Business owners	
LLC Elita	Narzulloev N	Executive Representative in Dushanbe
LLC Isticbol	Khisomiddinoc S	The Head

Library

Law of RT on Consumer Rights Protection

Law of RT on Sanitary and Epidemiological Safety of Population

Law of RT on Food Quality and Safety

Law of RT on Licensing of Services

Law of RT on Standardization

Law on Plant Quarantine

Law on Veterinary

Law on Certification of Production and Services

Law on Production and Safe Handling of Pesticides and Agrochemicals

Resolutions of Government of Tajikistan on National Commission on Chemical Safety

Resolution of Government of Tajikistan on State Commission on Chemical Safety, SSESS, SVIC, SSPPQI and Agency for Standardization Certification, Metrology and Trade inspection.

Annex B: Roundtable discussion on “Organizational arrangements for food safety management in Tajikistan”

Annex B1: Agenda



TRADE PROMOTION PROGRAMME IN TAJIKISTAN

Date: 11 November 2011
Venue: Conference-Hall of the Ministry of Economic Development & Trade

The purpose of the roundtable is to bring together senior administrators and other interested parties to discuss the outcome of a study by ITC consultants on the distribution of official roles and responsibilities within Tajikistan's food safety control system. The intended outcome is to facilitate the development of proposals for improving effectiveness and reducing costs to the public and private sectors by streamlining the organizational arrangements made by government.

- 09:00 **Official opening:** Head of ITC office in Tajikistan
- 09:10 **Session 1:** Introductory presentation by ITC consultants
- 09:40 **Session 2:** Review of descriptive matrix to identify specific issues for consideration - *consultants invite comments on the matrix, particularly in relation to identified areas of overlap/duplication, and gaps in coverage of food safety issues.*
- 10:40 **Coffee break**
- 11:00 **Session 3:** Evaluation through group discussion of identified issues where streamlining could be considered, including priority of action to improve the situation.
- 12:00 **Lunch break**
- 13:00 **Session 4:** Group discussion of the main reform options for resolving these concerns so as to produce a more efficient and effective system for food safety control.
- 14:30 **Coffee break**
- 14:45 **Session 5:** Group discussion of strategies that could be employed to facilitate improvement of food safety organizational arrangements in Tajikistan?
- 16:00 **Session 6:** Summary and wrap-up
-local and international consultants
- 16:30 **Close**

Annex B2: List of participants

Roundtable discussion of organizational arrangements for food safety management in Tajikistan

Venue: Small conference hall of the Ministry of economic development & trade

Date: 10 November 2011

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Annex B3: Presentation



Roundtable discussion of organizational arrangements for food safety management in Tajikistan

Dushanbe, 11 November 2011



Background

This project is being undertaken by the International Trade Centre (ITC). It is financed by the Government of Switzerland as part of project TAJ/61/123A “Trade Promotion in Tajikistan – Phase III”, executed by the ITC.



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Purpose

The purpose of the roundtable is to bring together senior administrators and other interested parties, to discuss ITC's study on the distribution of official roles and responsibilities within Tajikistan's food safety control system.

The aim is to facilitate the development of proposals for improving effectiveness and reducing costs to the public and private sectors by streamlining the organizational arrangements made by government.



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- **Session 1: Introduction**
Background
Objectives of the roundtable discussion
- **Session 2: Review of descriptive matrix on roles and responsibilities**
Examination of the matrix for clarification and correction
Identification of significant duplications of roles and responsibilities
Identification of significant gaps in coverage of the food safety system
- **Session 3: Evaluation of key issues**
Scaling and prioritizing the problem areas
- **Session 4: Options for reform**
Desirable improvements
- **Session 5: Strategies for implementation**
Practical approaches for making changes
- **Session 6: Summary and wrap-up**



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Principles for organisation of a national food safety system

The principles that should guide the framing of an appropriate food safety system include:

- the primary responsibility for ensuring the safety of food rests with the enterprises and people who produce, handle and sell food;
 - the role of government is to ensure that this responsibility is met;
- food control should be applied from farm to table so that safety is maintained throughout the stages of production and distribution;



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Principles for organisation of a national food safety system (2)

- the food control system should be designed so that it uses public and private resources as efficiently as possible in achieving the appropriate level of protection,
 - in particular by following a risk-based approach;



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Principles for organisation of a national food safety system (3)

- the use by food enterprises of modern control techniques such as ISO 22000 and HACCP should be encouraged; and
- the national food safety system should follow internationally-accepted norms and guidelines wherever appropriate and should conform fully with specific international obligations such as those under the WTO Agreement on the Application of Sanitary and Phytosanitary Measures.



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Preferred regulatory scheme: an example

Preferred regulatory scheme components:

- A comprehensive set of **food safety standards** fully harmonized with Codex;
- **Agriculture sector interventions** include controls on chemical, veterinary drug and fertilizer inputs by means such as registration and labelling, checking of sales outlets, promulgation of GAP and education of farmers; “market basket” monitoring for residues in fresh food markets; effective zoonosis control via active and passive surveillance of animals; etc.;
- For **imported food**, maximum reliance on certification by competent authorities of the exporting country, checking of other consignments on risk basis by only one agency present at border;



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Preferred regulatory scheme: an example (2)

- For **processing facilities**, clear infrastructure pre-requisite requirements, both general (applying to every food establishment) and specific for each kind of food establishment (bakery, restaurant, abattoir, etc.); approval for new establishments to commence business, and a re-approval program for existing establishments (with only one agency to be responsible for approval of any individual establishment for food safety conformity); continuing compliance is checked as part of regular inspection or audit;



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Preferred regulatory scheme: an example (3)

- For **production processes** (includes operational pre-requisite requirements, SOPs, etc.), there should be risk-based checking of employee health, sanitation procedures, waste management, water supply, production processes /protocols and controls, ingredient and product storage procedures, etc.; inspection of program processes is based on standard inspection check lists against clear requirements with frequency determined by risk, taking into account whether there is an effective operating quality system in the establishment; only one agency to inspect each facility for food safety purposes;



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Preferred regulatory scheme: an example (4)

- For **transport and storage**, only vehicles carrying high risk foods need to be checked, e.g. refrigerated foods like meat/milk/fish, and possibly export vehicles, and similarly for cold stores;
- For **markets**, a control system to be designed that will manage risk in meat and dairy products that do not come from controlled processing plants; rules for construction and operation of markets; selective registration system for market sellers;
- **Risk-based inspection regimes** implemented by either permanently located staff or visiting inspectors, and using an appropriate combination of scheduled and unannounced inspections;



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Preferred regulatory scheme: an example (5)

- **Product certification** only for products that are not adequately controlled by the other elements of the system outlined here; and
- **Market surveillance** in a limited way to detect situations where additional product control may be justified.



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Principles for organisation of a national food safety system (2a)

“the food control system should be designed so that it uses public and private resources as efficiently as possible in achieving the appropriate level of protection”

- ***duplication of food safety control activities should be eliminated;***
- ***unnecessary food safety control activities should be eliminated;***
- ***additional activities should be added where appropriate;***



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Principles for organisation of a national food safety system (2b)

“the food control system should be designed so that it uses public and private resources as efficiently as possible in achieving the appropriate level of protection”

- ***responsible agencies must cooperate with each other***
 - ***through a standing coordination mechanism at Ministerial level***



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Annex C: High Level Seminar on “Management of modern SPS-related government agencies”

Annex C1. Agenda



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

State Secretariat for Economic Affairs SECO
Государственный Секретариат Швейцарии по Экономике SECO



International
Trade
Centre

TRADE PROMOTION PROGRAMME IN TAJIKISTAN

Senior Executive Seminar on “Management of modern SPS-related government agencies”

Venue: Dushanbe, Hotel “Kayon-1”

Date: **10 November 2011**

0845 - 0900 **Registration and administration**

0900 - 0930 **Opening ceremony and introduction**

- Opening remarks and welcome to participants
- Round table introduction by participants
- Introduction by main presenter

0930 - 1015 *Session 1: The role of SPS agencies*

- Presentation on the functions and characteristics of SPS agencies, and the major management challenges that arise.
- Discussion of management challenges encountered by agencies in Tajikistan*

**Delegates should come prepared to share experiences and issues related to implementation of the SPS control regime in Tajikistan.*

1015 - 1030 Coffee break

1030 – 1115 **Session 2: Risk-based approaches to SPS management**

- Presentation on main concepts and practical approaches
- Identification of issues by participants**

1115 - 1200 **Session 3: Management tools for SPS agencies**

- Presentation on main concepts and practical approaches

1200 - 1330 Lunch

1330 - 1415 **Session 4: Market access strategy**

- Presentation on main concepts and practical approaches

1415 - 1500 **Session 5: Strategies for SPS capacity building**

- Presentation on main concepts and practical approaches

1500 - 1515 Coffee break

1515 - 1600 **Session 6: Seminar wrap-up and feed-back**

Annex C2: List of Participants

Senior Executive Seminar on “Management of modern SPS-related government agencies”

Venue: Hotel Kayon-1

Date: 10 November 2011

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3	Mr. Firdavs Nigmatov	Ministry of Economic Development & Trade of RT	WTO division		www.medt.tj
4	Mr. Bozorali Begmatov	Ministry of Economic Development & Trade of RT	Chief Specialist of Trade & Custom Tariff regulation department	221 87 11 93 481 01 72	www.medt.tj
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28	Mr. Shohin Ruziev		Freelance translator	907 96 04 44	shohinr@mail.ru



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Confederation

Federal Department of Economic Affairs FDEA
State Secretariat for Economic Affairs SECO



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