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**GOVERNMENT OF THE REPUBLIC OF TAJIKISTAN**

# **National Food Safety Strategy**

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## List of abbreviations

BRC	British Retail Consortium
CAC	Codex Alimentarius Commission
CCI	Chamber of Commerce and Industry of Tajikistan
CDC	Center for Disease Control
CIS	Commonwealth of Independent States
DALY	Disability-Adjusted Life Year
DSA	Daily Subsistence Allowance
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FSSC	Food Safety System Certification
GAP	Good Agriculture Practice
GHP	Good Hygiene Practice
GIZ	German Federal Enterprise for International Cooperation
GLOBALG.A.P.	Global Good Agriculture Practice
GMO	Genetically Modified Organism
GOST	State Standard
GVP	Good Veterinary Practice
IAF	International Accreditation Forum
HACCP	Hazard Analysis and Critical Control Points
IHR	International Health Regulation
ILAC	International Laboratory Accreditation Cooperation
INFOSAN	International Food Safety Authorities Network
IPPC	International Plant Protection Convention
ISO	International Organization for Standardization
IEC	International Electrotechnical Commission
ISTC	International Science and Technology Center
ITC	International Trade Centre
MEDT	Ministry of Economic Development and Trade of the Republic of Tajikistan
MoA	Ministry of Agriculture of the Republic of Tajikistan
MoHSPP	Ministry of Health and Social Protection of Population of the Republic of Tajikistan
MoJ	Ministry of Justice of the Republic of Tajikistan
MRL	Maximum Residue Limit
OIE	World Organization for Animal Health

PCR RT	Polymerase Chain Reaction, Real time
QALY	Quality-Adjusted Life Year
RASFF	Rapid Alert System for Food and Feed
RCE	Republican Center of Epizootics
SanPin	Sanitary norms and rules
SOPPAC	State Organization for Plant Protection and Agriculture Chemicalization
SPS	Sanitary and Phytosanitary
SSPIPQ	State Service on Phytosanitary Inspection and Plant Quarantine
SSSES	State Service on Sanitary and Epidemiological Surveillance
ST RT	Standard of the Republic of Tajikistan
SVIS	State Veterinary Inspection Service
Tajikstandart	Agency on Standardization, Metrology, Certification and Trade Inspection under the Government of the Republic of Tajikistan
TBT	Technical Barriers to Trade
UBET	Union of Businessmen and Exporters of Tajikistan
UNECE	United Nations Economic Commission for Europe
USA	United States of America
USAID	United States Agency for International Development
UBET	Union of Businessmen and Exporters of Tajikistan
WHO	World Health Organization of the United Nations
WTO	World Trade Organization

## 1. Introduction

### **Tajikistan and its food, agricultural and livestock sector**

Tajikistan is a former Central Asian, Soviet state that became independent in 1991 after break-up of the Soviet Union. It is a landlocked country with a total land area of 143,100 sq km, where mountains comprise 93% of the land. The country is surrounded by Uzbekistan to the west, Kyrgyzstan to the north, China to the east and Afghanistan to the south. Tajikistan is a member of the Commonwealth of Independent States (CIS), an association of former Soviet republics. The administrative structure of the country is divided into three regions (viloyats), namely: Sughd, Khatlon, Badakhshan and districts of direct subordination which include 13 districts that are under direct administration of the central government. In total there are 65 administrative units (districts and cities). The capital of the country is Dushanbe; its population is about 8 million, about three-quarters live in rural areas.

Agricultural production in Tajikistan increased steadily by around 7.8% a year between 2000 and 2011, boosted mainly by an increase in non-cotton agricultural production. The major agricultural crops are the following: raw cotton, grain, sweet corn, feed corn, rice, potatoes, vegetables, fruits including grapes, nuts and hay.

Livestock in the country is one of the main agricultural sub-sectors and is represented by poultry (about 5 million), small ruminants (4.9 million) and cattle (2.1 million). About three-quarters of the ruminants are concentrated in private farms and household backyards. Major animal products include beef, mutton, poultry, eggs, milk and dairy products. Fishery is a promising sector that presently engages 192 dehkan farmers. Honey production is increasing steadily as an export-oriented agricultural commodity. The production in 2014 was 3510 tons.

Enterprises active in the food industry produce canned goods, different types of oil, margarine, oilseeds, wine and other alcoholic drinks, salt, and are involved in food, meat and milk processing, flour milling, baking, fruit drying, and brewing. Enterprises sell mainly to the domestic market.

The main export markets for food and agricultural products are the Russian Federation (32%), Turkey (16%), Kazakhstan (15%), EU (10%), Belarus (9%). Other markets make up the remaining 18 %. The main export products include fresh and dried fruits, nuts, fresh vegetables, oil seeds and beverages. One of the major promising sectors for expansion of exports market for Tajikistan is fruit and vegetable production.

### **Food safety challenges, including foodborne diseases and food contamination, facing Tajikistan**

Foodborne diseases and waterborne diseases remain a major health problem and continue to pose a serious threat to human health and/or life in Tajikistan. Diseases such as hepatitis A, anthrax, botulism, campylobacter, typhoid, salmonellosis, shigellosis, brucellosis, giardiasis, and echinococcosis have a relatively high incidence. The incidence per 100,000 population of major diseases in 2014 are – diarrheal diseases (673.7), hepatitis A (84.3), dysentery (13.1), brucellosis (11.7), typhoid fever (1.2), anthrax (0.4), botulism (0.15) toxicoinfection (0.02)

The aspect of environmental contamination and persistence of various chemical pollutants caused by agrochemicals represents another threat to animal, plant and human health and safety of food in Tajikistan. During the Soviet era, the country had one of the highest rates

of application of pesticides and fertilizers per hectare in Central Asia, which resulted in excessive concentrations of chemical substances in the majority of arable lands. After independence, the use of agrochemicals declined to some extent inter alia due to their high price, switching to organic fertilizers and biological methods of crop protection. However, the majority of farmers still use chemicals (fertilizers, pesticides and weedicides) and veterinary drugs (antibiotics and hormones etc.) in crop cultivation and livestock husbandry, but the use and level of their residues in many types of agricultural food as well as their influence on food quality and safety are not properly monitored.

The quality of the water used in food production, processing and preparation is crucial for the safety of the food. If the water used is not of drinking water quality, this increases the risk for contamination of food products and thereby foodborne disease in consumers. Thus, water sanitation, both household and water used for irrigation, should also be addressed in the national food control system.

In addition to the existing food safety challenges mentioned in the above paragraphs, Tajikistan would need to consider the risk to its population and the severity caused by food safety hazards, other than those mentioned above, such as environmental hazards like heavy metals and radioactive residues, mycotoxins, allergens, dioxins, genetically modified organisms and ever emerging new food safety pathogenic hazards.

### **Experience of countries in the Commonwealth of Independent States (CIS)**

CIS countries for regulation purposes continue to use the standards established by the Soviet Union and modified by the individual nations after independence, known as GOST-based standards. Most of them are neither in line with Codex and other international requirements. They are not recognized by most of the world's trading countries. This use forms an increasing constraint on CIS participation in international trade, trade diversification, and competitiveness of agriculture and food production. This is the case of Tajikistan where it is relatively easy to export to CIS countries than to other countries where the requirements are in general aligned with international standards.

There is a need for improving understanding among senior policy makers and public sector managers in most CIS countries about the required scope, timeframe, and extent of the process required to change from GOST to international standards. Few realize the significant legislative reforms and institutional reorganizations needed. The principles and concepts of the international standards system are still new to the legislative and regulatory systems in place in CIS countries. In the last few years significant progress has been made by various CIS countries to replace GOST by international standards.

### **Rationale and objective for the development of a national food safety strategy**

Tajikistan's food safety control is mainly concentrated on final product testing and not on the basis of a proactive approach to the control based on the food production chain, namely, "farm to fork" approach. The food control system based on final product testing cannot identify all food safety problems that have emerged during the production and processing of food and ultimately may lead to failures in the safety of the final product. Furthermore, the testing of all final products is unrealistic and practically not feasible, making this type of control both inefficient and ineffective. Moreover, the country does not have testing facilities for all food safety hazards. Therefore, Tajikistan should adopt a modern food safety control system which is risk-based and science-based with a focus on both process control and safety of the final product, so that potential problems related to food safety issues can be identified proactively and on time. Such a proactive and preventive approach is also cost-effective.

Tajikistan's food safety control 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 an appropriate level of protection set by authorized bodies and 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 optimal food safety system for Tajikistan may not be a system that will ensure the highest possible level of food safety (because there are costs for both businesses, associated with compliance to food safety requirements for raising capacity for self control, and for government, associated with food safety education, training and controls) but the most cost-effective system for achieving the level of food safety that is acceptable for safety of the consumers of food (both food placed on the market in Tajikistan and food produced for export). This level of food safety would definitely be risk-based and science-based.

During its process of accession to WTO, Tajikistan committed to streamlining its food control system to ensure its compatibility with the provisions of the WTO Agreement on SPS. This would also ensure that it would be in line with international best practice.

A national food control system comprises of the following elements:

- Food safety policy, legislation and regulations
- Food control management and organization
- Official control and inspection services
- Food control laboratories and surveillance
- Information communication and education/training

The improved food control system will not only ensure safe food products for domestic consumers but also help in resolving food safety concerns related to market access. Consequently, this strategy has a component related to market access.

The Ministry of Economic Development and Trade has been the driving force and the coordinating body for the development of the national food safety strategy. Development and implementation of the national food safety strategy has been included in the Program of Adjustment of the Economy of the Republic of Tajikistan related to its membership in the WTO, which was accepted by the Government of Tajikistan on 31 October 2014, as per decree No. 691. The strategy will serve as a roadmap for the Government of Tajikistan to establish a cost-effective and efficient system for achieving the level of food safety that is defined by the authorized bodies and acceptable for the consumers of food (both food placed in the market in Tajikistan and food that is produced for export).

## **2. Analysis of the current national food control system**

An effective national food control system is essential to protect the health and safety of consumers by assuring the safety of imports and exports as well as foods produced for domestic consumption. It is essential to use the same standards for food exports and those for domestic consumption unless the importing country requirements are more stringent than those for domestic consumption. A national food control system should have a statutory basis and be mandatory in nature. For ensuring that the strategy aims at developing an effective food control system for the country, it is essential to strengthen all

elements of the national food control system. Components and priorities of a food control system will vary from country to country. As a first step to developing the country strategy, analysis of the current elements of the national food control system is summarized below.

## **2 a. Food Safety Policy, Legislation and Regulations**

A food safety policy provides highly visible opportunities to demonstrate medium- and long-term commitment, values, aspirations and decisions by government in ensuring that food safety concerns are prioritized and addressed. The policy offers significant opportunity for jointly establishing priorities and mechanisms to enhance awareness and sectoral incentives for food safety management in countries.

A national food safety policy should fit within the framework of the national health policy and be consistent with overall national health objectives. The content of the policy should be based on the situation analysis and review, scientific evidence and national food safety goals. The policy should clearly describe the objectives, principles, regulatory mechanisms and actions for addressing the main food safety issues and concerns of the sector.

Legislation of a country is the act, which has been promulgated by the parliament or the legislature of the country and mostly deals with administration of the act and powers to the administrative ministries and authorized regulatory bodies while regulations are directives issued by the ministries and authorized regulatory bodies to implement the act.

Even though Tajikistan does not as yet have a documented food safety policy, the commitment of and initiatives taken by the government towards implementing and modernizing food safety control in the country during the WTO accession and post-accession demonstrates the existence of a food safety policy, which now need to be documented, debated and approved.

The main law to provide safety of food products in Tajikistan is the Law on Food Safety 2012 adopted on 29 June 2012 and effective from January 2013. There are other supportive laws, which also have food safety implications such as on Providing Sanitary and Epidemiological Safety of Population 2003, on Veterinary 2010, on Plant Protection 2012, on Production and Safe Handling of Pesticides and Agrochemicals 2003, on Technical Regulating 2009, on Conformity Assessment 2011, on Inspection of Business Entities 2006, on Protection of Consumer Rights 2004. All these laws are supported by a set of regulations.

The Law on Food Safety 2012 in the Republic of Tajikistan was promulgated to fulfill a pre-requirement to the WTO accession process. The law covers the entire food production chain (farm to fork approach) and defines basic principles of modern food safety control such as direct responsibility of manufacturers and suppliers for food safety, risk assessment based control, application of the precautionary principle, traceability, transparency, protection of consumer interest, identical treatment for imported and domestic food products, and minimizing unnecessary obstacles to free trade. It defines powers of authorized state bodies responsible for Healthcare, Agriculture, and Standardization, Metrology, Certification and Trade Inspection. The law has provisions for the authorized state bodies to develop regulations to comply with the requirements on food safety, which are made mostly under laws on Providing Sanitary and Epidemiological Safety of Population 2003, on Veterinary 2010, on Production and Safe Handling of Pesticides and Agrochemicals 2003, on Technical Regulating 2009, on Conformity Assessment 2011, and on Inspection of Business Entities 2006.



The Law on Food Safety provides for the establishment of the Food Safety Coordination Council consisting of representatives of ministries and agencies involved in food safety including individuals (academicians and experts on food safety). The Council is expected to monitor and evaluate the status of food safety in Tajikistan and serve as a scientific and technical advisory body for the Government of Tajikistan on making specific decisions and development of food safety legal acts. The Council has been established by a resolution of the government (No. 495 of 2 November 2013); and the Council has become operational and convened its first meeting on 8 November 2014.

The Law on Technical Regulating 2009 provides a mandate to the authorized body on technical regulating to coordinate the establishment of technical regulations and control their implementation. The technical regulations include sanitary and phytosanitary measures. Tajikstandart has been designated as the authorized body and performs this mandate. It is noted that Tajikstandart performs state control over technical regulations and state supervision in the area of ensuring food safety as per the Law on Food Safety.

The Law on Inspection of Business Entities 2006 imposes a limitation of 10% on the number of enterprises that can be categorized as high-risk manufacturing enterprises. It also curtails the inspection frequency of business enterprises listed as having high-risk level to two inspections annually. The inspection frequency for other business entities is once in three years. This reduces the scope of authorized state bodies to ensure compliance with the Law on Food Safety and is contrary to best international practice, which requires flexibility to carry out inspections of food facilities, based on risk evaluation, thus posing a threat to public health. The Law on Inspection of Business Entities 2006 is currently being revised. However, changes have not been made to align inspection of food-based entities with international risk-based principles.

Although the Law on Food Safety has mostly incorporated international principles of a modern food control system, some areas of concern related to effective implementation of the food control system exist. The most important observation is that there is duplication of control of safety of food products between the authorized state body for Healthcare (SSSES) and the authorized state body for Standardization, Metrology, Certification and Trade Inspection (Tajikstandart). This is because Tajikstandart carries out state control of technical regulations, which include SPS measures. It would also be pertinent to mention here that WTO has separate agreements dealing with technical regulations and SPS measures. These are different as there are specific provisions such as precautionary principle, risk assessment and regionalization, which are applicable to SPS measures and not to technical regulations. The principle of non-discrimination applies to technical regulations but does not necessarily apply to SPS measures. Furthermore, as SPS measures could be laws dealing with food safety, animal or plant health, it may be appropriate to exclude SPS measures from the Law on Technical Regulating.

## **2 b. Food Control Management and Organization**

In order to establish an effective food control system in a country, control needs to cover all food produced, processed and marketed within the country, including imported and exported food and be established and implemented throughout the food chain. Food chain or farm to fork approach is the sequence of stages and operations involved in the production, processing, distribution, storage, retailing and handling of a food and its ingredients from primary production to consumption, locally

as well as in countries where the food is exported. Globalization of food production and procurement makes food chains longer and more complex and increases the risk of food safety incidents with a potential for international ramifications. Effective and harmonized food control shall manage and ensure the safety and suitability of food in each link of the supply chain from farm to fork.

Resolution of the Government of Tajikistan on Establishing Coordination Council on Food Safety № 495 dated 02.11.2013 gives a head start on the development and implementation of food control management and organization in different sectors and agencies such as health and agriculture. The Council had its first meeting on 8 November 2014.

Food control management and organization in Tajikistan at present involves various governmental entities along the food chain. These organizations include the following:

**i. State Service of Sanitary and Epidemiological Surveillance (SSSES)**

SSSES is the authorized state body responsible for sanitary and epidemiological safety of population under the Ministry of Health and Social Protection of Population, which has three major departments namely, Sanitary Department, Epidemiology Department and Department of Highly Infectious Diseases. The Sanitary Department has two divisions, one on Communal and School Hygiene and the other on Certification and Accreditation. The Sanitary Department has two units, the Labor Hygiene and Food Hygiene units. The Division on Certification and Accreditation and the Food Hygiene unit of the Sanitary Department have specific mandate to control food safety in Tajikistan. The Epidemiology Department is responsible for data collection and surveillance of foodborne and waterborne diseases. This office structure is the same at three regional centers (one region is divided into two zones) and at 69 local offices situated in the districts.

SSSES has a network of laboratories – Microbiological (Bacteriological, Mycological and Virology) and Chemical. There are four bacteriological and four chemical laboratories at the regional level and 64 bacteriological laboratories and 24 chemical laboratories at the district level. The laboratories at district level have limited analytical capability and only 39 bacteriological laboratories are operational.

SSSES has 17 sanitary checkpoints (at roads, railways, airports, terrestrial borders, etc.) throughout the country to control food safety of imports.

SSSES has about 80 sanitary doctors (physicians) with a university degree and about 100 assistants engaged in food safety activity. In the laboratory network, there are about 150 technicians.

The Research and Scientific Institute of Preventive Medicine (RSIPM) and the National Nutrition Centre (NNC) under the Ministry of Health and Social Protection of Population provide technical and scientific support to SSSES.

**ii. State Veterinary Inspection Service (SVIS)**

SVIS is the authorized state body on animal health under the Ministry of Agriculture and is comprised of national, regional and district entities. At national level it is represented by Headquarters, the Republican Centre of Epizootics (RCE), National Center of Veterinary Diagnoses (NCVD), Center of State

Veterinary Drug Control (CSVDC), Department of the State Veterinary Surveillance at the Borders and Transport (DSVSBT). SVIS has an office in Dushanbe, three regional offices and 68 Stations on Fighting against Animal Diseases (SFAD), which provide treatment and control of animal diseases. At the regional level under DSVSBT, there are four Veterinary Control Offices where 25 veterinary inspection posts exist, which are engaged in border control at the main air and terrestrial entry points of the country.

The laboratory network includes 22 Veterinary Diagnostic Centers under the National Center of Veterinary Diagnoses (NCVD) and 74 laboratories of veterinary and sanitary expertise in fresh markets countrywide.

The Institute of Veterinary of the Academy of Agricultural Science, Agriculture University of Tajikistan named after Shirinshoh Shohtemur and Institute of Biosafety of the Academy of Agricultural Science offer scientific and technical support to SVIS.

SVIS has about 2200 veterinarians involved in animal disease control, with a bachelor's degree, some having a master's degree. The head of SVIS and of some of its departments in many cases also have a doctorate degree. In the laboratory network there are about 840 technicians with different levels of degrees.

### **iii. State Service on Phytosanitary Inspection and Plant Quarantine (SSPIPQ)**

Under the Ministry of Agriculture, SSPIPQ is an authorized state body for phytosanitary inspection and plant quarantine. Its organizational structure consists of Headquarters in Dushanbe, with a phytosanitary laboratory and a fumigation team at the national level. There are three regional offices and one «district» center serving/covering 13 districts including Dushanbe. The regional offices and the «district» center each have a phytosanitary laboratory. There are 58 checkpoints (roads, railways, airports, terrestrial borders, etc.) with small laboratories throughout the country.

SSPIPQ has more than 280 specialists. They generally have master's degrees in the required specialization.

### **iv. Agency on Standardization, Metrology, Certification and Trade Inspection (Tajikstandart)**

The Agency on Standardization, Metrology, Certification and Trade Inspection is an agency under the Government of Tajikistan and is the authorized state body responsible for technical regulating, conformity assessment, accreditation, standardization, metrology and trade inspection. Tajikstandart has its headquarters in Dushanbe. It has the following departments, which are involved in food safety:

- Department on Technical Regulation, which controls implementation of technical regulations;
- Department of Metrological Assurance of Measurement and Accreditation;
- Trade Inspection, which controls trade, catering trade rules, quality and safety of products and ensuring consumer rights;

Tajikstandart has four regional offices and fifteen sub-regional testing centers (laboratories), which are also responsible for border control. It also tests and certifies food products.

There are 150 employees involved in the control of food products and about 90 in the testing of food products.

**v. State Organization for Plant Protection and Agriculture Chemicalization (SOPPAC)**

SOPPAC is the authorized/competent agency on the management of agrochemicals under the Ministry of Agriculture. The organizational structure at national level is represented by departments of plant protection, prognosis and notification and a toxicological laboratory. SOPPAC has four regional offices, which along with its headquarters, service the entire country.

There are about 30 specialists involved in the management of chemicals used for agriculture at the national level and about 80 persons at the regional level. They have as a minimum a bachelor's degree in agriculture, with most specializing with a master's degree. The toxicological laboratories of SOPPAC were involved in performing different tests such as pesticides identification, active substance identification, their half-life and MRLs in agricultural crops and products. At present the laboratories are equipped with obsolete equipment from the Soviet time, which are unable to meet modern testing requirements. As a result no tests are conducted presently.

**vi. Committee on Environment Protection under the Government of Tajikistan**

The Committee on Environment Protection under the Government of Tajikistan has four departments of which three are involved in monitoring of hazards in the environment, which may also be related to food safety that may come from water, land and air, namely Department of Water Protection, Department of Waste Management and Department of Air Protection. It has a central office and four regional offices with a staff of about 400 experts. The Committee on Chemical Safety, under the Committee on Environment Protection, is responsible for pesticide import and registration in the country.

The Committee has a network of laboratories, one national and four regional. These laboratories monitor water, land and air pollutants. The network of laboratories has a staff of about fifty experts.

**vii. The Agency for Water Reclamation and Irrigation under the Government of Tajikistan**

The agency is an autonomous body under the Government of Tajikistan and is responsible for providing water for agriculture. However, it does not monitor or control the quality or safety of the water provided.

**viii. State Unitary Enterprise “Khojagii Manziliu Kommunalii”**

It is an autonomous body under the Government of Tajikistan, which provides drinking water to households and enterprises. The sources of water are rivers and ground water. It is responsible for water supply throughout the country and has water treatment plants at distribution points. The water treatment is relatively better established in urban areas as compared to rural areas.

It has a network of laboratories at various levels to monitor the chlorine residue level, microbial counts (coliforms and E. coli) and physical (organoleptic) parameters.

SSSES monitors the quality and safety of water provided. It checks the level of chlorine at the end use point and conducts microbiological tests, including pathogen testing, as per SanPin.

To overall conclude on the Food Control Management and Organization from the above status and analysis, it is evident that there is a multi-agency control at some links in the food chain whereas some are not covered by anyone e.g. SSPIPQ has 58 checkpoints while SSSES has 17 checkpoints at roads, railways, airports, terrestrial borders, etc. and SVIS has 25 veterinary inspection posts, which are engaged in border control at the main air and terrestrial entry points of the country for food of animal origin.

In this situation an effective control management and organization is not possible. It is also evident that most of the authorized competent authorities are performing functions with conflict of interest. The agencies are authorized to make their own requirements, enforce them and have their own laboratories. Therefore, although all the authorized competent authorities spend/budget considerable resources (human and laboratories) they are distributed into so many small laboratory units that each single one of them is short of resources for effective implementation.

## **2 c. Official Control and Inspection Services**

The official food control services play a key role in ensuring that food is safe and suitable for human consumption. They also have an impact on the organization and activities of other stakeholders. The responsibility for the supply of safe food is shared by all involved in the production, processing and trade along the entire food chain; the official control services are responsible for the enforcement of food safety legislation. By sampling and testing the food products, inspecting the premises in and processes by which they are manufactured, the authorized bodies prevent the trade of unsafe food. The responsibilities of the official food control services also include inspection, sampling and certification of food for import/export control.

Currently in Tajikistan the official control and inspection services responsible for enforcement of food legislation at various links in the food chain are given below.

### **i. Import**

- SSSES has the mandate to conduct border control of food intended for import into Tajikistan to ensure compliance with the sanitary and epidemiological criteria for listed products subject to sanitary control. Samples of imported food products are taken at the border checkpoints and sent to the nearest laboratory for analysis. Official control procedures at the border include documentary checks of origin, organoleptic and laboratory checks for the presence of hazards and residues that may affect human health based on which a certificate is issued.

Some of the products in the list for SSSES control include products of animal origin such as unprocessed meat. Most of the time testing is not available due to lack of capability to conduct these tests.

- The activities of SVIS are similar to those of SSSES but are applied to food of animal origin, according to a pre-defined list of products needing veterinary

control. The control includes documentary check of origin, organoleptic and laboratory checks on contamination by harmful agents like microorganisms and drug residues. A certificate is issued based on the same.

The current status is that most of the time certificates are issued without proper testing being conducted due to poor human and infrastructure capacity.

- SSPIPQ is responsible for inspection of plants (including fruits, vegetables, cereals, berries, etc.) and also planting material like seeds and seedlings for infestation by notified pests, plant diseases and weeds. Inspection is done only for items listed in the goods subject to phytosanitary control, some of which may not be relevant for food safety. Official control procedures include documentary checks of origin, visual checks on spoilage and laboratory checks for the presence of harmful agents. There are 123 quarantine items (goods/products) subject to phytosanitary control and inspection.

At present there are very limited agents of importance to food safety that are being checked by SSPIPQ. Food products of animal origin are also included in the list of products under control by SSPIPQ, which needs to be reviewed as the main focus and competence of SSPIPQ should be plant health.

- Tajikstandart controls quality and safety of food products (unprocessed and processed foodstuffs which are pre-packed and beverages) intended for import for compliance with technical regulations and for products subject to mandatory certification. Tajikstandart has established a list of products and associated control procedures as per Resolution No. 487 of 2008. It conducts tests in its own laboratories or other accredited laboratories. It also relies on certificates issued by SVIS and SSPIPQ for products listed in the resolution.

- The Service for State Control of Pharmaceutical Activities is a state authorized body responsible for control of pharmaceutical drugs and their sales. It is the state authorized body for the control of imports of dietary and infant foods,

## **ii. Primary production**

At the primary production level all responsibility for control and inspection of primary production of animal and plant products rests with MoA and its departments.

- SVIS is responsible for animal health and prevention and control of zoonotic diseases. It collaborates with SSES for the surveillance of zoonotic diseases. It has the mandate to set official requirements for infrastructure and facilities for production of food products of animal origin, livestock farms and carries out preventive measures like registration of animals to ensure traceability, control of veterinary drugs, vaccination, investigation of zoonotic diseases, mandatory slaughtering and control of sale of live animals in the domestic market. The safety of materials used for livestock propagation e.g. semen, ova, equipment for artificial insemination, is also controlled by the Republican Organization on Purebred Breeding, Thoroughbred, Artificial Insemination, Purchase and Sale of Breeding Stock of MoA, which also performs laboratory testing to confirm that there is no contamination by harmful agents.

The control of animal diseases includes control of bacteria, some of which are also important for food safety e.g. Bovine Tuberculosis, Salmonella, Brucella, etc.

Control of veterinary drugs mostly includes aspects important for animal disease control.

SVIS also controls feed in relation to nutritional and quality aspect. There is, however, no control (storage conditions, moisture and testing) on the aflatoxin level in the feed.

- SSPIPQ sets official phytosanitary requirements according to those of IPPC and is responsible for protection of plant health with regard to quarantine and non-quarantine status of pests during growing (in farms, plantations, gardens, greenhouses, etc. including wild areas) and harvesting stage. The State Seed Inspectorate of MoA is involved in primary production via control of quality and safety of planting materials and performs laboratory checks for infestation by harmful agents and reproductive qualities.

None of the phytosanitary requirements include food safety aspects such as MRLs for pesticides nor are they testing for these MRLs.

- SOPPAC has mandate to set official requirements for and control safety parameters of agrochemicals like pesticides, herbicides, insecticides and fertilizers that are intended for use for plant protection and/or cultivation and their safe application and handling.

The toxicology laboratory under SOPPAC is not functional at present due to lack of resources.

- The Agency for Water Reclamation and Irrigation is responsible for provision and control of water for irrigation.

- The Committee on Environment Protection ensures the regular monitoring of water resources and the impact of environmental pollutants such as agrochemicals and heavy metals.

### **iii. Primary Processing**

- Food of animal origin is controlled by SVIS. It has a mandate to set requirements for codes of practice, permission for construction of premises for primary processing, infrastructure and facilities, mandatory parameters on primary processed meat, egg, milk and fish such as microbiological criteria, veterinary drug residues, testing procedures and methodology, etc. SVIS carries out pre-and post-mortem inspection of animal carcasses and parts thereof (including internal edible organs and hides) at slaughterhouses. The presence of food-borne diseases, especially caused by parasites, is also controlled by SVIS. It is also responsible for risk assessment and management.

Official inspection includes visits to dairy farms, slaughterhouses and enterprises where only primary processing of food of animal origin takes place.

After the inspection visit, a copy of the report on findings is shared with the farms and enterprises. However, no checklist has been developed to record the findings of the visit.

- SSES is responsible for setting sanitary requirements for processing facilities engaged in primary processing of food other than food of animal origin, permission for building and establishing new enterprises, identification of the risk

level and setting frequency of inspections based on the Law on Inspection of Business Entities. It also monitors the safety of water used.

SSSES, however, is unable to carry out regular monitoring of chemicals like pesticide residues, mycotoxins such as aflatoxins and antibiotics/growth promoters in the food of plant origin, which has undergone primary processing.

#### **iv. Secondary Processing**

- SSSES establishes codes of practice and requirements for facilities and establishments, manufacturing, product specifications and traceability. Control and inspection activities are implemented according to sanitary norms and rules (SanPin), standards and guidelines from the Soviet era and some adapted Russian SanPin, standards and guidelines. Official control activities within the country include visual checks of the state of sanitary-hygienic conditions of premises (placement of equipment, transportation requirement, etc.), documentary checks (origin of materials used in production and health status of staff, passing hygiene practice exam), sampling and laboratory testing of ingredients and raw materials used in processing. It also monitors the safety of water used.

After the inspection, SSES issues a report on observations and need for improvements; however, there are no checklists to record all observations, based on which the conclusions are made.

SSSES usually takes samples as per the frequency specified in the Law on Inspection of Business Entities 2006. The method of collection of the samples and their transportation to the laboratory is based on the guidelines from the Soviet era.

In case the conditions in the establishment are not appropriate, SSSES has the mandate to close the premises; however, there are no set guidelines or procedures on conditions warranting the closure of premises and procedures of doing so or destroying the product or disposing it.

- Tajikstandart is also involved in control of foodstuffs and non-alcoholic beverages, which undergo secondary processing. They check compliance with technical regulations, SanPin and trade rules. Official checks include, inter alia, checking of quality of end products by sending samples of products to its laboratory and labeling requirements.

With regard to certification of alcoholic beverages, the responsibility for control lies with the Ministry of Industry and New Technologies of Tajikistan.

#### **v. Sale/Retail**

##### **Fresh Market (Bazar)**

- SVIS has the primary mandate to control food safety in the fresh market (bazar). SVIS has dedicated staff and a laboratory located in each bazar. Smaller bazars are branches of a larger bazar and are therefore controlled by SVIS located in the larger bazar. SVIS has the mandate to set sanitary and veterinary norms for the bazar, according to which the bazar needs to function, which includes, for instance, segregation of food products to avoid cross-contamination. SVIS also has the mandate to set norms for the fresh products sold in the bazar.



The Sanitary and Veterinary requirements used currently are mainly from the Soviet time and the laboratory facilities located in the markets are not able to conduct all required tests for food safety.

All fresh products, such as meat, fish and raw milk that are intended to be sold in the bazar, need to be visually checked by SVIS and samples taken to test for food safety.

The majority of laboratories located in the bazar at present have limited capability to perform analyses related to food safety; therefore the approval is mostly based on visual and organoleptic checks.

- SSES at the bazar level controls the overall sanitation of the market place, including water supply, sewage system, ventilation, lighting and heating system, solid waste management and the health status of sellers in the markets. SSES sets norms and rules for the infrastructure and facility requirements of the markets. Permission to open a bazar needs to be sought from and approved by SSES. The approval is also based on SanPin requirements and standards. Individual shops in the market that are not selling fresh products such as meat, fish and raw milk, are controlled by SSES. Inspection (planned as well as unplanned) is done as per the SanPin requirements. In case of emergencies such as food poisoning or foodborne disease outbreaks, SSES investigates and takes appropriate actions as per the requirements of sanitary norms and rules. For emergencies related to fresh products of animal origin, SSES is mandated to conduct a joint investigation along with a veterinarian from SVIS. In case of emergency or suspicion, samples are taken and sent to the SSES laboratory. It also monitors the safety of water used.

- Within Tajikstandart there is a department on trade inspection dealing, inter alia, with food safety control in shops located in fresh markets. The department verifies compliance of the shop with the requirements of the standard ('Retail Trade Services – General Requirements' 1037-2001 ST RT) and applicable SanPin (which include product handling, storage, labeling – price and expiry dates, wearing of protective clothes, having medical clearance, etc.). Non-compliance with any of these requirements can lead to confiscation of the product and its disposal as per its guidelines.

In case of suspicion, Tajikstandart has the mandate to collect samples and send them to its own laboratory for testing while the products are confiscated, pending actions to be taken once the results are known.

## **Street Food**

Not all food sold on the streets are classified as street food e.g. fresh fruits and vegetables sold in streets are not street food. Street food is defined as ready-to-eat food and beverage sold and sometimes prepared in a street or other public place, such as a market or fair, by a hawker or vendor, often from a portable food booth, food cart or food truck, for immediate consumption. Street food is low in cost and offers an attractive alternative to home-cooked food. Street foods often reflect traditional local cultures and exist in an endless variety.

Street food vending in Tajikistan is prohibited; however, it still continues in Dushanbe and more so in peri-urban areas. Street food vending is traditional and a very important segment of the unorganized or unofficial sector of the food industry in Tajikistan. It also provides informal self-employment in urban and

peri-urban area of Tajikistan. A large number of city dwellers from different spheres of life such as students, tourists, casual laborers, cart pullers and other such workers, rely on street food for their daily meal.

It would be appropriate for Tajikistan to recognize street food vending as an appropriate sale/retail outlet and set standards and systems to control the safety of the food sold by vendors instead of prohibiting it.

### **Catering and Restaurant**

- SSSSES has the mandate to control the safety of food in the catering industry. It is authorized to set norms for the facility and infrastructure, manufacturing, codes of practice, raw material control, handling, storage and transportation. At present the norms used are from the Soviet era and some recent ones adapted from the Russian Federation. Inspection (planned and unplanned) is conducted by SSSSES to verify compliance with the set norms.

Routine samples of water used for catering, catering food and swabs from utensils, table surfaces, hands of staff, etc. are taken for testing.

- SVIS is also authorized to control the catering trade entities and conducts sanitary and competency evaluation of workers to check their knowledge of good practice of processing of raw animal products and issues certificate of compliance.

- Tajikstandart has established a standard on Trade Rules for Catering Entities (2009) which includes codes of practice such as the requirements for infrastructure, layout, segregation for vegetarian food and non-vegetarian food, handling, storage and transportation. Tajikstandart inspects catering entities, including restaurants, for compliance to the requirements set out in the rules.

### **Supermarket/Market/Shops (Retail)**

- SSSSES has the mandate to control the safety of food and water in supermarkets/markets/shops. SSSSES sets norms and rules for the infrastructure and facility requirements of the retail facility. The permission to open a retail outlet needs to be approved by SSSSES. The approval is also based on SanPin and standards. Inspection (planned as well as unplanned) is done as per the SanPin requirements and provisions of the Law on Inspection of Business Entities. In case of emergencies such as food poisoning or food-borne disease outbreaks, SSSSES investigates and takes appropriate actions as per the requirements of sanitary norms and rules. For emergencies related to fresh as well as processed food of animal origin, which have undergone primary processing, SSSSES is mandated to conduct a joint investigation along with a veterinarian from SVIS.

In case of emergency or suspicion, samples are taken and sent to the SSSSES laboratory.

- Tajikstandart has the mandate to set standards for retail outlet requirements. The Trade inspection department inspects the retail outlets for requirements as per the set standard. These requirements include infrastructure and facilities, codes of practice, use of appropriate storage devices, correctness of labels, etc.

## **vi. Storage (Warehousing), Transport and Distribution**

For official control of the safety of food at the warehousing, transport and distribution stages in the food chain, the state authorized bodies are SSSSES, SVIS and Tajikstandart.

- SSSSES has the mandate to set sanitary norms and rules ) for warehousing and transport against which they inspect. For warehousing they inspect the premises, infrastructure, codes of practice, segregation of products, their handling and storage conditions and equipment (refrigeration), etc.

For transportation, all vehicles intending to transport food products need to apply to the transport department of the Ministry of Transport for licenses. SSSSES is mandated to inspect the transport vehicle to verify compliance with requirements stated in SanPin and issues the 'Sanitary Passport'. This is, however, at present done only if requested by the transport owner.

SSSES has the mandate to confiscate food products in warehouses if they are not stored appropriately, their expiry date is exceeded or they could have a potential to cause a food safety incidence. SSSSES also has the mandate to close down a warehouse if the infrastructure and facility are not found to be appropriate.

Most of the SanPins used at present are from the Russian Federation.

- SVIS has the mandate to certify warehouses against compliance to the sanitary and veterinary requirements and practices for storage of the raw animal products. SVIS is authorized to suspend warehouse activity if the infrastructure and facility are not found to be appropriate or the storage practices are not complied with. It may confiscate the product and together with other authorized bodies destroy them appropriately.
- Tajikstandart also has the mandate to set standards for warehousing infrastructure, facilities and transportation. It inspects the warehouse to verify compliance with the set standards. The standard includes requirements on infrastructure and facility, codes of practice, handling of food products, their storage conditions and equipment, labeling of the food products.

## **vii. Export**

For controlling the safety of food being exported the official control and inspection is the mandate of SSSSES (for all products excluding raw products of animal origin), SVIS (for raw products of animal origin) and Tajikstandart (for all products including products of animal origin). SSPIQ controls export of products of plant origin (fruits and vegetables) for requirements other than food safety. The respective control procedures of SSSSES, SVIS and Tajikstandart for food products and its manufacturing infrastructure and processing are same for products manufactured for export and the domestic market. When exporting, at the border, the Customs Officer ensures that all documents are in order before permitting export. There is an official document issued by each state authorized body to Customs to ensure it checks the required documents for each product being exported. The control includes activities as described below:

- SSSSES has the mandate to set sanitary norms and rules for inspection of exporters' premises which includes codes of practice for manufacturing, control of processing, quality and safety of raw material, handling of product, its storage

and transportation, end product testing, labeling, etc. All exporters need to obtain permission for manufacturing by SSSSES. SSSSES makes a preliminary inspection (s) to verify compliance to the norms during construction and modification of the facilities. Once permission is granted, SSSSES conducts inspection according to the provisions of the Law on Inspection of Business Entities.

For each export consignment samples are taken and sent to the laboratory for analysis. However, in practice, samples are taken only when an exporter requests a certificate of compliance. At present the customs officer is not regularly checking the SSSSES approvals.

- SVIS has the same mandate to control exports as SSSSES, but for products of animal origin. The SVIS control on export is better than that of SSSSES as the customs officer ensures clearance before permitting shipment of food products of animal origin to be exported.
- SSPIPQ has the same mandate to control exports as SSSSES and SVIS but for products of plant origin. It has the mandate to check SPS measures including quarantined pests and diseases other than food safety e.g. pests and diseases.
- Tajikstandart has the mandate to control export of all products, irrespective of its origin. Tajikstandart sets standards for the exporter's processing facility and infrastructure, codes of practice, manufacturing control, raw material control, handling of the product, its storage and transportation. An exporter needs to apply to Tajikstandart once it starts manufacturing for approval for export. Tajikstandart inspects the facility before giving approval.

The exporter needs to apply to Tajikstandart for a certificate of conformity of products for each shipment with a sample of the product for testing. Tajikstandart issues a certificate, which is checked by the customs officer, to permit export of the product.

To conclude overall, the current roles and responsibilities of all these agencies show significant duplication of regulatory activity, fragmented surveillance and a lack of coordination. There is a need to strengthen expertise and resources amongst different agencies. It is also observed that the responsibility for protecting public health conflicts with obligations to facilitate trade or develop the food industry and its sectors.

Proper training of food inspectors is a prerequisite for an efficient food control system. As current food systems are quite complex, the food inspector must be trained in food science and technology to understand the industrial processes, identify potential safety and quality problems, and have the skills and experience to inspect the premises, collect food samples and carry out an overall evaluation. The inspector must have a good understanding of the relevant food laws and regulations, their powers under those laws, and the obligations such laws impose on the food sector. They should also be conversant with procedures for collecting evidence, writing inspection reports, collecting samples and sending them to a laboratory for analysis. With gradual introduction of HACCP systems in the food industry, the inspector should be trained to handle HACCP audit responsibilities. Clearly, there is a continuing need for training and upgrading the skills of existing inspectional staff and having a policy for human resource development, especially the development of inspectional specialists in specific technical areas.

## 2 d. Food Control Laboratories and Surveillance

Laboratories are an essential component of a food control system. For any country's food control system to be effective and efficient a well-equipped laboratory network and surveillance of foodborne diseases and monitoring of contaminants in the food chain are essential.

The establishment of laboratories requires considerable capital investment and they are expensive to maintain and operate. Therefore careful planning is necessary to achieve optimum results and ensure cost efficiency. The number and location of the laboratories should be determined in relation to the objectives of the system and the volume of work. Having a central reference laboratory equipped for sophisticated and reference analyses is also beneficial.

In Tajikistan each authorized state control body has a network of its own, at the national, regional and district level as described in section 2b. The capacity of each network of laboratories to conduct analyses related to food safety is as detailed below.

SSSES has a huge number of laboratories; however, they are not adequately equipped to respond to all food safety challenges. There is a considerable difference between the diagnostic capabilities of the laboratories at different administrative levels. These laboratories are outdated and do not have appropriate infrastructure; equipment are also either outdated or broken, there is a lack of reagents and consumables. Erratic supply of water and electricity with no adequate backup is another problem most of the laboratories face, in addition to lack of required manpower. Even though the SSSES laboratory network has received substantial financial support from international funding agencies to strengthen its diagnostic capabilities, the assessment conducted by WHO and USAID in 2011 has clearly suggested that much more needs to be done to bring the SSSES laboratory network in compliance with international requirements such as ISO/IEC 17025. Even the central laboratory, which has an impressive collection of modern equipment, is unable to perform tests due to lack of reagents and consumables. At present SSSES conducts very limited food safety tests. Most of the analyses done for safety of food products performed by SSSES laboratories are bacteriological. Testing capacity/capability for analyses related to other food safety hazards like heavy metals, toxins, drugs and agrochemical residues is very limited. Tests are performed as per the Soviet GOST standards with initial and limited attempts being made towards aligning these test methods to Codex/international standards.

The laboratory network of SSPIPQ and SVIS are in a similar condition to that of SSSES. The number of laboratories is many but the food testing capability is limited. The funding of international donors in the recent past has not really made much difference for the same reasons, i.e. lack of reagents and consumables. At present none of these laboratories are regularly conducting any food safety tests or identifying or detecting any harmful agent in the food products.

Tajikstandart too has a large network of laboratories with capabilities to test for a wide variety of quality parameters but limited analyses related to food. Considerable funding by international donors in the recent past has enabled Tajikstandart to obtain accreditation of three of its laboratories in accordance with ISO/IEC 17025; however, the scope of accreditation is only for a limited number of tests for food and feed. Also, these tests are based on GOST standards, which may not be in line with international tests and methods.

Currently surveillance of foodborne and waterborne diseases as well as food poisoning is carried out by SSSSES. SVIS conducts surveillance of zoonotic diseases. Every month data is collected and analyzed by both SSSSES and SVIS. This data is then aggregated annually in the reporting forms of SSSSES and SVIS. Data flow is vertical i.e. from district to national level and is mainly paper based. This affects the early warning system. The surveillance system uses mainly incidence data and does not apply methods of analytical epidemiology or modern health indicators such as DALY and QALY indexes, which would assist identification of causative agents and disease burden.

Data sharing between SSSSES and SVIS and collaborative activities on prevention and control of zoonoses have improved in the recent past but there are still essential gaps to be addressed. These mainly include inconsistency of data on incidence of some zoonoses in humans and animals, ad hoc joint investigation of zoonoses in humans, lack of an adequate early warning system, inadequate inter-disciplinary collaboration between both services in health education activities, inadequate epidemiological data exchange and coordination at district level, for example, on vaccination of animals, identification of risk areas and planning of activities.

## **2 e. Information, Communication and Education/Training**

An increasingly important role for a food control system is the delivery of information, education and advice to stakeholders across the farm-to-fork continuum and risk communication between relevant groups. These activities include the provision of balanced factual information to consumers; the provision of information packages and educational programmes for key officials and workers in the food industry; development of train-the-trainer programmes; and provision of reference literature to extension workers in the agriculture and health sectors.

Food control agencies should address the specific training needs of their food inspectors and laboratory analysts as a high priority. These activities provide an important means of building food control expertise and skills in all interested parties, and thereby serve an essential preventive function.

There are various activities to inform consumers about safety of food products in Tajikistan. There are radio programmes where the rights of consumers are explained and TV programmes showing the destruction of food products whose date of expiry has been exceeded. Tajikstandart informs consumers about food safety through its magazine on “Standards and Quality”.

The Center of Healthy Lifestyle in MoHSPP provides health education activity with regard to food safety. It prepares and disseminates booklets and posters on food safety. Meetings are organized with communities where they are briefed on the prevention of food-borne diseases. It carries out train-the-trainer programmes for healthcare workers in primary healthcare facilities on the prevention of foodborne and waterborne diseases at district level. However, the activity for health education is limited due to scarce funding. Health education information for consumers is shared through mass media and outreach activity, again within the framework of projects of international organizations.

International communication on the trend of infectious diseases, including foodborne diseases and zoonoses, is maintained according to the International Health Regulation (IHR) after its adoption by the Ministry of Health in 2005. SSSSES, SVIS and SSPIPQ serve as the technical representatives of Tajikistan’s membership of

CAC, OIE and IPPC respectively and are responsible for communicating with them, inter alia, about data related to standards.

Emergency risk communication strategy on hazards related to food safety along with diseases and threats is clearly outlined in the national plan of Tajikistan on pandemic and epidemic preparedness and response. This strategy is being implemented by relevant ministries.

The Institute of Postgraduate Training of Medical Workers provides various training courses, including courses on hygiene and epidemiology. The Tajik Technological University conducts graduate degree courses in Food Technology. The Tajik Agriculture University and the Tajik State Medical University conduct degree courses, the curricula of which include food safety. The curricula of these courses should include hygiene requirements in line with the Codex General Principles of Food Hygiene including HACCP. While the number of food processing enterprises is increasing there is a shortage of workers with the necessary skills, knowledge of good hygiene practice and understanding of food technology and food safety at both operational and managerial level.

Regular educational activities on hygiene practices are introduced by SSES through the mandatory training course for staff of food enterprises, sellers and food handlers who must take this course and obtain medical clearance prior to employment and then regularly once in a year. The same is applicable to SVIS for staff of entities subject to veterinary control. The training courses at SSES and SVIS should be aligned with the Codex General Principles of Food Hygiene including HACCP.

Many epidemiologists of SSES and SVIS have undergone Field Epidemiology Training Programs (FETP) in Almaty, Kazakhstan, by the Center for Disease Control of USA. Such training is now being conducted in Dushanbe for Tajik and Afghan epidemiologists in a training center established by CDC. SSES specialists also have been trained on modern methods of detection of foodborne pathogens using PCR RT under the ISTC project T-1989. However, there are no staff development programmes in the food safety agencies, although there is ad hoc training for the staff.

There are various training programmes recently conducted, in progress or planned. ITC developed the capability of local consultants to facilitate implementation of ISO 22000 and enterprises to implement ISO 22000 under a three-year project. Under this project, two enterprises were certified, capacity on food safety implementation was built in six enterprises and four local consultants were trained on food safety, all of whom are still working to further its awareness and implementation in the country. Following on this, GIZ organized a two-year programme to train local consultants on HACCP and assist enterprises to implement HACCP. Twenty-two enterprises implemented HACCP and ten of them are certified. Enterprises now have access to a local firm using the trained consultants for implementation of HACCP. They also have access to HACCP certification at reasonable cost through the services of a foreign certification body using local consultants. They can also be certified by Tajikstandart. ITC trained local trainers on the WTO Agreements on TBT and SPS from a business perspective; these local trainers conducted workshops in various regions of Tajikistan. FAO and WHO conducted training on HACCP for SSES and SVIS. Furthermore, WHO has conducted many workshops including training of foodborne disease surveillance, prevention and control, and supported the development and distribution of food safety risk communication materials. The results from the FAO project on "Capacity development in food safety risk management of food processing

enterprises and national authorities in Kyrgyz Republic and Republic of Tajikistan” (February 2014 – April 2015), provide a good basis for dissemination of information about GHP throughout the country. This project is ongoing and working groups have been established on the development of National Guides on introduction of GHP in production of raw milk and dairy products, home canning, production of pastry products and food service (catering).

The Chamber of Commerce and Industry is planning to raise awareness about food safety (GLOBALG.A.P. and HACCP) for the business sector under a UNDP programme. The Association of Small and Medium Enterprises of Tajikistan is working with a non-governmental organization, British Expertise, to implement an EU funded project "Development of the food and vegetable processing sector" which aims to educate companies about HACCP and its implementation in the Khatlon region. This project is also implemented in Kyrgyzstan with the Association of Food Industry Enterprises of Kyrgyzstan. The Exporters Association of Isfara, Entrepreneurs Association of Sogd and the Association of Dehkans and Farmers « Zardoluparvaroni Asht » provide information and training on food safety related to dried fruits.

Tajikstandart conducts regular training on food safety for enterprises in the framework of the 'State Quality Program 2013-2015'. The Centre for International Migration and Development (a joint operation of GIZ and the German Federal Employment Agency) has a programme to build the capacity of Tajikstandart to certify to ISO 9001, HACCP and ISO 22000.

It is observed that the Union of Consumers deals, inter alia, with complaints about the safety of food products. It does not have any information or educational programme on food safety.

At present, information on certification and international standards in business and governmental circles is disseminated mainly within a limited circle. In most cases, such information is not clear to entrepreneurs and particularly to the farmers (farms growing vegetables and fruits, livestock breeders, poultry and dairy farmers). Furthermore, there is limited awareness about how exporters can obtain information on SPS measures related to food safety of the importing countries from WTO SPS enquiry points.

Tajikistan's participation at international fora such as CAC, OIE and IPPC has been on an ad hoc basis. The harmonization of Tajik standards with international standards, especially those dealing with food safety related parameters, will improve with increased participation in these international standard-setting bodies. Strengthening Tajikistan's participation in international food safety control and communication such as INFOSAN is crucial and critical for sharing information so that prompt response to food-related emergencies can be planned and expedited.

To conclude overall, there is no inventory of information, education and advice provided to stakeholders across the entire food supply chain as this is done on an ad hoc basis presently. Making such an inventory would help to identify gaps and lead to remedial actions. Awareness about food safety has to be improved for various target groups so that they become more conscious about food safety and make informed choices when buying food products. The business sector should be made aware of how to obtain information about technical requirements for export markets. There is need for business operators to upgrade their knowledge on modern food safety techniques so that they can produce safe food. There is also a need for staff of the authorized bodies to upgrade their knowledge to enable them to do official control,



surveillance and conducting tests related to food safety effectively. Participation in international fora, especially those of standard-setting bodies should be enhanced.

### 3. Market access

Access for food and agricultural products of Tajikistan to CIS countries is relatively easy in view of similar requirements. As for markets of developed countries, it may be more difficult in view of stringent technical regulations and SPS measures imposed by them. It is sometimes a lengthy and time-consuming process. First, exporters have to obtain information about the voluntary and mandatory requirements in the importing country. Then they have to adjust their processes and products to meet these requirements. For example, for fruits and vegetables, market access is granted only after an import risk analysis is conducted, after comparing the pests and diseases associated with the produce in both countries. The final step is the demonstration of conformity to the requirements. This requires the exporting country to have competent bodies e.g. for meat and meat products, fish and fishery products, and honey.

Enterprises exporting products obtain the mandatory requirements for their products from the importer or from the national enquiry points for TBT and SPS. However, it is noted that there is limited awareness about the possibility of obtaining information about the mandatory requirements from the national enquiry points in the importing country, following Tajikistan's accession to WTO. In one case, a potential exporter of salt had to go to Kyrgyzstan to the national standards body there to obtain the requirements for salt. In another case, an exporter of grapes obtained information from the enquiry points from China and USA but did not obtain an answer from an enquiry point of another country. There is need to create awareness that it is an obligation of a WTO Member to provide information about mandatory requirements and, if the information is not provided, it could be taken up at the WTO Committee on TBT or SPS, as appropriate.

Tajik enterprises exporting to other CIS countries have their products tested at Tajikstandart and its certificates of conformity are accepted in these countries through a multilateral recognition agreement. However, there are some cases where they have not been recognized and the goods had to be recertified. Sometimes enterprises prepare company standards to incorporate standards used in the importing country, such as UNECE standards, and these standards are included in the register of Tajik standards. Information about voluntary requirements, such as ISO 22000 and private standards such as FSSC 22000 are obtained from the importer. Various enterprises exporting their products have their HACCP systems certified, as HACCP has become a mandatory requirement in many developed countries.

Fruit and vegetable production is one of the major promising sectors for expansion of the export market for Tajikistan. The resolution of the Government of Tajikistan № 624 "On approval of the State Target Program to enhance the export capacity of the fruits and vegetables processing sector for 2010-2012" highlighted the need to meet requirements imposed by TBT and SPS measures in the prospective export markets. There is a lack of mechanism to provide public financial support and information for processors of fruits and vegetables; it is essential to provide information and advisory support to exporters, producers and service providers to establish and promote a positive image of the Republic of Tajikistan and export enterprises and support access of goods and services to foreign markets.

In August 2009, a shipment of pistachios from Tajikistan and dispatched from Turkey was rejected at the EU border, on grounds that the accompanying health certificate was inadequate. More recently, in July 2014 Italy rejected apricot kernels from Tajikistan via

Turkey because of higher level of aflatoxins. The export potential of the country could be considerably increased if export goods such as food plants including vegetables and fruits, dried fruits, honey, walnuts, passed tests in compliance with international standards.

The majority of beekeepers of Tajikistan are not able to export their honey to USA, the Russian Federation and Qatar due to MRLs of fumigants being above permissible limits. Furthermore close placement of apiaries to roadways was disclosed during the visit of the USA authorized inspection agency, as this was not according to their requirements. Only 29 tons of honey was exported to USA in 2010.

The Russian Federation banned import of dried fruits and nuts from Tajikistan in 2010, allegedly to prevent polio transmission. While this case was settled via bilateral consultation, it was the cause of vast damage, especially in the Sugd region of Tajikistan.

No specific trade concern has been raised by Tajikistan at the WTO Committees on SPS and TBT. There is need to create awareness about the right of Tajikistan to raise issues of specific concern at that committee in case Tajikistan is of the opinion that there is no justification for denying entry into or rejection by the importing country.

It takes considerable resources to obtain market access for food and agricultural products. This requires the establishment of a market access strategy at national level, based on a private-public partnership, to make optimum use of limited resources. It is noted that there is no such documented market access strategy in Tajikistan.

#### **4. Strategies for achieving an effective and efficient food control system and for market access**

A food control system should cover the entire food chain, from food produced of animal or plant origin, through processing and distribution within the country, including imported and exported food, to the level of the consumers. Such a system should have a statutory basis and be mandatory in nature. However, no mandatory activity can achieve its objectives fully without the cooperation and active participation of all stakeholders e.g. farmers, industry and consumers. The term Food Control System is used to describe the integration of a mandatory regulatory approach with preventive and educational strategies that protect the whole food chain. This food control system should include effective enforcement of mandatory requirements, along with training and education, community outreach programmes and promotion of voluntary compliance. Such an integrated approach will facilitate improved consumer protection, effectively stimulate agriculture and the food processing industry, and promote domestic and international food trade. Applying a coordinated, collaborative, multidisciplinary and cross-sectoral approach to address potential or existing risks that originate at the animal-human-ecosystem interface is the basis of One Health Approach.

One Health is the integrative effort of multiple disciplines working locally, nationally, and globally to attain optimal health for people, animals, and the environment as they are interconnected. The principles of One Health provide an effective approach for dealing with problems related to the human-animal-ecosystem interface. The approach is applied to emerging, re-emerging and high impact infectious diseases in humans and livestock.

The One Health approach, which recognizes the interaction of environmental factors in determining disease outcomes, can also be applied beyond infectious diseases. Food of animal origin is one important area of human-animal interaction. If integration of food safety in One Health is strengthened and the approach is extended to plants, it would serve as an effective tool for the food control system to be implemented in all its elements. For

integrating food safety into this approach, animal, plant and environmental hazards leading to food safety need to be established, controlled, tested and monitored throughout the food chain. In order for this approach to be efficient and effective, there is a need to improve inter-agency coordination and communication.

Factors which contribute to potentially unsafe food include environmental and water contamination, presence of zoonotic diseases, improper agricultural practices in farms (agricultural, dairy, poultry, fishery, etc.); poor hygiene at all subsequent stages of the food chain of each food sector; lack of preventive controls in food processing and preparation operations; misuse of chemicals; contaminated raw materials, ingredients and water; inadequate or improper storage, etc.

Therefore the strategy to strengthen the Tajik Food Control System should focus on mandatory and voluntary controls for each contributing factor at every appropriate stage. The implementation of this national food safety strategy will enable the country to determine priorities and develop an integrated, coherent, effective and dynamic food control system. The strategy provides a better coherence in situations where there are several food control agencies involved with no existing national policy or overall coordinating mechanism. In such cases, it prevents confusion, duplication of effort, inefficiencies in performance, and wastage of resources.

Keeping this in view, the proposed strategy for each of the elements of the food control system is as stated below.

#### **4 a. Food Safety Policy, Legislation and Regulations**

Tajikistan at the time of WTO accession showed strong political will and leadership in implementing the WTO agreements. As a result the accession period promoted adaptation of various legal and policy documents, including food safety legislation. Therefore, with no formal documented food safety policy and a fairly new legislation promulgated primarily as a commitment to accession and for clarity on the distribution of roles of authorized competent authorities, the following strategies are proposed to strengthen this component of the food control system:

- i. Documentation and formalization of the food safety policy, which fits within the framework of the National Strategy of Health of Population of Tajikistan for 2010 – 2020.
- ii. Review of the Law on Technical Regulating 2009 to consider exclusion of SPS measures from the scope of this law, the Law on Inspection of Business Entities 2006 to give flexibility to risk-based inspections and all other laws dealing with food safety.
- iii. Review of all regulations and SanPins dealing with food safety for elimination of duplication and harmonization with international standards and development of additional subsidiary regulations required for food safety along the food chain.

#### **4 b. Food Control Management and Organization**

An effective food control system requires policy and operational coordination at the national level. While the details of such functions will be determined by the national legislation, they would include the establishment of a leadership function and administrative structures with clearly defined roles, responsibilities and accountability for issues such as: the development and implementation of an integrated national food safety strategy; operation of a national food control programme;

monitoring/surveillance of chemical and biological hazards in various products along the food chain and becoming members of INFOSAN and RASFF; securing funds and allocating resources; setting standards and regulations; participation in international food control related activities; developing and implementing national procedures for food safety emergency response, food recall systems including traceability; carrying out risk analysis; etc.

Core responsibilities include the establishment of regulatory measures, monitoring system performance, facilitating continual improvement, and providing overall policy guidance.

Considering the present status of the Tajik food control management and organization and the goals to be achieved to ensure an efficient and effective food control system, the following strategies are proposed:

- i. Consolidation of the multiple agency concept for food control management and reallocation of resources in each entity, for effective and efficient control along the food chain and for minimizing duplication, before considering the establishment of a single food safety agency.
- ii. Strengthening of inter-agency coordination to improve the food safety control, to develop national procedures for food safety (emergency response, recall, risk analysis) and for improved communication internally along the food chain and internationally by linking with INFOSAN and RASFF.

#### **4 c. Official Control and Inspection Services**

Food control and inspection needs to be reviewed and/or updated to increase efficiency of transparent control, greater ability to provide farm-to-fork oversight of food safety, and enhance international market access. While the actual structure of official control and inspection services varies from country to country, each country needs to develop and strengthen the most suitable options for its food control system in terms of legislation, infrastructure and enforcement mechanisms. It has never been more important for developing countries and transition economies to implement and enforce a food control system based on the modern concept of risk analysis for all major food safety hazards, which is science based and includes risk assessment (hazard identification, hazard characterization, exposure assessment and risk characterization), risk management and risk communication.

The administration and implementation of food laws require a qualified, trained, efficient and honest food inspection service. The food inspector is the key functionary who has day-to-day contact with the food industry, trade and often the public. The reputation and integrity of the food control system depends, to a very large extent, on the integrity and skills of food inspectors.

Considering the current status of official control and inspection services, the following strategy is proposed to strengthen control:

- i. Conduct of Risk Analysis to categorize food products in Tajikistan and determination of the appropriate type and frequency of risk-based control and inspection required for various categories of products.

#### **4 d. Food Control Laboratories and Surveillance**

For a small country, Tajikistan has far too many laboratories, which are with different agency/ministry controls i.e. about two hundred in total. For food control laboratories

and surveillance to be effective and efficient, all laboratories may need to be under the control of one agency or ministry, and conduct tests for the jurisdiction of the municipal (jamot), district (nokhia), regional (velayety) and central (jumkhuri) authorities. The Food Control Management should, however, lay down the norms for food control laboratories and monitor their performance.

The laboratories should have adequate facilities for physical, microbiological and chemical analyses. In addition to simple routine analysis, the laboratories can be equipped with more sophisticated instruments as some already are, apparatus and library facilities as required. It is not only the type of equipment that determines the accuracy and reliability of analytical results but also the qualifications and skills of the analyst and the reliability of the method used. The analytical results of a food control laboratory are often used as evidence in a court of law to determine compliance of food products with regulations or standards of the country. It is therefore necessary that utmost care be taken to ensure the efficient and effective performance of the laboratory. The introduction of analytical quality assurance programmes and accreditation of the laboratory by an appropriate accreditation agency within the country or from outside, enables the laboratory to improve its performance and to ensure reliability, accuracy and repeatability of its results. Prescription of official methods of sampling and analysis also support this effort.

Another important element of a national food control system is its integration with the national public health surveillance system so that links between food contamination and foodborne diseases can be established and analyzed. Access to reliable and current intelligence on the incidence of foodborne illness is critical. The laboratory facilities for this type of activity are generally situated outside the food control agencies. It is essential, however, that effective linkages be established between food control agencies and the public health system including between epidemiologists and microbiologists. In this way information on foodborne diseases may be linked with food monitoring data, and lead to appropriate risk-based food control policies. This information includes annual incidence trends, identification of susceptible population groups, identification of hazardous foods, identification and tracing of causes of foodborne diseases, and the development of early warning systems for outbreaks and food contamination.

Considering the current status of food control laboratories and surveillance and what is required for efficient and effective food control the following strategies are proposed:

- i. Building the capacity of laboratories to conduct tests for food safety hazards according to international standards for all products in Tajikistan and accreditation of the laboratories for these tests.
- ii. Analysis of and proposal for restructuring of the network of laboratories of authorized bodies for effective and efficient control of testing for food safety and optimal utilization of resources.
- iii. Modernization and strengthening of the food safety surveillance system, including the early warning system, and ensure appropriate links with surveillance systems for public and animal health.

#### **4 e. Information, Communication and Education/Training**

A food control system can only be effective if all stakeholders are involved in food safety throughout the food chain under the farm-to-fork approach. This can be

achieved if there is a proper framework for the provision of information, education and advice to stakeholders. These stakeholders in the food chain include, inter alia, producers, farmers, transporters, storage warehouses, primary processors, secondary processors, retailers including catering services and restaurants/hotels, and consumers. This will facilitate each stakeholder to perform its role properly and ensure that food safety is maintained throughout the food chain. Producers have an important role to play by using a preventive approach such as HACCP so that products leaving their premises consistently comply with food safety requirements. Consumers should be well informed so that they can differentiate between safe and unsafe food and protect themselves. Consumers are in a position to exert pressure on manufacturers and suppliers of food products such that they obtain safe food. This pressure is in fact more effective than any official control and inspection services.

At present there is no database of information, education and training provided to stakeholders. There is limited information provided to consumers. Curricula in educational institutions should include the requirements of food hygiene and HACCP to ensure that the trained persons are aware of modern practice related to food safety. At present training on various aspects of food safety throughout the food chain is conducted on an ad hoc basis, participation in international fora is limited and awareness of stakeholders about how to obtain information about food safety measures is also limited.

Considering the current status for the provision of information, communication, education and training to stakeholders in the food chain the following strategies are proposed:

- i. Review and updating of curricula having a component on food safety and hygiene to align them with the requirements of Codex General Principles of Food Hygiene including HACCP, and addition of topics on relevant to food safety such as risk analysis, risk-based inspection, early warning systems (RASFF and INFOSAN), etc.
- ii. Development of the capability of relevant organizations to conduct awareness and short-term training programmes on hygiene, food safety and relevant topics for food and agricultural enterprises.
- iii. Building the capacity of staff of food control agencies on various topics related to food hygiene and safety such as hygiene, HACCP, risk analysis, traceability, risk-based inspection, sampling and testing methods, and accreditation of laboratories (ISO/IEC 17025).
- iv. Enhancing participation of Tajikistan in regional and international fora.

#### **4 f. Market Access**

Tajikistan has a great potential to market agricultural products in international markets. However, market access for food and agricultural products is lengthy and costly as importing countries establish SPS measures to protect the health of their citizens from food safety hazards and their plants and animals from pests and diseases not prevalent in their country. Market access requires a public-private partnership to establish priorities for export. There is need for obtaining information promptly about applicable SPS measures in potential export markets and impending changes in SPS measures of current export markets to adapt export products to these changes. Specific trade concerns related to unjustified SPS measures

hampering export can be taken up at the WTO Committee on SPS. Compliance with mandatory standards will allow entry of agricultural produce and food products into export markets. However, organized buyers such as supermarket chains may not buy these products if they do not comply with additional voluntary requirements set by them.

Considering the current situation regarding market access the following strategies are proposed:

- i. Strengthening of the Service Bureau at the Chamber of Commerce and Industry to provide information about technical requirements in export markets.
- ii. Establishment of a Sub-committee on TBT and SPS, under the Committee on Trade Facilitation, to benefit from the WTO Agreements on TBT and SPS, and enhancing participation of Tajikistan in these committees.
- iii. Development of a market access strategy for Tajikistan, based on a public-private partnership, to benefit, inter alia, from the WTO Agreement on SPS.
- iv. Promoting awareness and building capacity on implementation of voluntary standards (international and private) on food hygiene and safety in the Tajik food industry as self-control and due diligence.

## **5. Framework for implementation of the strategy**

Implementation of the strategy will require high-level commitment to increase the level of manageability and efficiency of the reforms to be implemented in the area of food safety. Tajikistan would require certain radical changes in its food control system to comply with the requirements in the WTO Agreement on SPS. This Tajikistan would need to demonstrate during its first trade policy review by WTO.

It is proposed that the Food Safety Coordination Council be responsible for implementation of this strategy for all elements of the food control system, as one of its mandates is the development and submission of proposals to the Government of the Republic of Tajikistan to enhance food safety. It is also proposed that MEDT be responsible for implementation of this strategy with respect to market access as it is responsible for trade and implementation of the post-WTO accession plan.

The mandate and responsibilities of the Food Safety Coordination Council are the following:

- implementation of continual monitoring and evaluation of food safety to ensure an adequate level of protection of life and human health, protection of flora and fauna;
- development and submission of proposals to the Government of the Republic of Tajikistan to enhance food safety;
- development, approval and implementation of joint activities of the authorized bodies providing control of food safety;
- consultation and settling disputes raised during implementation of the control activities by authorized bodies providing control of food safety;
- implementation of other tasks as per the provisions of the Law of the Republic of Tajikistan "On food safety";
- establishment of a special working group to verify the situation of food safety;
- collaboration with local state executive bodies.

The composition of the Food Safety Coordination Council is the following:

- Deputy Prime Minister of the Republic of Tajikistan, Chairman;

- Deputy Minister of Health and Social Protection of the Population of the Republic of Tajikistan;
- Deputy Minister of Agriculture of the Republic of Tajikistan;
- Deputy Minister of Industry and New Technologies of the Republic of Tajikistan;
- Deputy Minister of Economic Development and Trade of the Republic of Tajikistan;
- Deputy Chairman of the State Committee on Investments and State Property Management of the Republic of Tajikistan;
- Deputy Director of the Agency on Standardization, Metrology, Certification and Trade Inspection under the Government of the Republic of Tajikistan;
- Deputy Chairman of the Board of the Union "Tajikmatlubot";
- Director of the National Center on Nutrition of the Ministry of Health and Social Protection of the Population of the Republic of Tajikistan;
- Head of the State Service of Sanitary and Epidemiological Surveillance of the Ministry of Health and Social Protection of the Population of the Republic of Tajikistan;
- Director of the Research and Scientific Institute of Preventive Medicine of Tajikistan;
- Rector of the Tajik State Medical University named after Abu Ali ibn Sino;
- Chairman of the State Unitary Enterprise "Hurokvori" under the Ministry of Industry and New Technologies of the Republic of Tajikistan;
- Director of the State Scientific Institution "National Institute of Nutrition," Ministry of Industry and New Technologies of the Republic of Tajikistan;
- Head of the State Veterinary Inspection Service of the Ministry of Agriculture of the Republic of Tajikistan;
- Head of the State Service of Phytosanitary Inspection and Plant Quarantine of the Ministry of Agriculture of the Republic of Tajikistan;
- Heads of relevant departments of the Academy of Science of the Republic of Tajikistan;
- Chairman of the Union of Businessmen and Exporters of the Republic of Tajikistan;
- Chairman of the Union of Consumers of the Republic of Tajikistan.

As the focus of the Food Safety Coordination Council is food safety and the strategy has a component on market access, it should work in close collaboration with the Sub-committee on TBT and SPS under the Committee on Trade Facilitation.



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