

Occasional Paper

Advancing Food Safety in China



United Nations in China
March 2008





© Copyright
Office of the United Nations Resident Coordinator in China, 2008

All rights reserved. Information from this booklet may be freely reproduced
as long as credit is given.

Cover Photo: UNHCR /A. Oschetti

Design: Wang Gang

Advancing Food Safety in China

Contents

1. Foreword	3
2. Framework	4
3. Policy note 1: Food safety legislation	9
4. Policy note 2: Food safety management	12
5. Policy note 3: Inspection and enforcement	15
6. Policy note 4: Trade dimensions	18
7. Policy note 5: Monitoring and surveillance	20
8. Policy note 6: Communication	22
9. Policy note 7: International cooperation	25

FOREWORD

Over the past year, intense media attention has focused on food safety in the People's Republic of China. Though the headlines have sometimes been simplistic, the issues underlying them are anything but. As in other countries, they involve a broad range of stakeholders both at home and abroad, and require a truly multi-sectoral and multilateral response.

Since the headlines broke, the Government of China has been quick to respond, both highlighting the work it was already doing and taking many further concrete actions. It has also recognized that there is more work to do, and has indicated that it would welcome capacity building support and advice both from the international community in general and from the UN System in particular.

The purpose of this paper is to set out the UN System's analysis of the food safety situation in China. It draws on the collective experience and expertise of all the relevant UN Agencies, given their collective role as custodian of global norms and standards in this area. It includes seven separate chapters with policy notes on food safety legislation, management, inspection and enforcement, trade dimensions, monitoring and surveillance, communication and international cooperation, each of which presents a series of policy recommendations.

It is our hope that the analysis and ideas presented in this paper will make a strong contribution to China's ongoing efforts in the area of food safety. The United Nations System stands ready to further assist China in its endeavours.

I would like to thank UN colleagues and Agencies in China and their respective Headquarters for their active and collective work on this document.



Khalid Malik

UN Resident Coordinator

FRAMEWORK

Introduction

This publication seeks to set out the UN System's analysis of the food safety situation in China, as part of the UN System's contribution to China's ongoing efforts in the area of food safety. Recently China has made great progress in recognizing and responding to its food safety challenges. Various UN Agencies have supported government efforts in reforming aspects of the Chinese food safety assurance system. The United Nations stands ready to further assist China, and it is hoped that the analysis and recommendations contained herein might provide a basis from which such further cooperation and support could be provided.

This section sets out the overall policy and institutional context of food safety in China, and to summarize the UN System's main recommendations. The following policy notes present analysis and policy recommendations in their respective areas.

Context

As part of its efforts to reform its economy and provide for a more harmonious society, the People's Republic of China has made great progress in increasing its food supply through increased production and diversification of its food sources. At the same time, consumers in China have been seeking improved safety and quality of the food sold on the domestic market. More recently, there has also been widespread media coverage of issues around the safety of food exported from China to overseas markets.

For many years, China has paid close attention to the safety of the food it produces, processes, transports and trades. Indeed, the Eleventh Five-Year Plan (2006-2010) clearly recognized that improving food safety is a critical national task as part of realizing a vision of human-centred, science-based development.

The Decision on Further Strengthening Food Safety Supervision (2004) allocated responsibility for

food safety to a number of Government bodies, as follows: the Ministry of Agriculture supervises the production of primary agricultural products; AQSIQ oversees the quality and hygiene of food processing; the State Administration of Industry and Commerce supervises food circulation and distribution; and the Ministry of Health oversees the catering industry. Meanwhile, integrated food safety supervision and coordination are the responsibility of the State Food and Drug Administration (which was reconstituted in 2003), and supervision of imported and exported foodstuffs is the responsibility of AQSIQ. In addition, in 2007 China established the State Council Leading Group on Product Quality and Food Safety, bringing together all relevant Government bodies under the leadership of Vice Premier Wu Yi.

Between them, the relevant Government bodies have put in place and implemented a wide range of policies, plans and actions in the area of food safety in recent years. These include: the Hazard-free Food Action Plan (implemented from 2001), market access systems including a production license system, a compulsory inspection system and a market access labelling system (from 2001); sample surveys for food quality (since 1985); a programme of rectification of conditions in small food workshops; a responsibility system for food safety at local and regional level; intensified efforts in the food circulation and catering industries; a food safety monitoring network; a nationwide significant health risk warning and early response system; a food recall system; and an improved food safety credit system. These measures have been complemented by specific additional measures related to the safety of imported and exported food. In addition, the legal framework continues to be strengthened, with a new draft food safety law currently under review by the National People's Congress. Attention has also been given to improving and rationalizing the standards system, establishing a food certification and accreditation system, establishing a food safety inspection and testing framework, and actively participating in international activities around food safety. The Government's White Paper on Food Quality and Safety, published in 2007, set out what the Government is doing in each of these areas.

This considerable attention to food safety has resulted in year on year improvements in the quality and safety of both exported food and food for domestic consumption. In the case of exported food, surveys conducted by the main importing countries and regions have consistently indicated acceptance rates of over 99%. In the case of food for domestic consumption, according to the national foodstuffs sample survey in the first half of 2007 the acceptance rate of foodstuffs

had reached 85.1%. China is itself also an importer of some foodstuffs; surveys show that the acceptance rate of such imports is consistently above 99%.

Despite this progress, China recognizes that, as a developing country, it still has more to do to bring its overall level of food safety, including the standards and the in-process food production controls, up to the standards of the most developed countries. It has committed itself to make further unremitting efforts to ensure the safety of the food supply, and wishes to strengthen exchanges and cooperation with the international community in order to do so.

Summary of recommendations

The United Nations System in China recognizes and applauds the many actions taken by the Government of China in the area of food safety, as detailed above, and the consequent improvements in food safety that have been witnessed. It recognizes that the sheer scale of China's food industry makes the task of aligning all Chinese food products with international standards an ongoing and arduous one. Without considering food service establishments, there are currently around 450,000 different enterprises engaged in food production and processing in China. Of these, around 350,000 are small enterprises with less than ten employees which have a collective market share of less than ten per cent but present many of the greatest food safety challenges. In addition, there are many informal and unregistered producers whom it is even harder to oversee and regulate. Nonetheless, the United Nations shares the Government's view that great priority should be attached to further improving food safety, not least because of the significance of the matter both in terms of public health and potential economic and social impacts both in China and in its main export markets.

In this paper, China's food safety efforts to date have been compared with international best practices and guidance, in order to identify areas in which China could further develop its response to food safety.

International guidance on strengthening national food control systems has identified the objectives of a food control system as the following:

- Protecting public health by reducing the risk of foodborne illness;
- Protecting consumers from unsanitary, unwholesome, mislabelled or adulterated food; and
- Contributing to economic development by maintaining consumer confidence in the food system and providing a sound regulatory foundation for domestic and international trade in food.

Meanwhile, the principles and values that underpin food safety activities put forward by the World Health Organization (WHO) and the Food and Agriculture Organization of the United Nations (FAO), which national authorities must take into consideration, include the following:

- Recognizing that food control is a mutually shared responsibility among government, the food industry and consumers.
- Maximizing risk reduction by applying the principle of prevention as fully as possible throughout the farm-to-table continuum;
- Developing risk-based food safety strategies using sound scientific risk assessment and best practices in risk management;
- Establishing holistic, integrated initiatives which target risks and impact on economic well-being;
- Establishing emergency procedures for dealing with particular hazards (e.g., recall of products);

Drawing on international best practice, this paper suggests that China might consider the establishment or further refinement of the following, applying the principles and values outlined above:

- A legal framework developed in a coordinated manner that is consistent nationwide;
- A coordinated and unambiguous food control management system;
- A food safety standards system that is risk-based and in harmony with international standards, i.e. Codex Alimentarius;
- A unified, authoritative and efficient food safety testing and inspecting system;
- A uniform and standardized food certification and qualification system;

- An effective food safety emergency response system;
- An improved food traceability system;
- An enhanced information service system that has links with the media to ensure the media and consumers can have confidence in the safety of the food in China;
- An effective programme of education and training in food safety;
- An efficient foodborne disease surveillance system covering the entire country;
- A well-designed national food contaminants monitoring system
- A strengthened programme of international communication and cooperation; and
- Greater emphasis on public-private partnership.

POLICY NOTE 1: FOOD SAFETY LEGISLATION

Key challenges

Need for a modern food safety law. The development of relevant and enforceable food safety laws and regulations is an essential part of any modern food control system. Modern food law should contain the necessary statutory powers to ensure jurisdiction over food safety from farm to table and allow competent food authorities to take immediate preventive and enforcement measures. Attention must be given to avoiding conflict and confusion resulting from inconsistencies between different laws and from a lack of clarity concerning responsibilities of different government departments and enforcement authorities. In this regard, countries with laws in the different areas of agriculture, consumer protection, food hygiene and safety, quarantine, import control, export control and environmental protection must pay particular attention to the clarity and consistency of definitions and responsibilities so that all key stakeholders, including industry, consumers and government, can contribute to the goal of protecting public health and the interests of the consumer and facilitating international trade.

Obligations under the WTO. In the formulation of food regulations and standards, countries should take full advantage of standards, guidelines and other recommendations of the Codex Alimentarius Commission, which is supported jointly by WHO and FAO. As a signatory to the World Trade Organization (WTO), China is committed to meet its obligations under various WTO agreements, including the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). In this context, the SPS Agreement makes explicit reference to the Codex Alimentarius as representing the international consensus with regard to health and safety requirements for food. In addition to the 'yardstick' set out by Codex, a country can choose additional guiding rules and regulations but any such requirements should be based on science and not unduly restrict trade in safe food.

Raising the bar for better food safety legislation. In summary, as China continues to develop, food safety legislation must be strengthened to meet the growing expectations of Chinese consumers for access to safe and nutritious food. In order to achieve this level of protection, such legislation

should:

- Provide an appropriate level of health protection;
- Require that policies and decisions are based on high quality independent scientific advice;
- Apply a preventive approach to food safety by placing explicit responsibility on food producers to produce safe food;
- Require transparency in the way matters relating to food safety and quality are handled;
- Require provision of appropriate information to all stakeholders including consumers;
- Require that foods can be traced and effectively recalled; and
- Require China's commitment to international obligations.

While China does have a basic food hygiene law, its scope does not extend to the whole food-chain. Although it does focus on safeguarding public health and protecting the interests of consumers, the law does not apply the model of risk analysis. Rather, the statutory basis for food safety is spread across relevant articles of various laws and regulations and no law places clear responsibility on food enterprises for the production of safe products.

Policy implications and actions

An adequate food safety system is founded on legislation that enables food safety management, organizational structure and authority, compliance and enforcement, monitoring, surveillance and investigation, and provision of information and communication, transparency and stakeholder involvement. It is recognized that the Government of China is already actively addressing many of the issues, often in cooperation with UN agencies.

Legislative framework. A number of opportunities for improvement can be identified, especially in the areas of providing sufficient safeguards to public health and adequately protecting the interests of consumers. A number of key areas that need to be addressed include: (i) protecting consumer's health as a top priority, (ii) prohibiting the marketing of any food that may be contaminated, adulterated or harmful to human health and (iii) placing explicit legal responsibility on food enterprises throughout the food-chain to produce safe food. Animal health and the

safety of animal feed are issues closely related to food safety and also need to be addressed. A number of options were developed to help consolidate food safety responsibilities and these are now under consideration by the government.

Models for legislative change. Lessons can be learned from the legislative experiences of other countries and organizations, such as Australia, Canada, the EU, Ireland, Singapore and the USA, which have all adopted different models. In this regard, China may want to consider the following:

- Regulatory provisions putting forth guiding principles that China intends to apply to its food safety system, including those related to risk analysis, precautionary procedures transparency, traceability; and emergency preparedness and response;
- Food safety legislation that moves from a 'command and control' approach to a risk-based regulatory approach where industry is responsible for demonstrating compliance rather than regulators having to prove non-compliance;
- Legislation that provides the risk managers in the different ministries with the powers and resources necessary to effectively audit all high-risk food premises and operations and to impose appropriate penalties for those contravening the legislation. Such risk-based compliance programmes operate in a number of countries;
- Legislation to establish an authority with the overall statutory responsibility for the enforcement of all food safety legislation in China is desirable.

POLICY NOTE 2: FOOD SAFETY MANAGEMENT

Key Challenges

Clarifying management arrangements. In China, regulatory control of food safety is a responsibility shared between national, provincial and local government authorities. At the national level the principal government authorities that share responsibilities for food safety control are the State Food and Drug Administration (SFDA), the Ministry of Health (MOH), Ministry of Agriculture (MOA), State Administration for Quality Supervision, Inspection and Quarantine (AQSIQ), the State Administration of Industry and Commerce (SAIC), and the Ministry of Commerce (MoFCOM). The broad administrative structure in China involves 33 provinces, autonomous regions or municipalities under the Central Government, 333 regions, municipalities, autonomous prefectures and 2861 counties and county level municipalities. Most of these provincial, regional and county level administrations have food safety control authorities reporting to the SFDA, MOH, MOA, SAIC and AQSIQ in their respective areas of competence. In general, the food safety authorities at different levels are directly responsible to their respective regional government body but receive instructions of a regulatory or technical nature from their national agency, as in the case of the Health Bureau of the MOH. In some cases, the food safety authorities of different levels are operating under a direct chain of command from central level, as in the case of the provincial Exit-Entry and Quarantine Bureau under AQSIQ.

Strengthening institutions. In 2003 the State Food and Drug Administration (SFDA) was established with a broad remit for the coordination and supervision of the management of food safety, including the investigation of serious outbreaks of foodborne disease. In 2004 the SFDA was given additional instructions concerning the food safety regulatory system. The main measures were:

- Clarification of responsibilities for food safety between government departments to avoid overlap;
- Increased enforcement efforts to be made by local government; and
- Identification of clear chains of accountability for food safety between different levels of

government.

While this has helped, SFDA has not yet been given sufficient staff or the resources to fully implement its mandate. There remains a situation where a relatively large number of agencies are involved in the area of food safety with overlapping responsibilities but without any practical and effective means of coordinating the development of policy or its implementation.

Policy implications and action

Single agency models. Consolidation of all responsibility for protecting public health and food safety into a single food control agency with clearly defined terms of reference has considerable merit. It acknowledges the high priority that Government places on food safety and demonstrates a commitment to reducing the risk of foodborne disease. The benefits that result from a single agency approach include: (i) uniform application of protection measures; (ii) ability to act quickly to protect consumers; and (iii) improved cost efficiency and more effective use of resources and expertise. However, there are few, if any, examples of a single agency system in its purest form where a single agency not only addresses food control from farm-to-table but also enforces it at all levels of government (e.g., national, state and local). One possible problem arising from a pure single agency system is the lack of separation between risk assessment and risk management functions. Accepted wisdom is that these functions should be kept separate but it is possible to make arrangements so that they are effectively kept separate. In practice there are few opportunities for countries to build a new food control system based on a single agency. Generally speaking, this model may be more effective in small countries or at the Provincial level.

Integrated models. Integrated food control systems warrant consideration where there is desire and determination to achieve effective collaboration and coordination between agencies across the farm-to-table continuum. Such systems avoid disruption to the inspection and enforcement role of the key agencies while promoting uniform application of control measures across the whole food-chain throughout the country. Integrated systems also allow effective separation of risk assessment and risk management functions, resulting in objective consumer protection measures with resultant confidence among domestic consumers and credibility with foreign buyers. Finally, such integrated systems offer the opportunity to change fundamentally the

original less efficient way in which food control is managed.

POLICY NOTE 3: INSPECTION AND ENFORCEMENT

Key challenges

An essential service: Inspection and enforcement services play an essential role in the management of food-related risks. Resources for such services, however, are often limited and insufficient. For these reasons the use of a risk management approach by enterprises, and the audit of this by enforcement authorities, provide a more effective means of protecting public health and the interests of the consumer. Better use of resources can also be achieved through the development of a strategy of inspection and enforcement, especially when it is based on a science driven assessment of the risk that enterprises represent to customers. Currently, the responsibility for food safety inspection and testing in China are mainly distributed among four government agencies, the MOA, MOH, AQSIQ and MoFCom. Due to a lack of technical capability some laws, regulations and standards cannot be upheld, for example through an inability to measure a relevant substance with sufficient confidence.

There is an overall lack of resources in China for food inspection and compliance assessment services. However even these limited resources are unevenly distributed across the country. In a few Provinces, human, technical and financial resources are readily available to support training of inspectors, and the undertaking of sampling and analysis and inspection programmes. Generally resources are much more limited, particularly in the central and western regions. In some municipalities and counties there is such a severe shortage of resources that comprehensive inspection services cannot be provided to meet the urgent needs of the market. The authorities responsible for providing inspection and monitoring services sometimes cannot meet the current requirements in respect to food safety.

With limited resources it is very difficult to implement effective control. In this situation enforcement authorities focus only on the most serious problems for action. Such a regulatory approach has several major deficiencies, including:

- Enforcement tends to be ad hoc without any overall strategy or plan;

- Reliance on end-product testing of food samples rather than examining the whole process of production;
- Inability to inspect all enterprises especially small entities along the value chain; and,
- Imbalance of food control activities between cities and the countryside with far more attention being given to cities.

Policy implications and action

Because of difficulties of coordination within Government, there are corresponding difficulties of coordination between the different inspection and enforcement authorities at the local level. This gives rise to duplication in enforcement in some areas and insufficient enforcement in other areas. This is an inefficient use of valuable public resources and places an excessive burden on enterprises. Enforcement activity should be rationalized based on the management arrangements for food safety control that the Government must finally make centrally. In order that national policy is implemented at local level, stronger links and lines of accountability are required between central Government agencies and enforcement authorities at the local level. This would also help ensure a greater consistency of enforcement policy and standards across the country. This is also essential for responding rapidly and effectively to food safety emergencies caused by natural, accidental and intentional contamination of food.

Enforcement in China of food control places an excessive reliance on end-product testing with very little use of auditing as an inspection tool. This is wasteful of resources and both inefficient and ineffective in protecting public health and the interests of consumers. This is a significant challenge and will require an enormous effort by the Government to change the thinking and attitudes into those needed to bring about appropriate behavioural change. Fundamental to this goal is the wide spread introduction of good practices by the various food sectors, including Good Agricultural Practices (GAP) and Good Veterinary Practices (GVP) by agriculture, Good Aquaculture Practices (GACP) by fisheries, Good Manufacturing Practices (GMP) by the food processing industry and Good Hygiene Practices (GHP) across all sectors. In some instances, it may be appropriate to apply specific risk-based food safety control systems, such as the Hazard Analysis and Critical Control Point (HACCP) system.

Beyond inspection and enforcement, the Government will need to provide more information and education for food enterprises. In this regard, food inspectors should be trained so that they will be capable of taking on an education role to promote understanding and encourage voluntary compliance by the food industry. This is essential if long-term improvements are to be made in food safety that meet both the domestic needs of China and international expectations in regard to exports. Food safety advisory services for all actors in the food supply continuum should be strengthened in order to provide guidance and advice in simple straightforward language. This includes, for example, information on the use of pesticides and veterinary drugs and in addressing basic risk management on farms, as well as control of microbiological hazards at various stages of the food supply. Consideration needs to be given to rationalising inspection and enforcement activities in line with the management arrangements for food safety control that the Government of China may decide to implement.

POLICY NOTE 4: TRADE DIMENSIONS

Key challenges

In 2004 China's share of the global trade in food was 4.1%. Total food exports have been increasing at a rate of over 20% year-on-year to reach USD 27 billion in 2006. Chinese food exports to the United States have increased five-fold since 1990 and are expected to continue to grow. However, food safety concerns by importers and foreign consumers may threaten this growth. Bans on Chinese shrimp, honey and other food products in Europe and Japan along with related international debate in 2007 have reinforced the impression that both consumers and policy makers are ready to act on safety concerns.

In 2006 and the first half of 2007, the USA found that 0.8 and 0.9%, respectively, of imported Chinese foodstuffs were substandard. For the EU, the corresponding figures were 0.1% and 0.2%, respectively. For Japan, the figure for 2006 was 0.58%. These figures are relatively low in comparison to other countries' exports. However, the unjustified connection between food and other Chinese exports inevitably makes the ramifications of every safety violation considerably larger. The implications of unmanaged product risks on China's USD 593 billion (2004) annual export market may be significant because of these ripple effects. Even minor changes in the trade regimes of developed countries vis-à-vis Chinese goods might result in major losses in export earnings and in dampening of employment growth.

The fact that about 80% of Chinese food producers and processors are small and medium sized enterprises makes both enforcement by regulators and compliance by the industry particularly challenging. In addition, the implications of closing businesses that do not meet standards are significant considering the large number of workers employed in by these enterprises. However, given the expectations of consumers in industrialized nations where food safety has long been regulated by stronger and more mature mechanisms, the ability to assure that Chinese food exports meet those expectations should be a matter of priority for both food traders and the Government.

Policy implications and action

Improving the safety of food exports will require the strengthened of existing mechanisms that are currently in place. While certification of food producers and enterprises to export food will continue to be of primary importance, greater efforts to promote education and training related to GAP, GVP, GACP, GMP and GHP as well as HACCP and other food quality and safety assurance systems, need to be undertaken, particularly for small and medium sized enterprises. In this regard, information on food safety requirements of major food importing countries, e.g. Japan, USA and the Republic of Korea, needs to be made widely accessible and continually updated. Auditing of food safety systems should focus on food products and exporters that pose the greatest risks of food safety problems. To verify the certification system, additional human and financial resources are needed to undertake more visible and credible monitoring efforts, including inspections, across the whole production chain as well as final safety checks. In addition, the capability to identify and rapidly respond to food safety emergencies and other serious regulatory problems is essential to maintaining confidence in the system. Given domestic concerns for food safety, efforts should be made to merge product lines for export and domestic markets, which will contribute to the general improvement of food safety in China.

POLICY NOTE 5: Monitoring and surveillance

Key challenges

Monitoring. Monitoring of food contaminants and surveillance of foodborne diseases are important to help countries develop their risk management policies and formulate food standards. In general, the surveillance and monitoring systems in China are limited. In respect of pesticide residues, China mainly monitors a small part of the range of foods consumed for only a limited number of pesticides. Because of its size and climatic variability China uses a wider range of pesticides than most other countries. China conducts periodic total diet studies to assess the level of chemicals in food as consumed. These studies currently provide the best estimate of dietary exposure to chemicals in the Chinese diet. In respect of microbiological contamination China monitors five organisms in food. A considerable amount of monitoring of food for export is carried out for possible contaminants, but this tends to benefit trade more than health. As a result the monitoring of the domestic food supply is needed to provide a nationally representative picture of food contamination in China. Planned surveys would provide more valuable information and make better use of scarce valuable resources. Surveillance of human foodborne disease is very limited and investigation of foodborne disease outbreaks is uneven. Such monitoring and surveillance activities are essential to provide the bases for developing appropriate food safety policies, conducting risk assessment and planning, implementing and evaluating risk management interventions.

Surveillance of foodborne disease. With the changes in technology in food manufacturing, processing and distribution, and the increased globalization of the food supply, there always remains the possibility of the emergence of new hazards. One of the challenges for those responsible for protecting the health of the public in relation to food hazards is to have in place a well-developed system of surveillance for foodborne disease as well as a system for the regular monitoring of food for the presence of hazards. At this point, China collects information on 9 types of microbial foodborne disease. Epidemiological investigation of outbreaks is poor. Surveillance of sporadic cases of illness due to microorganisms capable of being transmitted through food is just beginning. UN Agencies have emphasized the importance of surveillance of

the human population, proper epidemiological investigation of outbreaks of foodborne disease, and monitoring of the food supply as providing essential information for risk assessment so that soundly based decisions can be made in managing risk and preventing illness. In addition such information is important in developing broader policies in relation to food safety so that resources can be used most effectively to reduce as far as practicable the burden of risk of foodborne disease on the general population.

Policy implications and actions

Expanding monitoring. Establishing long-term scientific databases is important to obtain information on time trends with regard to human exposures and diseases caused by foodborne agents. Large differences exist in the availability of public resources across China, including those for public health. Compared with other provinces there is a particularly marked lack of resources in the western provinces of China. This has led to fewer monitoring facilities and those that do exist are more poorly equipped and lack technical talent. While national laboratories in China compare favourably with those in many other countries, provincial laboratories do not have the same capability in a number of areas, including the testing for chemical contaminants and food pathogens, fast diagnosis of foodborne diseases or exposure assessment. This difference is more marked for laboratories at the local level.

Strengthening surveillance. China needs to build up its capability to make best use of its health service and public health infrastructure so that it can contribute fully to surveillance, for example, using laboratory reports. In the absence of a sufficiently developed infrastructure that can provide epidemiological information for surveillance purposes, it may be possible to set up “sentinel” surveillance studies to determine the incidence of foodborne disease. This, together with well structured surveys of food, would improve knowledge and understanding of the situation in China and provide a solid basis for development of policy. Foodborne disease outbreaks that should be reported directly to MOH immediately include those (i) occurring in schools and collective dining halls, (ii) where more than 30 persons have been affected, (iii) a death has occurred, and (iv) an outbreak of illness affecting a large number of people without clear reasons.

POLICY NOTE 6: Communication

Key challenges

Education and training. All those involved in the food control system need to have an adequate understanding of the issues. Those working professionally in relation to food, whether as a food handler, food inspector, farmer or government official, need to be appropriately educated and trained. The Government has an important role in educating and increasing the awareness of all stakeholders of the food continuum in respect of food safety. The provision of information for the food industry and other stakeholders is provided by various government departments but frequently without reference to each other's activities. This may undermine the public's confidence in the Government's ability to provide appropriate protection from hazards that may be present in food. The Government should develop appropriate and effective means of communicating with all stakeholders, including the public. The maintenance of the public's confidence in the food they eat is likely to be best achieved if there were within Government a single source of information on food safety and related matters. In order for China to sustain its expanding agricultural sector, an increasing number of people need to be appropriately trained in GAP, GVP, GACP, GMP and GHP as well as specific food matters, such as codes of practices. Increased opportunities for such training will need to be provided by Government. Teaching about food and food safety in schools needs to be reviewed to see if improvements could be made which would generally contribute to the public's knowledge and understanding about food safety matters. These efforts have to be accompanied by practical and effective communication throughout the food continuum from production to consumption...

Information and communication. The effective safeguarding of public health and consumer protection depends on the effective cooperation of all stakeholders, namely Government at all levels, food enterprises, primary producers, consumers and the media. Two-way exchange of information is essential for such cooperation. One important responsibility of a food control system is to provide consumers with adequate, clearly presented information so that they are able to make informed choices regarding the food they eat. The public is best served by a single consistent authoritative source of advice they can trust. Currently there is no mechanism to discuss,

coordinate and agree public statements giving information to the public. In some sensitive and difficult areas, different government departments have sometimes announced different views, advice and actions to be taken by the public. The effect of this can only serve to undermine public confidence in the Government's ability to manage food safety, and possibly causing avoidable illness and even death.

Policy implications and actions

Improving education and training in food safety. Government policy makers and industry practitioners have often lacked the necessary training in food safety. Consumers in general do not have basic food hygiene knowledge. Therefore education and training in schools, colleges and universities, proper use of mass media and modern techniques of distance learning will help increase China's capabilities in respect of food safety. There is a need also to provide opportunities for training at colleges and universities in areas of science and technology relevant to food safety and enforcement. Furthermore the Government could review teaching in schools at all levels to see if any improvements could be made which would, over time, improve the general public's behaviour and understanding of food safety matters. In addition, Government should work closely with academia not only to benefit from the latest knowledge and research within universities but also to develop appropriate curricula for training future food safety professionals for both government and food industry. In this regard, a major effort will need to be undertaken to train a sufficient number of post-graduate level food safety specialists to meet the expanding needs of both the Government and the food industry.

Information and communication. China needs to give attention to providing a single source of reliable advice to consumers regarding food safety and quality. Communication channels with other stakeholders should be opened. Experience of other countries can provide useful examples of how this could be done. Immediate key steps should address the need for a good basic food law and improvements of the organizational arrangements within Government. However, there is the enormous task of changing thinking and attitudes of those engaged in food enterprises to accept that it is their primary responsibility to provide consumers with safe food by controlling risks in their particular products. This will also mean a change in the way food safety enforcement is carried out and as a result, additional relevant training of enforcement officers will also be

needed. Substantial resources will be needed to bring about the changes needed.

POLICY NOTE 7: INTERNATIONAL COOPERATION

Key challenges

International agreements. China has been a member of Codex Alimentarius Commission (CAC) since 1984. With the approval of the State Council, a committee comprised of relevant ministries and commissions was set up to deal with CAC business. The committee is chaired by the MOH with MOA as vice-chair. In 2006 China began hosting two important CAC Committees, namely, the Codex Committee on Food Additives and the Codex Committee on Pesticide Residues. China's increasing involvement with the CAC has signalled a growing recognition of China as both a major exporter and major importer of food commodities. China is also a member of the WTO, which offers advantages but also imposes some restrictions. This includes the SPS Agreement as well as other requirements for promoting harmonization and reducing barriers to trade.

International communication. Since 2000 China has hosted several major international conferences on food safety as well as a number of smaller, but important technical meetings. In particular, China successfully held a Global Food Safety Forum in November 2004 in Beijing attended by 450 participants with more than 120 officials and experts from international organizations and foreign governments. This forum was important in helping the international community understand the situation in China in relation to food safety, as well as contributing towards international communication and cooperation. More recently, in November 2007, the High-Level Food Safety Forum took place in Beijing, which was cosponsored by WHO. The Forum resulted in the Beijing Declaration on Food Safety which, in recalling that access to a safe and nutritionally adequate diet is a right of each individual, urges all countries to undertake a series of improvements to strengthen their national food safety systems. In recent years, China has benefited from a number of international technical cooperation programmes in the food safety area. All these programmes have contributed to improvements in the technological aspects of food safety control and the food safety regulatory system, as well as fostering international cooperation.

Technical cooperation. Countries in the EU and North America have attached great importance to food safety for many years. They have considerable expertise and experience in which China

should share through appropriate training opportunities and exchange programmes. There is still a lot that China needs to do to build up its infrastructure and capacity in relation to food safety. It needs to continue to take advantage of the opportunities available in this area from international agencies FAO, UNDP, UNIDO, UNESCAP and WHO, as well as the OIE in respect of animal health, an area which is relevant to food safety. In addition to the above-mentioned organizations a number of bilateral government agencies have also contributed to capacity building in respect of food safety. The Asian Development Bank (ADB) has provided technical assistance to develop scenarios for institutional reform with emphasis on strengthening food safety legislation, while the World Bank (WB) has focused on strengthening primary production. In the future China should continue to take full advantage of these opportunities to obtain such technical assistance and support.

Policy implications and actions

International agreements. Many developing countries lack the legal, administrative, technical, and other capacities to comply with new or more stringent requirements imposed by international agreements. Inadequate support is available for capacity building in this area, despite the provisions made in the WTO SPS Agreement to provide such assistance. Developing countries, including China, need to closely review the compliance challenges posed by rising private and public SPS standards from developed countries. Food safety risk management should be considered as a core competence in the competitiveness of developing countries, inter alia, in the context of trade in high-value food products. Effective capacities in SPS management are taking on increased importance among the wider set of competitiveness factors. More recently in June 2007 the International Health Regulations of 2005 (IHR (2005)) have come into effect and require specific notification and response on the part of governments to incidents of international public health significance. Under this agreement, food safety incidents must be reported and the International Food Safety Authorities Network (INFOSAN) was established to facilitate communication and assessment of such incidents.

A catalyst for change. Although new and more stringent standards can serve as a trade barrier in the short run, they act more often as a catalyst for progressive change. Stricter standards can provide a stimulus for investments in supply-chain modernization, provide increased incentives for the

adoption of good practices, such as GAP, GVP, GACP, GMP and GHP, leading to better safety and quality control practices in agriculture and food manufacturing. Governments are increasingly adopting a production-to-consumption (farm-to-table) perspective, requiring traceability of the origins of animals, farm products, and raw materials, while national systems for border inspections of food and plants have been scaled up. The complexity of the standards setting for high-value foods is likely to increase in the future given the emerging tendency, especially within the private sector, to combine or integrate safety, quality, environmental and social standards. This evolving set of standards has important implications for developing countries, including China, in the sense that developing country stakeholders participate in standard-setting processes through multilateral and bilateral consultations.

Maximizing strategic options. Given the immense importance attached to the food safety and public health issues at the national, regional and international levels, the Government and the private sector in developing countries should adopt a strategic approach to food safety, agricultural health and trade. Future capacity-building efforts should be geared towards maximizing the strategic options available to both government and the private sector in developing countries when faced with new or more stringent standards. The proactive approach to standards compliance requires that policy-makers, firms, and industry organizations adopt the view that effective SPS management is a core element of overall competitive strategies, and geared toward forging a strategic approach to SPS management and investment for long-term benefits for public health and agro-trade. In conclusion, interventions to strengthen SPS management capacities and the associated investments can contribute to growth, poverty reduction, and the pursuit of national and international public goods. Policy-makers and technical administrators adopt a forward-looking and strategic approach to managing SPS standards and international market access. Finally, recognizing the complexity of SPS management and the potential for SPS-related barriers to regional agro-food trade, collaborate with neighbouring and other regional countries to share and specialize in certain SPS management functions, such as standard setting, accreditation, certification, and testing.

International communication. With the increased globalization of the food supply, food safety issues have become increasingly international. China needs to strengthen its international communication and cooperation in relation to the monitoring, response and handling of possible

food safety incidents. Its ability to do this will depend very much on progress it makes in improving its own surveillance and monitoring arrangements within China. In this regard, the INFOSAN Emergency network and the IHR (2005) are important new initiatives for facilitating international communication during times of emergency. China has become increasingly active in the international community over the past 20 years. In view of its contribution to the international trade in food China must continue to play an active role in the various international organizations dealing with food safety issues. Effective participation in the standard-setting work of the Codex Alimentarius Commission is an essential aspect. China should take advantage of all the opportunities available to improve its knowledge and understanding in this area so that public health and consumer interests are protected both within China and internationally. Vice Premier Madam Wu Yi emphasized this issue in her opening remarks to the High-level International Forum on Food Safety on 26 November 2007.

Technical cooperation. Technical cooperation by UN agencies is directed at relevant government entities that have responsibility for various aspects of the food chain. Such cooperation could take the form of assistance in assessing impact of new measures, particularly in relation to weaknesses found in earlier reviews. The findings of the assessment would lead to recommendations on further improvements to the system. Another initiative might be a national action plan for improving food safety management would be developed that would cover the entire farm-to-table paradigm. In responding to common problems of unacceptable chemical residues and microbiological contamination of agricultural produce associated, in particular, with small-holder production, UN agencies could collaborate in the development of an initiative that focuses on the use of Farmer Field Schools to address the issue of poor agricultural practice.

In addition, a national policy and action plan aimed at improving food safety management in food industries is another area for possible collaboration. The assistance would also cover the development of codes of practice and training programmes for food processors on food safety management and the implementation of other actions, such as implementation of HACCP and HACCP-based systems. Special attention needs to be given to supporting those small-scale businesses that do not have adequate access to resources (human and other) to enable them to independently develop HACCP-based food safety systems. In addition to the international standards of the CAC, the development of regional standards for high value food products can

serve to stimulate better compliance with applicable good practices and codes of practice and assistance can be provided in this area. In addition, relevant UN agencies can provide tailored training to various levels of risk managers, risk assessors and other key stakeholders on risk analysis and its component disciplines. UN agencies could assist the government in reviewing the national food safety emergency response mechanism and related functions in order to ensure that allows for rapid identification and effective response to potential food safety incidents. This complements the FAO/WHO guidelines for the establishment of national food safety emergency response system and the INFOSAN Emergency network under IHR (2005).

Finally, it should be noted that opportunities also exist for technical cooperation between developing countries in food safety, which was advocated by the Beijing Declaration on Food Safety. Among various actions, countries were urged to “expedite the strengthening of food safety capacities through effective cooperation between developing and developed countries as well as among developing countries, thus promoting safer food for all.”