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How regulators support food security and food safety in a pandemic and beyond

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Hello!

I am Colin Christmas.

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Food Security

Risk of hunger is set to almost double acute hunger by end of 2020 as a result of the coronavirus pandemic. World Food Programme (WFP) figures indicate additional 130 million lives and livelihoods will be at risk.¹ Global food systems are complex; population growth is a key factor this means international trade is critical in ensuring global food security.



¹ New WFP figures indicate additional 130 million lives and livelihoods will be at risk
<https://insight.wfp.org/covid-19-will-almost-double-people-in-acute-hunger-by-end-of-2020-59df0c4a8072>

Trade Restrictions

Barriers to trade have increased in recent years, notably in the World Trade Organization (WTO). During a crisis, many countries adopt food policy restrictive measures which include trade restrictions.

Food and Agriculture Organization of the United Nations (FAO) announced a COVID-19 advisory for countries to resist imposing pre-emptive export restrictions as a typical policy response to the health crisis, as this risked an associated food crisis.¹



¹ Global food security in the context of COVID-19: A scenario-based exploratory analysis
<https://www.sciencedirect.com/science/article/pii/S2590061720300570>

Benchmark Policy (Food Security)

Latin America and the Caribbean: Ministers and secretaries of agriculture, livestock production, fishing, food and rural development from 26 countries signed a declaration detailing measures to coordinate the supply of sufficient, safe and nutritious food for the 620 million inhabitants of the region during the COVID-19 pandemic.¹



¹ FAO Regional Office for Latin America and the Caribbean
<http://www.fao.org/americas/noticias/ver/en/c/1269548/>

Food Safety

During the COVID-19 pandemic, there has been a reduction in the number of second-party, third-party audits and regulatory inspections. The consequences are not yet determined. There is often a lag of 12-18 months where food safety requirements are not met over a period of time, or problematic trends without sufficient actions result in major incidents and recalls. Food safety impacts related to the current pandemic will not be measurable until 2022.



Benchmark Policy (Food Safety)

Regulators responded by adopting information and communication technology (ICT)¹ methods for remote food safety inspections during the pandemic. Examples include The United States Food and Drug Administration (FDA) remote importer inspections under Foreign Supplier Verification Program (FSVP),² Department of Primary Industries (DPI) in New Zealand, Victoria Department of Health, Australia and Human Services & New South Wales Food Authority, Australia, all conducting remote inspections.



¹ IAF MD 4:2018 The Use of Information and Communication Technology (ICT)
<https://www.iaf.nu/upFiles/IAF%20MD4%20Issue%202%2003072018.pdf>

² FDA To Temporarily Conduct Remote Importer Inspections Under FSVP Due to COVID-19

<https://www.fda.gov/food/cfsan-constituent-updates/fda-temporarily-conduct-remote-importer-inspections-under-fsvp-due-covid-19>

Beyond the Pandemic

Regulators need to work collaboratively, adopting a process-based approach, writing public policy with reference to international voluntary consensus-based standards, using the Committee on Conformity Assessment (CASCO) toolbox.¹ CASCO is the ISO committee that works on issues relating to conformity assessment.



¹ Conformity Assessment tools to support public policy
https://www.iso.org/sites/cascoregulators/02_casco_toolbox.html

Process Approach

Regulators must adopt a process approach.¹ Food manufacturing is a process industry. It is about ingredients, not parts. It is formulas, not bills of material. It is about bulk materials, not individual units.

“Complying Product has to come from a process to comply. You cannot inspect a product to comply, it has to be produced to comply.”²

Steve Olson, United States Department of Agriculture (USDA).



¹ The Process Approach in ISO 9001:2015 <https://www.iso.org/files/live/sites/isoorg/files/archive/pdf/en/iso9001-2015-process-appr.pdf>

² Food Safety in the Supply Chain (Steve Olson, USDA quote, 14m00s) <https://www.youtube.com/watch?v=y5PjEOARGy8>

Definitions of Standards

- ▶ “*Voluntary consensus standards*” are standards developed or adopted by voluntary consensus standards bodies, both domestic and international.¹
- ▶ “*Industry standards*” are standards developed in the private sector but not in the full consensus process,¹ typically requiring a financial contribution (e.g. standard owner fees).
- ▶ “*Government standards*” are standards developed by the government for its own uses.¹



¹ Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities
<https://www.whitehouse.gov/wp-content/uploads/2017/11/Circular-119-1.pdf>

Importance

Regulators are often instructed by their government offices to adopt “*voluntary consensus standards*” before relying upon “*industry standards*” and or developing “*government*” standards.



Example

International Organization for Standardization (ISO) is an independent, non-governmental organization developing voluntary, consensus-based, International Standards. With a membership of 165 national standards bodies, each member represents ISO in its country. In comparison to industry standards, individuals or companies cannot become ISO members.

ISO/TC 34 represents Food Products,¹ and ISO/TC 34/SC 17 represents Management Systems for Food Safety.²



¹ ISO/TC 34 Food products <https://www.iso.org/committee/47858.html>

² ISO/TC 34/SC 17 Management systems for food safety <https://www.iso.org/committee/583916.html>

Outcome Focused

International voluntary consensus standards are designed to have global range which are “*outcome focused*”.¹ What factors need to be considered and what results need to be achieved.

Regulators can reference these standards to translate internationally accepted criteria into public policy.



¹ Private Food Safety Standards: Their Role in Food Safety Regulation and their Impact
<http://www.fao.org/3/ap236e/ap236e.pdf>

Common Vocabulary

FDA defines a *“Preventive Controls Qualified Individual (PCQI)”* in their Final Rule for Preventive Controls for Human Food.¹ In comparison, ISO 22000, as a voluntary consensus standard with just under 40,000 certified sites globally,² defines this as a *“Food Safety Team Leader”*.

Did this result in redundant training and a redundant PCQI qualification to meet FDA requirements?



¹ FSMA Final Rule for Preventive Controls for Human Food
<https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-preventive-controls-human-food>

² The ISO Survey (39,651 sites for ISO 22000 in 2019)
<https://www.iso.org/the-iso-survey.html>

Impact

When regulators write public policy without reference to voluntary consensus standards there is no common language between the public and private sectors. This results in teams of lawyers being hired to translate what regulatory requirements mean to industry.

Without an international reference point, inefficiencies and unnecessary costs are a burden to the food industry.



Benchmark Programs (Regulators)

International Medical Device Regulators Forum (IMDRF) and the Medical Device Single Audit Program (MDSAP)¹ uses a voluntary consensus standard, ISO 13485. This includes regulatory authorities in Australia, Brazil, Canada, China, Europe, Japan, Russia, Singapore, South Korea and United States.

ISO Standards supporting public policy for environmental management; including energy (ISO 50001), environmental impacts (ISO 14001) and greenhouse gases (ISO 14064 & ISO 14065).²



¹ International Medical Device Regulators Forum <http://www.imdrf.org/workitems/wi-mdsap.asp>

² Environmental Management <https://policy.iso.org/environmental-management.html>

Conclusion

Food and environmental regulators need to work together by referencing voluntary consensus standards. With a world population of 7.8 billion in 2020 and projected to reach 9.9 billion by 2050, we need to strengthen our global food systems and remove barriers to trade. A stronger food system does not come without consideration to the environment, ecosystems and biodiversity. ISO standards are designed to support public policy and more importantly, they are designed for integration with a common vocabulary. This enables common ways of working for all regulators.



The Global Food Security Index

Explore the Index

 Country profiles

 Key findings

 Rankings & trends

Indexing three core issues in 113 countries with an optional risk adjustment factor:

 Affordability

 Availability

 Quality and Safety

 Natural resources and resilience

Core index issues

Risk factor



Public Sector Assurance Benefits



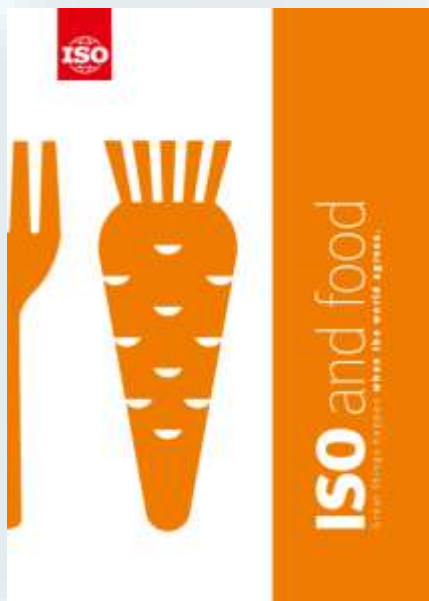
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Voluntary Consensus Standards and CASCO Toolbox



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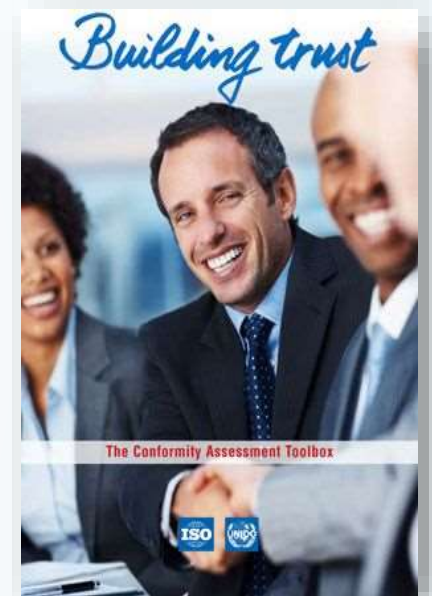
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Thank you!

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