



2009 Pan-African AFRITrace Conference

Held in Nairobi, Kenya, from 13th – 15th October 2009

These notes summarise the proceedings and discussions at the AFRITrace 2009 conference and workshops, which took place from 13th – 15th October 2009 at the Red Court Hotel in Nairobi, Kenya. The theme of the conference was “Adding Value for Consumers and Suppliers – Where to now for Food Safety and Traceability?” The conference was timed to coincide with the UNIDO Food Safety Week.

UNIDO sponsored the conference, TraceSoft Limited and SGS were co-sponsors and the conference was organised by In-Sync Limited. Participants represented governments, industries, standards bodies and private sector companies from Ghana, Kenya, South Africa, Tanzania and Uganda.

The programme was assessed to be interesting and well balanced. There was good participation and delegates expressed appreciation that the programme allowed time for discussion and workshops were not run concurrently. Copies of presentations were issued to participants after the proceedings.

These notes describe the contents of presentations, give a synthesis of the themes and key points, and make suggestions regarding the way forward. Whilst the notes reflect a snapshot of the discussions at AFRITrace 2009, they also provide a basis to further the debate within East Africa on food safety and traceability. The notes are a collaborative effort, coordinated by Rosemary Amondi from TraceSoft. Comments and suggestions are welcomed. Rosemary’s contact details are provided on the last page.

CONFERENCE OPENING SESSION

John Sawers (*CEO of In-Sync Limited*) welcomed participants and thanked the sponsors.

Andrew Edewa (*National Coordinator, Trade Capacity Building, UNIDO Kenya*) introduced the UNIDO programme in East Africa and stressed the importance of the private sector in Food Safety.

Alexander Varghese (*UNIDO Representative, Kenya and Eritrea*) discussed the farm to table continuum, which involves all role-players including government officials, agriculture, food control agencies and educational institutions. Food safety is an ever-present threat and food borne diseases have both economic and personal consequences. It is vital to provide balanced information to consumers and have an effective education programme. The approach to food safety is largely reactive – a risk-based approach would be preferable. The UNIDO programme is multi-faceted and includes a support centre, engaging with government, trade unions and researchers, and supporting infrastructure development.

The Opening Address, delivered by Mark K. Bor (*EBS, Permanent Secretary, Ministry of Public Health & Sanitation*) stressed the importance of the event.

The Keynote Paper was delivered by Gladys Maina (*Managing Director of the Pest Control Products Board; Alternate chair for the National Food Safety Coordinating Committee*). Kenya has a strong domestic market - only 4% of agricultural production is exported. The value of horticultural exports is about US \$1 billion (KES 74 billion) per annum. Food safety is influenced by challenges facing the region, the changing requirements of international markets, the multiplicity of standards, the importance of traceability, and the need for a National Food Safety Control System and quality control standards. The focus must be to build capacity with regard to good safety. Implementing the controls and processes is expensive and major producers drop smallholders. These issues must be addressed together. Kenya has a multi-sectoral approach to food safety involving many government departments, which complicates establishment of a National Food Safety Control System. There must be liaison between government and e.g. the National Horticultural Task Force and National Codex Coordinating Committee. Achievements so far include establishing a focal point, building relationships with relevant departments, a draft National Food Safety Policy, the National Food Safety Coordination Committee, and a National Food Safety Plan. The National Food Safety Coordination Committee is chaired by Ministry of Agriculture. Public Health provides the Secretariat.

CONFERENCE PRESENTATIONS

“Quality Issues With Regard to Food Safety” (*Gwynne Foster, Traceability Projects, Consumer Goods Council of South Africa*) “Quality” is taken to be a subjective term relating to the expectations of the customer, and “food safety” the safeguarding or protection of food from anything that could harm consumers’ health. The presentation considered the changing face of agriculture and the increasing impact of the supply chain and customers on production; challenges e.g. keeping products “fresh” for longer and during transport and storage; keeping track of where products came from and where they went; knowing what happened on the farm; being able to quickly find out where products are; and taking relevant action if there is a problem. There are many interdependencies between quality and food safety. The scope of interest of agricultural standards is increasing, requirements are becoming more demanding, and specific markets have specific requirements. Considerations extend to water footprint, the authenticity of pharmaceutical products, the legality of fishery products, and apply precision livestock farming (PLF)¹. One off the major challenges to meeting market requirements is getting, from source, quality data that is accurate, complete, timely and accessible.

“Creating consumer and business value from traceability systems” (*Rosemary Amondi, Managing Director, Tracesoft Ltd. Kenya*) International consumers are concerned about many issues in addition to quality of a product, such as the sustainability of production and harvesting methods, health matters working conditions of employees, animal welfare and whether a product might be sourced more cheaply on the Internet, which in turn gives rise to the authenticity of products, false declarations on labels and so on. Research shows that up to 90% of the information being documented as products flow through the supply chain does not follow the products when they move from one step to another. Challenges for producer countries include low investment in IT (information technology) solutions supporting business processes and business administration, and sales through middlemen and external auctions, where the producers and trade are remote from the real consumer, companies trading in the products do not participate in brand building and even high value products end up selling for low prices in “mainstream” markets. Positive trends include African producers looking for opportunities to sell directly to import markets, and buyers in Europe and USA are looking to build direct-supply relationships with producers in order to be secure about origin and quality, and to build new brands.

The Global Traceability Network (GTNet) supports internal traceability (within an enterprise) and external traceability (through the supply chain). Examples were given of benefits achieved with traceability systems internationally and in East Africa. Current projects include demonstrating compliance with a new EU IUU (illegal unrecorded and unregulated) fish rule that takes effect in January 2010, counterfeit management for medical supplies, and initiatives to build brands. There could be benefits in adopting a common national platform, having a one-stop information point and using global standards of identification/bar coding (the GS1 system).

“Food Products Traceability Systems Essential for Achieving Food Safety Standards in the EAC” (*Andrei Koval, SGS, Kenya*) SGS is a global inspection, verification, testing and certification company, with extensive experience and expertise throughout the fresh produce supply chain. Services include an identity preservation programme and traceability. SGS is an accredited certifying body for most popular standards including the new FSSC22000 standard.

Examples of tracking applications include monitoring of conditions of perishable cargo and prevention of genetically modified organisms (GMOs) from entering the supply chain from field to the vessel. “FarmLink24”, which is being implemented at the Joburg Market (South Africa), is an example of SGS information services. FarmLink24 is a new online information system for producers, agents, JoBurg Market, and SGS to manage market deliveries, receiving and sales activity.

¹ Precision Livestock Farming (PLF) is a subset of Agricultural Engineering that applies technology to the practices of sustainable animal production. *Sensor technology* could immediately indicate conditions such as stress or suspected disease, which can aid sustainable animal production through demonstrable animal welfare, predictable product quality and improved profitability. An EU project, “BrightAnimal”, is reviewing the status of PLF research for dairy cattle, pigs, laying hens and aquaculture, with a view to assessing the impact on and benefit for producers. South Africa is participating in the project and Gwynne Foster will coordinate the South(ern) African network.

“Livestock Traceability Systems in East Africa” (*Dr Peter Ithodeka, Director of Veterinary Services, Ministry of Livestock, Kenya*) Traceability is the ability to follow an animal or group of animals during all stages of its life. Product tracing is the ability to follow the movement of a food through specified stages of production, processing and distribution. The details of each movement are recorded. Improved record keeping systems and increase in available information are of value for disease surveillance, tracking stolen animals, accessing export markets, responsible production, and to support national policies and activities. Types of identification include mechanical, electronic and biometric methods.

Livestock is a critical resource in East Africa, involving 40 million heads of cattle, over 60 million sheep and goats and 120 million people. Identification of animals is not new - the Branding of Stock Act, CAP357, has been in force in Kenya since 1907. However, the existing identification system cannot meet emerging global standards of identification and traceability.

In 2007, the government of Kenya initiated a pilot study on national animal id and traceability for cattle using LITS (Livestock Identification and Traceability System). The solution needed to suit Kenya's production systems, be based on the 'real world', be affordable and effective, and be consistent with OIE standards. Challenges include implementing systems at producer level in pastoral settings; resources constraints; the policy environment; and cultural and religious values. Preliminary results indicate that there are benefits to electronic animal identification methods in livestock identification. The decision to adopt cattle traceability will be based on a Benefit-Cost analysis which is being finalized.

In addition, the Institute for Security Studies (ISS) wants to advance human security through combating cattle rustling in Eastern Africa.

The EAC needs a regional approach to animal identification and traceability policy. Kenya is preparing to entrench in law the use of a national identification and traceability system. Tanzania has laws in place and is in the process of implementation. Other EAC countries are making efforts. Veterinary services and partners in the public and private sector play a key role in implementation.

“Food Safety Audits - Their Role in the Application of Food Safety Standards. What does it mean for those operating in the Food Chain?” (*Beatrice Opiyo, Head of Food Safety Audit, KEBS*) Global food supply chains are complex. Processors implementing food safety management systems help to reduce incidence of food borne disease and spoilage; reduce insurable liability; reduce legal tussles; ensure supply of safe food; allow or improve access to markets; and show due diligence and duty of care at company level. A comprehensive, 'farm-to-fork' supply chain approach to food safety is needed.

Relevant standards include: ISO22000:2005 (food safety in organizations that produce, manufacture, handle, or supply food or feed); Hazard Analysis and Critical Control Points (HACCP; a systematic preventive approach to food safety by addressing physical, chemical and biological hazards); British Retail Consortium (BRC; for companies that supply retailer-branded food products); Safe Quality Food (SQF; certifies that a supplier's food safety and quality management system complies with international and domestic food safety regulations); International Food Standard (IFS; an admission ticket to retail trade in Germany and France and certain neighbouring countries; and Global Partnership for Good Agricultural Practices (GLOBALGAP).

“Certification” is when an accredited external Certification Body issues an organisation with a mark, licence, certificate, etc to confirm that products, processes, systems conform to certain standards. Third party audits act as the industry's self control model, and complement the governmental regulatory controls and inspections.

“One Year Later – Facing the Challenges of Traceability in the Fresh Produce Sector.” (*Jacqueline Mkindi, Chief Executive Officer, Tanzania Horticultural Association*) TAHA's main objectives are to promote the horticultural industry in Tanzania and create a favourable environment for investors. TAHA has 110 members scattered in all the horticultural production zones in Tanzania. The Tanzanian horticultural sector has grown from US\$45m in 2005 to US\$150m in 2008.

Changes are occurring in the sector on the back of TAHA's activities; financial support from Government; interventions by development partners; new investments; an expanding local hotel industry (17 new hotels have opened in Arusha); Kilimanjaro International Airport; and strong networking with key stakeholders and their initiatives.

The traceability system for fruit and vegetables has improved. Growers are more organized and operate in legal entities (cooperatives). Flow of information from exporters to growers groups has improved. There

are capacity building programmes, certification of grower groups and strengthening of the inspectorate system in the industry. Traceability systems are well established in some sectors, e.g. in the fresh fruit industry. Challenges include limited capacity of small growers to conform to market standards; multiple standards, which have resource implications; infrastructural constraints and lack of financial and technical resources. The industry appreciates the advantages of a traceability system and supports private standards where buyers set minimum requirements for growers, but does not agree with generic standards where the levels are considered too high. Growers must understand why they must keep records, and ongoing capacity building is needed. It is time to harmonize some of the standards and also to participate in standards establishment processes.

Showcase presentation, UAP Insurance (*Florence Kimani, UAP Nairobi*) UAP has operated in Kenya for over 80 years, and also operates in Uganda and South Sudan. Agricultural insurance is designed to protect companies against economic risks, social/political risks and natural risks. Different classes of agriculture insurance cover annual and perennial field crops; horticulture and floriculture; aquaculture; livestock and poultry; and tree crops. Risks threatening crops include excessive rainfall, drought, hail stones, pests and diseases, wind storm and fire. Risks threatening livestock include epidemics, pregnancy, accidents, theft, pests and diseases, unproductiveness and condemnation. Risk mitigation strategies are to avoid the risk, minimize the risk, retain the risk, or transfer the risk by Insurance. UAP agricultural insurance does not presently cater for consequential loss.

“Enforcing the Standards – Fair Game in Kenya as no Food Authority Exists” (*Robert Kilonzo, National Food Safety Committee; Food Safety Division, Kenya Ministry of Public Health & Sanitation*) The national food safety system in Kenya is managed by various agencies under different ministries and laws, with the ultimate aim of promoting public health, protecting the consumer against health hazards and enhancing economic development. The principles adopted for food safety are:

- Cover the whole food chain from primary production to the final consumer (“Farm to Fork”);
- Apply risk analysis principles and give priority to the greatest health risks;
- Improve the follow-up and reporting of food-borne disease;
- Functional separation between risk assessment and risk management, but ensure that there is good communication and contact between risk assessors and risk managers;
- Apply precautionary principle;
- Give producers, processors and traders responsibility for food safety and require that they have internal control programmes based on Hazard Analysis Critical Control Point (HACCP) principles;
- Ensure that systems to trace food and feed back and forth in the chain are in place (Traceability);
- Producers and processors should apply Good Agricultural Practices, Good Manufacturing Practices and Good Hygienic Practices, etc.;
- Close co-operation between agencies responsible for food/feed, medicines, chemicals, animal health, medical services, environmental protection, etc.
- Clear lines of responsibility and, where applicable, vertical integration/co-operation between central, regional and local supervisory authorities.

ISO 22005:2007 “Traceability in the feed and food chain – General principles and basic requirements for system design and implementation” gives principles and specifies basic requirements for the design and implementation of a feed and food traceability system. Supply chains that target the export market and the medium to high-income consumers have elaborate food safety management systems. However most players along the food chain have not established traceability systems and there *may* be a perception that this is the responsibility of government agencies.

Kenya has established a National Food Safety Coordination Committee (NFSCC). The Ministry of Agriculture chairs the Committee, and Ministry of Public Health and Sanitation provides the Secretariat.

“GS1 Contribution to Global Traceability and Food Safety” (*Joseph Nyongesa, GS1 Kenya*) The GS1 System provides for the use of unambiguous numbers to identify goods, services, assets, and locations worldwide. In addition to providing unique identification numbers, the GS1 System provides for supplementary information such as best before dates, serial numbers, and batch numbers. To enable automated identification and electronic recording, the numbers can be represented in bar code symbols and radio

“Adding Value for Consumers and Suppliers – Where to now for Food Safety and Traceability?”

AFRITrace 2009, Nairobi, Kenya, 13th – 15th October 2009

frequency tags. The system is designed to overcome the limitations of using proprietary coding systems, and to make trading much more efficient and responsive to customers.

The 12-member GS1 Kenya Board represents a number of trade and industry associations. The board members have diverse experiences and skills are invaluable in determining and reviewing strategy, annual operational plans and budgets, while ensuring proper audit functions and legal compliance. GS1 Kenya Management Team heads up the different operational elements within the organization which address bar coding, electronic commerce, data synchronisation and radio frequency identification.

“International Food Safety Standards - How far must the EAC go to comply?” (*John Nyagah, SGS*) Food safety is driven by customers and consumers, food borne illness incidents, regulatory bodies, World Health Organization (Codex), market access, shareholders, insurers, retailers and brand protection. There are a proliferation of standards and related requirements for certification. The value proposition/benefits of certification include heightened reputation, reduced risks, competitive advantage, reduced costs, increased efficiency and evidence of compliance. Farm to Fork scope includes Primary producers, Feed Producers, Food manufacturers, Transportation, Storage operations, Food services outlets,... as well as Packing materials, Cleaning agents, Additives and ingredients, Services providers, Producers of equipment, ...

The key questions to consider are:

- How strong are our Institutions? Where do they reach? Any national food authority arm?
- Is there single or harmonious food safety law? Policy formulation?
- How much awareness exists in the market?
- Are the investment costs fair and reachable to majority?
- Do we know where to get support from Government and donors?
- Are there any SME strategies to reach lower in the supply chain scope?
- How do we deal with the multiplicity of food safety audits and speed up standards compliance?

Critical success factors for safer food, more market access and better businesses are a strong commitment by EAC Government Associations to the food supply chain, increased awareness, cooperation between stakeholders, Strong local accreditation, certification, training and consultancy institutions, and networking with international institutions. Achieving Food Safety will take commitment, time and resources. There is benefit in integrated Food Safety Management System Certification.

“Quality Infrastructure for Food Safety and SPS Compliance” (*Andrew Edewa, National Coordinator, Trade Capacity Building, UNIDO Kenya*) UNIDO has identified 3 problem areas that require assistance to enable the expansion and competitiveness of exports from developing countries.

- The lack of marketable products for exports
- The lack of capacity to conform to international standards
- The lack of information on rules of trade, markets and procedures to connect with export markets.

The presentation discussed the World Trade Organisation (WTO), the Sanitary (human and animal safety) and Phytosanitary (plant safety) standards (SPS) and Technical Barriers to Trade (TBT) Agreements, and the respective responsibilities of government and the private sector. SPS compliance is requisite for agro-industrial exports from developing countries.

The institutional frameworks in Kenya do not yet adequately link policy formulation across the different sectors, leading to increased SPS incidences and notifications. There is limited understanding of SPS standards and measures and how these differ from technical barriers to trade. There are multiple National Coordination Committees on TBT and SPS matters. There is a need for a whole value chain assurance by all actors. And there is a need for significant institutional reform and/or adjustment.

Recommendations regarding how to approach food safety were discussed.

Adopting a “farm to fork” approach” would result in more integrated legislation; stricter legislation in the context of safety; improved control activities; improved information system e.g. for rapid alerts, and improved transparency, better public information and labelling, with ethical interests respected.

“How the Kenyan Dairy Industry is Meeting Standards” (*Joyce M. Kiiro, Kenya Dairy Board*) Milk production in Kenya is about 4.2 billion litres per annum, over 80% of which is cow milk. Volumes of processed milk grew by 190% between 2002 and 2007, which is attributed to intervention measures by Government. A drop in production in 2008 is attributed to effects of post election violence. There was no significant

improvement in 2009 due to prolonged drought. Smallholders produce over 90% of the milk. There are close to 1 million producers. Production relies on rain-fed agriculture which results in seasonal fluctuations. Milk surpluses are experienced in July and December, with shortages in January to March. There are 3.5 million dairy cattle of an estimated total cattle population of 13.5 million.

70% of the total milk is marketed informally. The formal sector is made up of processors, mini/cottage dairies and milk bars. There are 33 active milk processors with an installed daily processing capacity of 3.0 M litres. Current utilization stands at 1.3 M litres per day. Industry produces a variety of dairy products – Pasteurized milk, UHT milk, milk powder, Butter, Cheese, Ice cream, ghee etc. Kenya changed from a net importer of dairy products to exporter in 2003. Leading destinations are the EAC and COMESA regions. Products exported include – UHT milk, milk powder, cheese and butter.

Milk, more than most other foods, is a primary single source of those dietary elements needed for the maintenance of proper health especially in children and older people. It also has the potential to serve as a vehicle of disease, and has been associated with disease outbreaks of major proportions. It boils down to how it was produced, handled and packaged. The industry has put in place structures to ensure the industry produces quality and safe products, which include:

- Policy and Regulatory Mechanisms: The Kenya Dairy Board is a statutory body established in 1958 through an Act of Parliament, the Dairy Industry Act (presently under review) and Cap 336. Its mandate is to regulate, develop and promote the Dairy industry in Kenya. To ensure the safety of marketed milk, Kenya Dairy Board has 34 gazetted and well qualified dairy inspectors stationed at the various KDB branches spread across the country.
- Standards development: Currently 77 industry standards have been harmonised at adopted at the EAC level, addressing product specifications and test methods. Kenya has further developed a code of practice for the industry and a GMP standard. Training programmes, based on the two standards, are available for industry players.

The private sector involvement in milk quality and safety includes:

- Cooling networks infrastructure
- Processing and value addition: Milk processors in Kenya have invested in world class milk processing equipment, designed to ensure total destruction of any micro-organisms in milk. Some dairy plants have achieved ISO/HACCP certifications and many are pursuing these certifications.
- Laboratories, milk testing and analyses: Each milk processing plant has an onsite laboratory which analyzes samples of the final product for every batch produced. Only products which have been found to be compliant by the laboratory are released to the market. An external laboratory confirms results obtained at the plant level. External Laboratories also conduct other analytical tests that are not done at the plant. Records of the results are checked by KDB inspectors. One of the private laboratories recently achieved ISO 17025 certification, making its results admissible internationally.
- Milk traceability: The Board is setting up an e-dairy information system in collaboration with a private IT company. Key features in the system include: Registration of the animals; Farmer registration; Milk transport vehicles; Traceability at the processing centre; and Packaging with barcodes that give information on the product source. A pilot is in progress.
- PPP Initiative in stakeholder trainings: Kenya Dairy Board identifies private business service providers, with a capacity to train farmers on milk handling and small scale milk handlers on value addition. This initiative will enhance availability of extension service to industry stakeholders. Close to 200 service providers have been registered countrywide.

Challenges in milk quality management: Adoption of hygienic milking practices at the farm level; Delays in milk bulking, collection and transportation due to the poor road infrastructure; Use of inappropriate milk handling equipment; Limited access to milk testing facilities especially in small scale handling premises; Producer payment based on volume and not quality; Low levels of milk production leading to traceability challenges; and Quality and safety of animal feeds.

Nevertheless, the industry has made significant progress in terms of development and milk quality management, there are concerted efforts between the government and the private sector to further enhance level of compliance, and the Dairy Industry Act currently under review to strengthen enforcement and make it more relevant in a liberalised industry.

“Adding Value for Consumers and Suppliers – Where to now for Food Safety and Traceability?”

AFRITrace 2009, Nairobi, Kenya, 13th – 15th October 2009

“Affordable Traceability Systems - Balancing the Cost vs. the Efficacy” *(Gwynne Foster, CGCSA)*

Achieving traceability requires each food business operator to: Identify and record the food and its components; Identify and record relevant locations and parties; Identify and record treatments and processes; Record movements of products; When needed, recreate what happened from records; As required by use and scope (food safety data requirements and records differ from those for organic products, fair trade and carbon footprint).

Many small-scale farmers do not have the capacity to meet record keeping requirements of food safety and traceability. Even where the farmers understand the importance of standards and record keeping, they often have too little time and not enough resources to achieve what is needed. CGCSA, through the South African Fresh Produce Traceability Project, is exploring the concept of a “traceability services centre” to support small-scale farmers. The aim is to service the farmers with regard to traceability, record keeping, document management and systems, by building supportive capacity within families and local communities. The initiative is a case study for the application of GS1 coding at farm level.

Key considerations from the exercise include: The scope and potential of traceability and traceability systems are increasing; a farm interacts with multiple data points and hence must be in a position to manage and exchange data in different formats; and there are dangers in assuming that each farm and each person have the same understanding and needs. The case study is ready to come off the drawing board. To commercialise the service and roll out on a broader scale, it will be necessary to standardise traceability analysis methods, formalise traceability profiling techniques, establish a traceability profiling service, develop cost-of-change models, and so on.

Postscript: Since AFRITrace, it has been agreed that CGCSA will end its support for the traceability services centre in February 2010. The focus of CGCSA traceability research will switch to the EC BrightAnimal project. Discussions are underway regarding the commercialisation of the services centre.

“Kenyan exports: Road to compliance / lessons from Kenya Good Agricultural Practice code” *(Ms Zippora Kiruthu, FPEAK)*

“Applying National Standards & Private Standards in the EAC” *(Margaret Alete, Kenya Bureau of Standards)*

WORKSHOPS AND CONCLUSIONS

Day 3 allowed participation in workshops, followed by a brief summing up of key points. The following workshop topics were posed:

1. The Role of Traceability in Improving Confidence in Trade.
What are the benefits derived from Traceability Systems, so that growers can confidently provide foodstuffs that buyers know will meet international standards?
2. The Role of Government in Food Safety.
How much regulation is required and how will it be applied? What are the mechanisms for enforcing compliance? Will EAC legislation be de facto the legislation for each member state?
3. What Are The Drivers for Food Safety?
Where are the key points of control along the food supply chain?
4. Food Safety Regulatory Framework.
Discussion the legislation that will affect Hotels, Restaurants, Kitchens, Food Retailers.
5. Food Safety Actors along the Food Chain – The Private Sector Profile.
What role will the private sector play in ensuring Food Safety Legislation Compliance?
6. The Wholechain Approach Continuum.
Where Are We Now and Where Are We Going? What Needs to be Done?

The following conclusions and actions resulted from the discussions.

- Be proactive on creating greater awareness at all levels.
- Identify and address cross-cutting challenges.
- Develop action plans for food safety and traceability.
- Plan and execute a Food Safety campaign - the public must wake up.
- Generate research-based data - What are the most common challenges with food safety?
- Partner with the media.
- Operate as a team (participants and their organisations).
- Take a project approach (What by when? / Focus on the end goal).
- Don't run a project from a line management position (line objectives conflict with project change).
- Companies to commit to contribute financially.
- Form a Food Safety Steering Committee to spearhead the activities and formulate resolutions and action plans. (Names of volunteers / Members to elect Chair and Secretary / TraceSoft would be happy to host the initial meeting).
- Take the initiative forward nationally and regionally.
- Encompass and incorporate many forums / use these to push the food safety agenda.
- Formulate a joint communication, signed by interested parties, that includes the AFRITrace conference report and a list of participants. Send this to stakeholders and labour, asking "How could you contribute?" / "What other suggestions?" / "Who else should participate?"
- Develop a proposal for an East Africa Food Safety Workgroup.

POINTS RAISED DURING DISCUSSIONS

The workshops were run as plenary sessions, and discussions relating to the topics overlapped workshop boundaries. The notes of the discussions have thus been consolidated under themes. The notes simply list the key points and do not interpret the meaning or draw conclusions. There might therefore be contradictory opinions, or similar statements worded differently.

1. Food safety:

“Adding Value for Consumers and Suppliers – Where to now for Food Safety and Traceability?”

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Food safety and consumer health are universal concerns. Food safety is food and security, and food security is a human right. Safety is not negotiable. If people are hungry, safety doesn't come into the picture. Quality is the driver (referred to tea). Locals are not just selling produce – they should also promote safety. Start with premise that "quality is free" - some sectors lose up to 40% because of poor handling. What is "Safe"? How do we achieve "safe"?

2. Standards:

There is a confusion of standards. Quantify benefits from standards. Make standards accessible - spec sheets, photos etc². Introduce a mandatory standard e.g. HACCP for all food businesses. Implement HACCP at all levels. "Having ISO22000 has improved exports".

3. Consumer:

What is the role of the consumer in food safety? Where is there consumer protection? Consumers must be vigilant. Provide good value and safe food to consumers - we are as important as overseas consumers! Quality has its price - the European consumer doesn't want to pay more. Will an informed local consumer pay more? Enlightened consumers are willing to pay more! Assume the average consumer is aware of the issues. Consumers have a short memory (e.g. stopped eating meat when Rift Valley Fever first broke out – now don't even think about eating meat). The customer/consumer pays into the chain and deserves protection.

4. Regulatory environment:

4.1 What: Essential governance is made of i) Regulation and ii) Inspections. Food safety is a function of regulatory control. Focus to the basics of handling and processing from production to consumer. Inspection of food premises is paramount. Regulation guides inspectors. Differentiate between technical regulations and standards. We need a safety regulation framework. We don't have a framework – It might be better to start with a policy that addresses technical requirements. Legislation on food safety should be in place. Apply deterrent measures. Identify and address cross-cutting challenges. Corruption needs to be looked at

4.2 Who:

- Government sets the framework for the private sector to do the job. No single authority is accountable for the food safety system. Current regulations are developed and managed across multiple ministries and enforcers. Harmonise regulations and bring them under a single point of control. There are many parties involved; public vs private sector; industry; NGOs. Identify the leaders. Be clear about government's role and responsibilities. Public Health should lead the way - Public Health Laboratories play an important role. The Department of Inland Services is the Regulator of human and animal health, and controls access to market.
- Make use of the National Quality Institute.
- Kenya Bureau of Standards: KEBS develops standards but enforcement lies elsewhere. The KEBS quality mark is easily counterfeited. KEBS doesn't guarantee quality or safety. Penalties are too small - Prosecutions are not a deterrent, and perpetrators think it is a joke. Must take action if serious about addressing the problems.
- National Food Safety Coordinating Committee: NFSCC has no legal standing. Government must involve the private sector in NFSCC. Put NFSCC in charge of infrastructure?
- Kenya Allied Industries Association: Minimum requirements; third party; hotels etc. Ensure production of safe food!
- Research institutes: What does industry need in term of traceability research? What role do research institutes play?
- GS1: Using GS1 standards enables access to wider markets. GS1 Kenya and KEBS (are working together, sharing knowledge. GS1 Kenya could support EAC on product safety. What is GS1's role?
- UNIDO: UNIDO - Guidelines. National coordination role. Works with everyone

4.3 How: Analyse threats and consequences - Take a risk-based approach. Define the requirements and let authorities check that that is what is happening. Need a level playing field with respect to enforcement (e.g. juices - no enforcement). Inspection - consistent expectations and assessments. Urgent need for capacity building for regulators so that they know what's happening. Rate of change is

² Look at the draft GlobalGAP smallholder standards!

high - will need tenacity. Encourage government to move more quickly. Regulators must allow time for regulations to be implemented. Consumers trust that info given on labels is accurate - bring in penalties for wrong information! Develop national traceability infrastructure? Consider incentives? The Israelis insist on cooperative societies - could do that in Kenya as well? Be careful of privatization! Funding food safety is always a challenge – should this come from government? Request governments in Africa to invest more in food safety.

4.4 Control / system: Regular control - not just reactive! Risk factors rather than control issues. Frameworks for inspection of equipment (sterilizers, pasteurizers). Food control systems – opportunities for public-private partnerships? Must be flexible and responsive

5. Exports vs local

Farm to table. Farm to time of consumption! Different markets have different levels of sophistication. Improving standards for exports will also benefit the local market. Not able to access the global village without accessing local market. Target the local market. How does this apply to imports?

6. Supply chain / Value chain

The customer is the only one who puts money into the system. Identify drivers of value in the chain – include services providers. All players have a role to play and responsibilities. Don't rely on end-product testing to catch everything - take a supply chain approach. Identify the points of control along the whole food supply chain. Clarify the role of laboratories. Increase role of private laboratories and certifying bodies. Consider the position of smallholder. Improve domestic market infrastructure. Engage with NGOs. Engage with development partners. Traceability facilitates access to markets (tea). Role of the retailer vs the chain? Exporters are organised - Link with exporters. Involve FMCGs, Kenya Association of Manufacturers. Imports?

7. Private sector

The private sector is driven by Image and Economics. The private sector has a moral obligation and legal duty to act responsibly with regard to food safety. Parents play a key role. Profit drives the private sector. Private sector doesn't just look at profits - Gives back to society.

8. Information

A general lack of sector management systems / data management systems / software. Illiteracy is an issue. Traceability tools must be affordable. Use a web platform for food safety. Share information and food safety records. How can we check the integrity of traceability information / information on labels? Systems are a challenge for small-scale growers. Consider networking extension services?

9. Awareness

The chain ends when the food is eaten. Education/awareness needed on food storage, handling and preparation. Train on hazards (chemical / physical / biological). Include instruments / utensils. Send a clear need and common message. If the food is right then no need for medicine – Teach people the value of good diet. Build awareness of regulations. Create awareness that there is a larger market to be accessed. What are we already doing domestically? Are people aware that there is a constitutional review? People need to be confident before they will embrace change (example of locals being afraid to enter the new supermarket). How do we communicate the message to people? All players have a role in raising awareness. Spread the word to people not at the conference. Who informs and sensitizes the top level - How do we reach these people? Both use and be wary of influence of the press. Make the press aware of the need. Raise awareness of the expectations of the European consumer. Engage consumer organisations to create awareness of ICT (information and communications technology). Engage government on awareness - borrow for what the private sector has already done? What is the cost of awareness and who would fund that? Work in partnerships. Back to basics - Every industry is different - get better organised. "Fisheries sector is doing enough". Engage consumer organisations to create awareness amongst consumers. Engage government on creating awareness. Raise awareness with buyers that quality has a price. Appoint a secretariat to bring stakeholders together.

10. Capacity building

Develop competent, informed, confident and compliant growers. Exporters (to) mentor smallholders. Need different education programmes and curricula for extension; government; private sector; retailers,

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etc. Train a Group Secretary. Prepare for new requirements in capacity planning for operations. Aid inspection and certification roles in industries. Traceability is about the use of ICT - raise computer literacy. Common education framework - Details by sector. Curriculum / training by industry. All steps in the chain. Address broader aspects as well as specific aspects. Traceability is not covered in Extension programmes! (NFSCC to address). Academics + public sector + private sector to work together. Universities should partner with industry to solve problems. Use Nairobi University students for research on food safety. Local projects. Develop a pool of students with experience.