

THE IMPLEMENTATION OF AN IMPROVED FOOD SAFETY SYSTEM BASED ON RISK-ANALYSIS REQUIREMENTS

POLICY PAPER SUMMARY



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Eastern Partnership Civil Society Forum Georgian National Platform is an association of local and international non-commercial legal entities registered in Georgia, aiming to promote and implement the goals set by the Joint Declarations of the Prague, Warsaw and Vilnius Eastern Partnership Summits and the EU-Georgia Association Agreement of European Neighborhood Policy and other joint events.

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Summary

State regulation on food safety must be based on a country's existing risks – this principle, based on the WTO sanitary and phito-sanitary measures, is a mandatory compliance for Georgia after signing the Association Agreement. The principle has been codified in Georgia since 2005. However, in 2014 the government established an institution tasked with evaluating food safety risks– a risk assessment service (as part of the scientific research center for rural production). During 2015, the institution carried out several risk assessments, which show several deficiencies in the system:

- The risk assessment prepared by the agency involves as a rule only the identifying description of the threat, which is followed by recommendations to reduce the risks. However, the documents do not contain information or an evaluation as to what degree people in Georgia are exposed to this risk and what the scale of the risk identified is to the human health. The recommendations given by the researchers for risk reduction are not substantiated in terms of their efficiency (the scale to which it will reduce diseases) or how cost-effective and costly they are.
- The priority of risks selected for evaluation are debatable. It is unclear why certain substantial illnesses related to food safety, such as Salmonellosis, Shigellosis, Escherichia, Brucellosis, Anthrax, Trichonellosis, Amebiasis, etc, are not assessed.

In our opinion, these deficiencies of the risk assessment document are caused by:

- The fact that food related disease data is scarce and incomplete. Most of the diagnoses is usually phrased as: “the likely cause of the infection is Diarrhea” or “probably food poisoning”. A laboratory research of the causes of the disease is rarely conducted. Therefore, this partial data is extremely difficult to use in the risk assessments.
- Risk management agencies (Ministry of Agriculture, Ministry of Labor, Health and Social Protection, Ministry of Finances, Ministry of Environment and Natural Resources, Ministry of Economy and Sustainable Development) are not ready to commission risk assessment policy documents and do not have responsible persons or procedures identified for these purposes. Furthermore, there does not exist a coordination among the managers and the procedures to rank the risks proposed either.
- Confusion among the risk evaluators may be caused by an incomplete differentiation between risk assessment and risk management procedures in the normative acts. Namely, the statute stipulates that the risk evaluator must “establish an acceptable level of risk”, which should be the function of risk management, not risk assessment.

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- The risk assessment process does not adequately guarantee the impartiality of the experts participating in the process, including the discussion on the risk evaluations: the majority of the scientific-consultative council is made up by the representatives of the agricultural sciences, while the doctors and food experts are rarely part of the process, which contributes to the risk that the interests of local production may case shadow over the interests of human health.

To increase the quality, trustworthiness and usability of risk assessments conducted in Georgia, the above-described deficiencies must be eliminated in a timely manner. Otherwise, Georgia will face problems in terms of fulfilling the WTO SPS agreement and in evaluating the food safety system, established as a result of approximation with the EU's analogous system.

To improve the situation, it is recommended to:

- Establish a mutual coordination procedure and criteria for the risks to be evaluated among the management agencies.
- Clearly delineate the functions of the risk evaluator and risk manager, their tasks and procedures for cooperation.
- Design a stricter quality control of risk assessment (including the participation of the State Audit System, the ongoing foreign support projects, and the experts who are part of these projects).
- Implement more substantial measures to ensure responsibility and impartiality of the experts conducting the risk assessments. Increase the share of doctors and food experts in the Scientific Council.
- Establish the list of resources and information, which are required to evaluating the major infections related to food safety in the Country by the risk assessment agency. Establishing measures securing this information, including the implementation of mandatory research requirements of food-related infections.

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