Comparative analysis of the implementation of food safety policies between EU and Japan

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**Background**

- In many countries the food safety system has been reformed and the framework of risk analysis has been introduced.
  - importance of risk-based measures
  - Transparence

Regarding food safety system in Japan

- What has been achieved and what is the current situation?
- What remains as problems or challenges?
Aim of this Presentation

• Clarify the current situation and challenges of food safety system in Japan
  ◆ Focusing on the enforcement; implementation and control stage
  ◆ In comparison with European system
  • EU as a model of reformation of Japanese system
  • Although food safety standards are harmonized at European level, member states of EU have responsibility for its implementation and control.
  • German system

• official documents and websites
  • Interviews (2011-2014)
    • MHLF/ local governments in Japan
    • BVL/The Ministry for Climate Protection, Environment, Agriculture, Conservation and Consumer Protection of the State of North Rhine-Westphalia/FBOs in Germany
Risk analysis: a structured decision-making process

Risk assessment
- scientific evaluation

Risk management
- preliminary risk management activities
- identification and selection of risk management options
- implementation of risk management decision
- monitoring and review

Risk communication
The interactive exchange of information and opinions throughout the risk analysis process

Implementation stage

• FAO/WHO (2006)
  • When preferred risk management options have been selected, they must be implemented by the relevant stakeholders. In many countries today, industry has the primary responsibility for implementing regulatory standards.
  • Generally, national food safety authorities must validate and verify implementation of regulatory standards.

Official control

any form of control that the competent authority or the Community performs for the verification of compliance
...Reg 882/2004

On-site inspection, sampling analysis, monitoring, surveillance etc.
Previous researches

- Comparative analysis of food safety governance
  - Vos and Wendler (2006) among EU countries
  - Skogstad (2006) EU/USA/Canada
  
  Viewpoint of comparison ⇒ science/citizen, governance

- Performance measurement and ranking of food safety system in various countries
  - Charlebois and Hielm (2012)

  Which criteria should be used for a ranking system
Competent authorities responsible for food safety

Central:
- Ministry of Agriculture, Forestry and Fisheries
  - Regional Agricultural Administration Office
- Ministry of Health, Labor and Welfare
  - Regional Health Administration Office
  - Quarantine

Local:
- Agriculture department
  - Livestock hygiene service center
- Health department
  - Public health center
  - Meat inspection center

Primary production → Manufacturing /processing → Distribution
Restaurants
Food safety control system in Japan

Agricultural department of local governments
- Advice by agricultural extension worker
- Advice by livestock hygiene service center

Primary production

Manufacturing /processing

Public health center of local governments

Distribution

Restaurants

Food Safety Basic Act
- FBOs bear the primary responsibility for ensuring Food safety

Regulations on agricultural inputs

requirements for hygiene management for domestic animal

Hygiene:
Guideline for fresh products

Regulation is required for 34 food business types

Food Sanitation Act
- Standards
- General hygiene requirements
- HACCP ...not mandatory

Approval is required for 34 food business types

Imported food

Traceability for bovine/beef, rice/rice products

Regional Agricultural Administration Office

quarantine
Food safety control by public health centers

- Local governments decide the frequencies of on-site inspection and the number of samples.
- Mostly frequencies of inspection are decided according to the type of establishment.
Problems of Japanese food safety control system

• fragmented
• inspection at primary production
• The difference among local governments
Requirements for food business operators: EU

- Primary production
- Manufacturing /processing
- Distribution
- Restaurants

Reg 178/2002
- Responsibility
- Traceability
- Emergency etc.

General hygiene requirements both for FBOs of food of animal-origin and non-animal origin + specific requirements

- Approval is required
- Registration

Food of non animal origin
- Food of animal origin + sprouts

Standards
- General hygiene requirements + specific requirements
- Procedures based on the HACCP principles

Regulation on agricultural inputs

Germany

Local food control and veterinary authority
System of official control in Germany

- Germany is a federal state with 16 States (Länder) and the Länder are responsible for ensuring implementation of the laws and official controls.

- The Federal Ministry of Food and Agriculture.
- 16 Ministries of Federal States
- Provincial authorities (if existing)
- District and municipal authorities
- Food business operators

Support by LAV’s work

Reg. 882/2004

General obligations with regard to organisation of official controls
- without prior warning
- at any of the stages of production, processing and distribution
- on a risk basis and with appropriate frequency

the Framework Control Regulation (AVV RÜb)

Commonly agreed principles among Länder

European Commission, Country profile- the organisation food safety, animal health, animal welfare and plant health control systems Germany, 2013
Risk based inspection frequencies according to the Framework Control Regulation

Primary production: Every three year

Manufacturing/processing/distribution/restaurants:

Rating criteria:

<table>
<thead>
<tr>
<th>rating criteria</th>
<th>marks</th>
</tr>
</thead>
<tbody>
<tr>
<td>the type of establishment</td>
<td>0-100</td>
</tr>
<tr>
<td>risk category of the product</td>
<td>0-20</td>
</tr>
<tr>
<td>the past record</td>
<td></td>
</tr>
<tr>
<td>the compliance with food legislation</td>
<td>0-5</td>
</tr>
<tr>
<td>traceability</td>
<td>0-3</td>
</tr>
<tr>
<td>the training of staff</td>
<td>0-7</td>
</tr>
</tbody>
</table>

Reliability of own check:

<table>
<thead>
<tr>
<th>rating criteria</th>
<th>marks</th>
</tr>
</thead>
<tbody>
<tr>
<td>HACCP-procedures</td>
<td>0-12</td>
</tr>
<tr>
<td>analyses of products</td>
<td>0-5</td>
</tr>
<tr>
<td>compliance with temperature/cooling regulations</td>
<td>0-8</td>
</tr>
</tbody>
</table>

Hygiene management:

<table>
<thead>
<tr>
<th>rating criteria</th>
<th>marks</th>
</tr>
</thead>
<tbody>
<tr>
<td>condition of the building</td>
<td>0-5</td>
</tr>
<tr>
<td>cleaning and disinfection</td>
<td>0-8</td>
</tr>
<tr>
<td>hygiene of staff</td>
<td>0-11</td>
</tr>
<tr>
<td>hygiene of production</td>
<td>0-13</td>
</tr>
<tr>
<td>pest control</td>
<td>0-3</td>
</tr>
</tbody>
</table>

Class control frequencies:

<table>
<thead>
<tr>
<th>class</th>
<th>control frequencies</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>daily</td>
</tr>
<tr>
<td>2</td>
<td>weekly</td>
</tr>
<tr>
<td>3</td>
<td>monthly</td>
</tr>
<tr>
<td>4</td>
<td>quarterly</td>
</tr>
<tr>
<td>5</td>
<td>twice a year</td>
</tr>
<tr>
<td>6</td>
<td>yearly</td>
</tr>
<tr>
<td>7</td>
<td>every 1.5 year</td>
</tr>
<tr>
<td>8</td>
<td>every two year</td>
</tr>
<tr>
<td>9</td>
<td>every three year</td>
</tr>
</tbody>
</table>

Static (can not be influenced by FBO):

variable (can be influenced by FBO):

Based on the hearing material at BVL and Allgemeine Verwaltungsvorschrift über Grundsätze zur Durchführung der amtlichen Überwachung der Einhaltung lebensmittelrechtlicher, weinrechtlicher und tabakrechtlicher Vorschriften
Conclusions

• implication for Japan
  • risk based control system
  • the way work together by local governments to decide commonly agreed principles

• what is necessary is common but how to be achieved could be different → experience of other countries might be useful
Thank you for your attention

References


• Vos,E. and Wendler,F., ”Food Safety Regulation in Europe”, Intersentia, 2006

• FAO/WHO, Food safety risk analysis – A guide for national food safety authorities-, 2006