STDF 246 : Preparation of a Sanitary and Phytosanitary Action Plan for Cambodia

Progress note 1 (October 2009) – to task force members for distribution as appropriate

I. Background

1. Following start up in May 2009, the project has become operational through the following:

   - 3 visits from the team leader (May, July and September) to Cambodia to convene background meetings, prepare terms of reference, identify national and international consultants, and hold briefing sessions and task force meetings;
   - recruitment of a national project coordinator;
   - hiring of 3 international technical specialists for the studies on laboratories (K. Ziller), phytosanitary issues (R. Khetarpal) and the fisheries sector (A. Villadsen) to be conducted over the period October-December 2009;
   - commissioning of a study on procurement preferences of high value fresh produce (hotel, restaurant and supermarket sector) to determine whether product safety and certification is a factor in procurement decisions;

2. The fourth national task force meeting was held on 2 October 2009 at FAO Offices in Phnom Penh. Draft minutes are attached at Annex 1.

3. This note sets out the main substantive areas of progress so far.

II Laboratory Study – initial findings

4. Benefiting from the draft report by the previous ADB mission on laboratory capacities in the Greater Mekong Sub-region, carried out in June-July 2009 (ADB, TA 6450), the initial meetings of the laboratories consultant (Dr Ziller) with key laboratory personnel lead to a number of initial observations (see below).

5. Five laboratories were visited with some role in the testing of food and agricultural products, namely:

   - CamControl (Ministry of Commerce)
   - National Agricultural Laboratory (pesticide testing; soil & fertilizer), National Veterinary Research Institute (both Ministry of Agriculture, Forestry and Fisheries)
   - National Laboratory for Drug Quality Control (Ministry of Health)
   - Industrial Laboratory Centre of Cambodia (Ministry of Industry, Mines and Energy).

   One additional laboratory is presently under construction for the MAFF-DAHP, Department of Animal Health and Production. The laboratory, which is expected to be completed in early 2010 and operational in early 2011, is reportedly planned to test animal feed, including drug residues in meat and animal products. ADB is said to likely fund equipment and training.

   Investigations are on the way to obtain more details.

6. Additional visits were undertaken to other institutions to understand the context of laboratory work elsewhere in Cambodia (Institut Pasteur, University, Ministry of the Environment, Department of Metrology, etc)

Facilities

7. The facilities available to the laboratories are not uniformly good, or always appropriate for running laboratory activities. To illustrate with some examples:

    - one active laboratory operates in cramped conditions following a move of building (space is a constraint to the extent that certain equipment has not been re-commissioned since the move, and an area of testing has been allowed to lapse).
    - a second laboratory operates in older buildings which are not purpose-built and where the layout precludes efficient operation of a laboratory service.
    - a third laboratory is purpose-built but some aspects of laboratory design are not really appropriate and will need modification

8. Each of the five public sector laboratories seen could make some improvements to layout or use of infrastructure/facilities.

Equipment and supplies

9. Equipment – of varying levels of sophistication – has been provided by development partners over a number of years. Some is in use; some is no longer in use; some has not yet been used. This range is seen most notably in both Camcontrol and NAL, but applies to a lesser extent elsewhere.

10. All laboratory managers interviewed commented on the difficulty of obtaining supplies (reagents, gases, glassware, etc) as one of the constraints they are currently facing.

Types of testing

11. Several of the laboratories are equipped in similar fashion to undertake a similar range of tests. This is justified by the different mandates claimed by the different laboratories. For instance.

    - CamControl and ILCC both undertake estimation of heavy metal (mercury, cadmium, etc) contamination using a technique known as Atomic Absorption Spectrometry (A.A.S.)
    - CamControl, ILCC and Ministry of Health (as well as the Institut Pasteur) have facilities for microbiological analysis of food and water samples

12. We are urgently requesting a clear statement of the current attribution of mandates, including identification of areas where regulations appear to allow for different interpretations.

Volumes of activity

13. In visiting the laboratories, it is clear that much of the laboratory activity is driven on a project or issue basis (eg 3-MCPD in soy sauce). When a particular problem results in a sampling programme for a particular product being set up, samples are collected, supplies procured, and tests carried out. In the absence of such stimuli, activity levels are not high, depending on occasional private sector requests, requests for testing from NGOs, etc.

14. No evidence was seen of sampling being designed on risk-based considerations.

15. As a general rule, without specifying a benchmark level of activity (which varies depending on the nature of tests undertaken), if laboratories do not operate to a regular programme of work, the quality (accuracy) of testing results will suffer. It seems likely that most of the public sector laboratories visited would be prone to this.

16. Allied to this, current staffing levels are adequate only for the current relatively low levels of activity. If a regular monitoring programme for food safety in Cambodia (imports, exports and domestic production) is to be put in place, more and better trained staff with appropriate basic qualifications will be needed.

General Comments

17. None of the five public laboratories seen are presently in a position to seek a general accreditation under ISO 17025.

18. Laboratory work benefits from scale; this would tend to preclude the equipping of several facilities to undertake the same or similar tests. However scale can be achieved in a number of ways. For instance:

    - Laboratories can operate a so-called "federated system", each specializing in a particular type of test
    - Laboratories can share tasks involved in testing, with sample collection and preparation handled by sector laboratories (along with results analysis and certification), and with one facility operating the most sophisticated equipment as a service to the others
    - Some counties have centralized to have just one laboratory responsible for all food and agricultural product testing
    - Other countries have managed to implement laboratory facilities to meet export requirements responding to expressed private sector needs

19. Each of these options have advantages and disadvantages. The factors to consider in deciding the best set up for a given country could include:

    - existing capacity, facilities
    - the likelihood of a single sample requiring more than one type of test
    - the required capacity for particular types of testing
    - the extent of demand from the private sector to sustain a full laboratory operation
    - the extent to which the state is prepared to underwrite domestic food safety testing
    - the full ongoing costs (from taking samples to issuing results) to the various agencies of maintaining the eventual laboratory capacity

20. A discussion of the various options and factors to consider will be needed with each of the ministries currently engaged in testing of food and agricultural products.

21. In taking a food chain approach to food safety, it is essential also to include the testing of agricultural inputs such as pesticide quality control, fertilizer and veterinary drugs – this considerable role could be a major task for the National Agricultural Laboratory, or other facilities within MAFF.

22. Certain tests should not be carried out in the same facility for reasons of potential cross contamination. For instance, product quality testing and residue testing should not be done in the same laboratory – maximum permitted residues are now so low, and equipment so sensitive, that cross-contamination is inevitable. Special care must be taken that pre-medicated feed is not mixed or confused with regular animal feed.

    This is in line with recognized international standards and guidelines (such as ISO 17025, FAO, WHO and others)

III Other items

23. A request by MAFF has been submitted to STDF to extend the scope of the project to include import risk analysis, as a key component in SPS, even if not directly related to export facilitation. This will include both activities relating to plant and live animal imports, and will ensure the plan is more complete.

24. Assuming STDFs agrees, the action plans and high level strategies produced under the FAO TCP strengthening sanitary and phytosanitary systems for Cambodia would be the starting point for this additional work.

IV Next steps

25. The next steps are the following:

    - complete the laboratories study, with further detail from each laboratory (via questionnaire), and a study of laboratory costs in Cambodia to understand the full cost of running facilities for the different types of testing needed – to be concluded with a workshop with all parties to develop an agreed plan for strengthening capacity. This will be based on estimates of testing volumes required, likely costs, existing skills and facilities, etc (December 2009 or latest early January 2010)

    - commission the additional studies required (phytosanitary and fisheries)

    - prepare draft review of mandates (from the legal basis by which the mandate is assumed) for circulation, to identify clear allocation of responsibilities, potential areas of overlap (and potential gaps). This will be based on legal work already undertaken for the FAO TCP, and a short national consultancy to confirm the latest position, and the draft will then be circulated to the task force for confirmation.

    - propose a process of consultation with RGC, in discussion with the FAO Representative, to develop and approve the overall national SPS policy or strategy, which in turn sets the context for the Action Plan (as required by the project document). This will need to draw on the current review of the National Codex Committee (undertaken by an FAO consultant, L. Copeland).

26. The next task force meeting is expected to be held in November or latest early December. If early, this could coincide with the initiation of the Fisheries and Phytosanitary studies.

National Task Force 4th meeting: STDF project 246 – 2 October 2009, FAO Office, Phnom Penh:

In attendance:

P. Oun, Camcontrol, MoC
D. Theng, Camcontrol, MoC
C. Sopha, ISC, MIME
C. Borin, ISC, MIME
H. Vanhan, GDA, MAFF
D. Norin, GDA, MAFF
S. Viryak, FiA, MAFF
N. Niyazi, FAO
K. Ziller, FAO
M. Robson, FAO

Apologies
H. Moeun, Camcontrol, MoC

1. Status report against workplan

a) Sector studies to be commissioned by September and complete by December:

- Laboratories (ongoing, Klaus Ziller)
- Phytosanitary (to start Nov. Ravi Khetarpal)
- Fisheries (to start Oct/Nov. Andreas Villadsen)

b) National Consultancies underway or about to be commissioned:

- Import substitution/higher value for Cambodian producers in Fruit and Vegetables
- Laboratory costs for key testing scenarios
- Preliminary mapping of mandates for key roles in SPS (setting standards, testing of inputs, inspection of products, certification, etc) for validation by others

Note: initial national consultancies have been allocated to CamControl; subsequent consultancies depending on subject will be allocated to MAFF or others as appropriate

c) Laboratories questionnaire

Following this week's interviews a questionnaire will be filled in by laboratory managers (supported by task force members) on the current capacity of the main laboratories, mandate/area to be covered, numbers of samples tested, techniques used, etc – to be distributed by Nuri and filled in within 2 weeks

2. Planned activities (under consideration)

a) Programme of high level briefings regarding issues

b) Mandates workshop at technical level

3. Interaction with other programmes

a) ADB GMS

Exchange of working papers, and terms of reference, preliminary results has already taken place. Regular briefings with L. Ding at ADB, Bangkok

b) ADB Cambodia

Project start up due mid October. Original project document included some overlap with STDF 246 (eg review of legislation). In October-November, active discussion will take place with ADB supervisor (K. Bird) and FAO regarding best ways of working together.

4. Discussion

Question was raised regarding national consultancies. Allocation of national consultancies depends on the subjects concerned. Both terms of reference and outputs should be seen by the whole task force.

Question was raised regarding the scope of the study – should import risk analysis not be given more emphasis than at present, as a complement to export facilitation. For instance, while livestock is not a sector which is identified as having export potential, live animal imports have the potential to transmit animal disease of animal and zoonotic consequence, and should be appropriately managed.

It was pointed out that the project document agreed with STDF placed the emphasis on export facilitation.

It was agreed to seek guidance from STDF regarding a slight increase to the scope of the project, specifically to incorporate the outputs from the FAO TCP on building sanitary and phytosanitary in Cambodia (TCP/CMB/3104) and undertake any additional work needed. This may have consequences for timetables and resource needs. In the event of additional resources being required to broaden work in this way, then they will be sought from development partners.