



GOVERNMENT OF TRINIDAD AND TOBAGO

National Food Safety Policy 2018 - 2023



October 2018

GOVERNMENT OF TRINIDAD AND TOBAGO

NATIONAL FOOD SAFETY POLICY

2018 - 2023

Port of Spain, Trinidad and Tobago

October 2018

TABLE OF CONTENTS

| | |
|---|-----|
| LIST OF ACRONYMS | iii |
| EXECUTIVE SUMMARY | iv |
| 1. INTRODUCTION | 1 |
| 2. PRESENT SITUATION ON FOOD SAFETY IN TRINIDAD AND TOBAGO | 6 |
| 2.1 Institutional Framework | 6 |
| 2.2 Legislative Framework | 10 |
| 2.3 International and regional policy context..... | 11 |
| 2.4 National Policy context..... | 14 |
| 2.5 Situation Analysis..... | 15 |
| 2.5.1 Management of Food Control | 15 |
| 2.5.2 Food Laws and Regulations | 16 |
| 2.5.3 National Food Standards, Guidelines and Codes of Practice | 17 |
| 2.5.4 Foodborne Disease Surveillance, Food Monitoring and Epidemiological Data | 18 |
| 2.5.5 Communication and Public education | 19 |
| 2.6 Rationale for Food Safety Policy | 20 |
| 3. THE POLICY | 21 |
| 3.1 Scope..... | 21 |
| 3.2 Vision | 21 |
| 3.3 Policy Goals | 21 |
| 3.4 Policy Objectives..... | 22 |
| 3.5 Guiding Principles | 22 |
| 3.6 Policy Recommendations | 23 |

| | | |
|-------|---|----|
| 3.6.1 | Food Safety Legislation | 23 |
| 3.6.2 | Coordination of the Food Safety Function | 24 |
| 3.6.3 | National Food Standards, Guidelines and Codes of Practice | 26 |
| 3.6.4 | Surveillance and Emergency Response..... | 27 |
| 3.6.5 | Information, Education and Communication | 28 |
| 4. | IMPLEMENTATION..... | 30 |
| 4.1 | Roles and Responsibilities | 30 |
| 5.2 | Policy Implementation Plan | 31 |
| 6. | MONITORING AND EVALUATION | 32 |
| 7. | CONCLUSION | 33 |
| 8. | ANNEXES..... | 34 |

LIST OF ACRONYMS

| | |
|---------|---|
| CAC | Codex Alimentarius Commission |
| CAHFSA | Caribbean Agricultural Health and Food Safety Agency |
| CARICOM | Caribbean Community |
| CARPHA | Caribbean Public Health Agency |
| CFDD | Chemistry Food and Drugs Division |
| COTED | CARICOM Council for Trade and Economic Development |
| CROSQ | CARICOM Regional Organisation for Standards and Quality |
| FAO | Food and Agriculture Organization of the United Nations |
| FSSC | Food Safety System Certification |
| GAP | Good Agricultural Practices |
| GORTT | Government of the Republic of Trinidad and Tobago |
| HACCP | Hazard Analysis Critical Control Point |
| MALF | Ministry of Agriculture, Land and Fisheries |
| MoH | Ministry of Health |
| MoRDLG | Ministry of Rural Development and Local Government |
| MTI | Ministry of Trade and Industry |
| NCC | National Codex Committee |
| NFSCC | National Food Safety Coordinating Committee |
| PHI | Public Health Inspector |
| SPS | Sanitary and Phytosanitary Measures |
| WHO | World Health Organization |

EXECUTIVE SUMMARY

An effective national food control system is a necessity for every nation to protect its consumers (national and international) against foods that are contaminated, adulterated or in other ways injurious to health, or which are incorrectly packaged or labelled. National food control systems can contribute to economic development by ensuring and maintaining consumer confidence in the food system and provide a sound regulatory foundation for domestic and international trade of food.

The National Food Safety Policy expresses the Government of Trinidad and Tobago's commitment to food safety. The goal of the policy is to protect public health by providing assurance of safe food from farm to fork, through a coordinated and collaborative approach among all responsible ministries, agencies and stakeholders. In Trinidad and Tobago, food regulation and control activities are carried out by various Ministries and agencies. Ensuring coordination and oversight for the national system is therefore an important concern, as is the need for legislation, which is sufficiently flexible to respond to changes in the environment. The policy outlines the mode of implementation to achieve an effective food safety system. The policy covers the period 2018 -2023, after which it should be comprehensively reviewed.

The National Food Safety Policy has five main objectives:

1. To guide modern comprehensive legislation to promote food safety in Trinidad and Tobago;
2. To establish a mechanism for coordinating food safety related activities;
3. To strengthen surveillance systems including early warning system and emergency response;

4. To harmonize and promote the adoption of international, regional and national standards, guidelines and codes of practice;
5. To strengthen the mechanism for the provision of food safety information, education and communication.

The principal policy recommendations are as follows:

1. There should be a review and rationalization of existing food safety laws and enactment of modern legislation;
2. An inter-agency National Food Safety Coordinating Committee should be created to advise on the coordination of food safety matters. This Committee should report to the Minister of Health, who is currently responsible for food standards, labelling and other matters connected with the manufacture and distribution of food in Trinidad and Tobago;
3. The Coordinating Committee should be assisted by a Secretariat to provide technical and administrative support. To deepen collaboration between the Ministry of Health and the Ministry of Agriculture, Land and Fisheries—two main food safety regulatory agencies—it is recommended that the Secretariat be placed under the Ministry of Agriculture, Land and Fisheries;
4. National food standards, guidelines and codes of practice for Trinidad and Tobago, based on adoption/adaptation of the Codex Alimentarius should be developed by the Chemistry Food and Drug Division of the Ministry of Health. These standards and guidelines shall cover cottage industries;
5. An integrated food chain surveillance system, which links public health surveillance data with data from the farm to the consumer, should be established;

6. A functional Food Safety Emergency Preparedness and Response plan and system should be put in place;
7. Implementation of food safety legislation, coordination of operations and allocation of resources between Ministries and agencies should be guided using Memoranda of Understandings;
8. An electronic one-stop shop system for food that allows manufacturers to submit standardized information and documents for all food safety regulatory requirements, at a single-entry point should be established.

The policy hinges upon the principles of shared responsibility; coordination and collaboration; risk analysis; risk assessment and risk management; transparency; and continuous improvement, to support achievement of its vision, goals and objectives.

A comprehensive strategic plan, which includes budgetary requirements and a monitoring and evaluation framework, should be developed to fully operationalize the National Food Safety Policy. An Interim Steering Committee should be established to provide oversight for this activity, pending establishment of the National Coordinating Committee.

It is pertinent to indicate that this Policy deals solely with Food Safety and not Food Quality or Nutritional Content. Also, this Policy reflects the current food control system in Trinidad and Tobago.

1. INTRODUCTION

Food safety is the assurance that food will not cause harm to the consumer when it is prepared and/or eaten according to its intended use¹. It refers to all hazards, that may make food injurious to the health of the consumer and is a major cross-cutting issue linked to food security, public health, tourism, trade and investment. Food security, at the individual, household, national, regional and global levels is achieved when all people, at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life². Food safety is therefore one of the pillars of food security.

Foodborne illnesses are most frequently caused by foods that are contaminated with microorganisms such as *Escherichia coli*, *Norovirus*, *Campylobacter* and *Salmonella*. Infection with these microorganisms can cause symptoms that are mild to life threatening, the more common being diarrhoea, vomiting, abdominal pain and nausea. In addition to microbiological contamination, health can be adversely affected by chemical hazards in foods such as naturally occurring toxins, pesticides, persistent organic pollutants and heavy metals. Natural toxins may pose a serious health threat to humans and livestock. In humans, long term exposure to mycotoxins, marine biotoxins and cyanogenic glycosides can affect the nervous and immune systems, retard normal development or cause cancer. Persistent organic pollutants such as dioxins and polychlorinated biphenyls are the unwanted by-products of industrial processes and waste incineration. These compounds accumulate in the environment and human body. Dioxins are highly toxic and can cause reproductive and developmental problems, damage the immune system,

¹ Recommended International Code of Practice General Principles of Food Hygiene CAC/RCP 1-1969, Rev. 4. 2003. Codex Alimentarius Commission.

² Food and Agriculture Organization: World Food Summit, 1996.

interfere with hormones, and like naturally occurring toxins, are carcinogenic. Heavy metals such as lead, cadmium and mercury cause neurological and kidney damage. Heavy metal contamination in food occurs mainly through polluted air, water and soil.

Food borne diseases are of global concern and constitute an issue requiring priority attention in Trinidad and Tobago. Statistics estimate that each year approximately 135,000 Trinidad and Tobago residents (about 1 in every 104 persons) experience illness due to consumption of a contaminated food or drink. The economic cost of acute gastroenteritis was estimated between USD \$27,331 to \$19,736,344³.

Foodborne illness outbreaks can have a serious damaging impact on the country's brand and image. In Trinidad and Tobago, the tourism industry is a valuable contributor to foreign exchange and employment. This industry is vulnerable to health, safety, security and environmental challenges. Within the last decade, Trinidad and Tobago's tourism industry experienced the impact of several foodborne outbreaks. In 2000, for example, a *Salmonella* outbreak at a major hotel resulted in a \$4 million-dollar class action lawsuit. In 2002, a food poisoning outbreak resulted in the closure of a hotel for three months, leaving 190 staff on the breadline; and in 2007, a *Norovirus* outbreak at an all-inclusive hotel also resulted in its temporary closure.

Globalization has resulted in the growing movement of people, live animals and food products across borders. Trinidad and Tobago, like many other Caribbean countries, is heavily dependent upon imported food. In 2016, the country's food import bill was TT\$

³ Burden and Impact of Acute Gastroenteritis and Foodborne Pathogens in Trinidad and Tobago. 2013. Lakhani, C., Badrie, N., Ramsubhag, A., Sundaraneedi, K., & Indar, L. Journal of Health, Population, and Nutrition, 31(4 Suppl 1), S30–S42.

5.6 billion dollars.⁴ In this context, offering consumers protection against food safety issues such as food fraud⁵ or the possible harmful effects of genetic manipulation becomes increasingly important. Antimicrobial resistance and zoonotic diseases transmitted through meat and dairy products are growing public health threats globally. Since the country's import of live animals is also relatively high (TT\$ 15 million in 2016), animal health is also an important concern as contaminated livestock feed can introduce hazards into the food chain, as can residues of veterinary drugs.

The various climate-change-related phenomena - changes in temperature and precipitation patterns, increased frequency and intensity of extreme weather events, ocean warming and acidification – are thought to present a number of direct and indirect challenges to food safety. While there is growing evidence of some expected effects on food safety, others remain largely speculative.

It is the role of food safety authorities to actively seek information on emerging hazards and risks and to re-orient national programmes as required to adequately deal with an evolving situation. This will require increased emphasis on integrated surveillance and sharing of data internationally.

As part of its economic diversification strategy, the Government of the Republic of Trinidad and Tobago (GORTT) is pursuing development of innovative food products and expansion in food exports. Access to export markets will however depend upon the country's ability to meet the regulatory requirements of importing countries. Investments in strengthening the national food safety system must therefore be made to improve the

⁴ Central Statistical Office, Trade Division. 2017

⁵ Food fraud is committed when food is illegally placed on the market with the intention of deceiving the customer, usually for financial gain. It involves criminal activity that can include food mislabeling; substitution; counterfeiting; misbranding; dilution; adulteration; using unapproved enhancements or additives; misrepresenting characteristics (e.g., country of origin); or intentional contamination with a variety of chemicals, biological agents or other substances harmful to health. (Overview of Food Fraud in the Fisheries Sector, 2016. FAO)

country's trade competitiveness. The country's food safety capacity will impact the brand and image associated with manufactured exports of Trinidad and Tobago. Fully functional and credible national food control systems will boost confidence within export markets.

An effective food control system is necessary to protect national and international consumers. Food control systems usually cover the entire food chain continuum, that is, from farm to fork. Responsibility for food safety should be shared by all stakeholders along the value chain, including Government, food manufacturing and processing industry and consumers. Each component of the chain is responsible for managing food safety risks under its control. National food control systems typically consist of the five core, but interdependent elements⁶:

- Food Law and Regulation;
- Food Control Management;
- Inspection Services;
- Laboratory Services: Food Monitoring and Epidemiological Data;
- Information, Education, Communication and Training

Box 1

Food control is defined as: a mandatory regulatory activity by national or local authorities to provide consumer protection and ensure that all foods during production, handling, storage, processing, and distribution are safe, wholesome and fit for human consumption; conform to safety and quality requirements; and are honestly and accurately labelled as prescribed by law.

Assuring Food Safety and Quality-
Guidelines for Strengthening National
Food Control Systems. 2003.

A well-defined National Food Safety Policy will enunciate the Government's commitment to ensuring the safety of the national food supply as well as food produced for regional

⁶ Assuring Food Safety and Quality- Guidelines for Strengthening National Food Control Systems. 2003. FAO/WHO

and international trade. It will also provide the required framework and guidance for all sectors to improve collaboration and communication and to operate in an integrated manner. In sum, the policy will create the enabling environment in which food safety measures can be developed and effectively enforced to ensure public health and trade in food⁷.

⁷ Guidelines for developing and implementing a National Food Safety Policy and Strategic Plan. 2012.

2. PRESENT SITUATION ON FOOD SAFETY IN TRINIDAD AND TOBAGO

2.1 Institutional Framework

Trinidad and Tobago's food control system uses a multiple-agency approach with the following six Ministries and the Tobago House of Assembly sharing main responsibility for food safety and control.

- Ministry of Health – The national authority with responsibility for protecting the population's health and providing oversight of the health system. Under the Food and Drug Act, the Food Advisory Committee provides advice on food standards, labelling and other matters connected with the manufacture and distribution of food.
- Ministry of Agriculture, Land and Fisheries – This Ministry exercises control over animal and plant health and food production, pre-harvest and post-harvest.
- Ministry of Rural Development and Local Government – The arm of the Central Government that maintains direct and constant connection to citizens through the Municipal Corporations.
- Ministry of Finance – Supports economic growth and development by facilitating legitimate trade and travel, revenue generation and collection, and ensuring border security.
- Ministry of Public Utilities – Facilitates the effective delivery of efficient, affordable and quality public utilities to the population, including potable water.
- Ministry of Trade and Industry – This Ministry is responsible for growing trade, business and investment, particularly through the non-energy sectors of the economy.

- Tobago House of Assembly – Autonomous legislative body responsible for the island of Tobago.

The relevant departments and divisions within each of these agencies and the responsibilities they bear for food safety and food control related activities are outlined in Table 1.

Table 1: Food Safety Programs and Services provided by agencies in Trinidad and Tobago-

| • Ministry of Health | |
|---|--|
| Chemistry Food and Drugs Division | Regulates the importation, manufacture, sale, labelling and disposal of food, drugs, cosmetics and devices. CFDD is the National Codex Contact Point and currently functions as the INFOSAN Emergency Contact Point. <ul style="list-style-type: none"> • Pesticide and Toxic Chemicals Inspectorate- Responsible for the enforcement of the Pesticide and Toxic Chemicals Act and Regulation. • Food and Drug Inspectorate- Responsible for the enforcement of Food and Drugs Act and Regulations. • Chemistry, Food and Drugs Lab- Responsible for the chemical and microbiological analysis for compliance with the Food and Drugs Act and Regulations and the Pesticide and Toxic Chemicals Act and Regulation. |
| Public Health Inspectorate | Responsible for food inspection, monitoring and sampling. Trains and registers food handlers. Registration of premises and maintenance of registers. Epidemiological investigation and response to complaints. |
| Veterinary Public Health Inspectorate | Conducts epidemiological investigation, surveillance and control of zoonotic diseases. Conducts risk assessments and inspection for the importation and domestic production of foods of animal origin including bees, seafood etc. |
| Trinidad and Tobago Public Health Lab | Microbiological analysis of food and water samples and human clinical samples. |
| Epidemiology Unit (formerly National Surveillance Unit) | Participates in foodborne disease surveillance for communicable diseases |
| Food Advisory Committee | Responsible in assisting and advising the Minister with the responsibility for health, with respect to food standards, labelling and other matters connected with the manufacture and distribution of food. |
| • Ministry of Agriculture, Land and Fisheries | |
| Research Division | Performs general pest and disease monitoring and surveillance. Enquiry Point for the World Trade Organization Sanitary and Phytosanitary Measures. |
| Plant Quarantine Unit | Responsible for issuance of import permits for plant and plant products and issuance of phytosanitary certificates. This unit is the WTO/SPS Enquiry Point for Trinidad and Tobago. |
| Animal Production and Health Division | Issues import permits for animal and animal products, performs risk analysis for the importation of animals and animal products. Conducts import inspection of live animals, operates animal quarantine facilities, animal disease surveillance and emergency response for the introduction of exotic animal disease. |
| Veterinary Diagnostic Laboratory | Diagnoses livestock and major zoonotic diseases in animals from the public and the private sectors. Services offered include cytology, haematology, immunology, parasitology, microbiology, urinalysis, pathology, serology and virology |

| | |
|---|---|
| National Agricultural Marketing and Development Corporation | Creates, facilitates and maintains an environment conducive to the efficient marketing of agricultural produce and food products through the provision of marketing services and the stimulation of business investment in the agro-industrial sector. This agency is also responsible for the administration of the Good Agricultural Practices (GAP) Programme. |
| • Ministry of Rural Development and Local Government | |
| Public Health Inspectorate | Responsible for food inspection, monitoring and sampling. Trains and registers food handlers. Registration of premises and maintenance of registers. Epidemiological investigation and response to complaints. |
| • Ministry of Public Utilities | |
| Water and Sewerage Authority | Provision of potable water supply to all citizens. Conducts water safety analysis. |
| • Ministry of Finance | |
| Customs and Excise | Manages the Automated System for Customs Data. This system provides relevant documents for every shipment of food imported into Trinidad and Tobago. |
| • Ministry of Trade and Industry | |
| Consumer Affairs Division | Responsible for the investigating consumer complaints. The Division does not handle food safety and quality complaints as these are addressed by the MoH and MoRDLG. |
| Trinidad and Tobago Bureau of Standards | Responsible for coordinating the national input into the regional standards development process at the CARICOM Regional Organisation for Standards and Quality (CROSQ). |
| • Tobago House of Assembly | |
| Division of Health, Wellness and Family Development | Food safety program implemented by the Public Health Services Department. |
| Division of Food Production, Forestry and Fisheries | Assists stakeholders in the production, processing and marketing of agricultural and fishery products, and provides services related to post-harvest management and safety of primary and minimally processed products. |

2.2 Legislative Framework

The institutions involved in food safety, are governed by several pieces of legislation. These Acts and their supporting Regulations stipulate the procedures by which the various agencies must operate, the limits of their enforcement powers, the responsibilities of organizations and consumers and sanctions and penalties. There are currently 15 different Acts pertaining to food safety, animal and plant health (Table 2).

Table 2: Legislative Framework Governing Food Safety and food control in Trinidad and Tobago

| Ministry | Legislation |
|--|--|
| Ministry of Health | Food and Drugs Act Public Health Ordinance Pesticides and Toxic Chemicals Act Antibiotics Act Quarantine Act and Regulations |
| Ministry of Agriculture, Land and Fisheries | Animal Diseases and Importation Act Plant Protection Act |
| Ministry of Rural Development and Local Government | Municipal Corporations Act Public Health Ordinance Liquor Licenses Act |
| Ministry of Trade and Industry | Consumer Protection and Safety Act Fertilisers and Feeding Stuffs Act Standards Act Metrology Act |
| Ministry of Finance | Customs Act Brewery Act Liquor Licenses Act |
| Ministry of Public Utilities | Water and Sewerage Act |
| Tobago House of Assembly | Tobago House of Assembly Act |

2.3 International and regional policy context

Trinidad and Tobago is a member of the World Trade Organization and is signatory to several international agreements that set out principles, rules and standards to protect human, animal or plant health. These instruments impose legal or other obligations on the GORTT. The following are the main International Conventions and Instruments which Trinidad and Tobago has ratified and have implications for the country's food safety management system:

- World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (SPS): Aims to provide the balance between the right of governments to protect food safety, plant and animal health, and prevent these sanitary and phytosanitary measures from being unjustified trade barriers. SPS measures must be scientifically based on risk.
- Cartagena Protocol on Biosafety to the Convention on Biological Diversity: An international agreement which aims to ensure the safe handling, transport and use of living modified organisms resulting from modern biotechnology that may have adverse effects on biological diversity, taking also into account risks to human health.
- International Health Regulations: An international legal instrument that is binding on 196 countries across the globe, including all the Member States of World Health Organization (WHO). It aims to help the international community prevent and respond to acute public health risks that have the potential to cross borders and threaten people worldwide.
- International Plant Protection Convention: Aims to secure coordinated, effective action to prevent and to control the introduction and spread of pests of plants and plant products.

- Rotterdam Convention: Promote shared responsibility and cooperative efforts among Parties in the international trade of certain hazardous chemicals in order to protect human health and the environment from potential harm.
- Stockholm Convention on Persistent Organic Pollutants: A global treaty to protect human health and the environment from chemicals that remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissue of humans and wildlife, and have harmful impacts on human health or on the environment.
- Technical Barriers to Trade Agreement (TBT): Aims to ensure that technical regulations, standards, and conformity assessment procedures are non-discriminatory and do not create unnecessary obstacles to trade.

The country also participates in meetings and activities of the following international inter-governmental bodies whose objective is to promote food safety and fair food trade, as well as, manage risks of foodborne diseases.

- Codex Alimentarius Commission (CAC): Established by the Food and Agriculture Organization (FAO) and the WHO in 1963, this is the foremost body recognised internationally for the development of food standards to ensure food safety. The Commission's mandate is to develop harmonised international food standards, guidelines and codes of practice to protect the health of consumers and ensure fair trade practices in food. The Inter-American Institute for Cooperation on Agriculture (IICA) supports the strengthening of the CODEX Contact Points and National Committees in the Caribbean, including Trinidad and Tobago.
- World Health Organization: The World Health Organization (WHO) is the directing and coordinating authority on international health within the United Nations' system. The

organization sets norms and standards for all areas in which they work and promotes their monitoring and implementation. The Regional office for the Americas is the Pan American Health Organization (PAHO), which provides technical cooperation to the Government of Trinidad and Tobago to strengthen its food safety system.

- World Organization for Animal Health (Office Internationale des Epizooties): This intergovernmental organisation is responsible for improving animal health worldwide and is recognised as a reference organisation by the World Trade Organization (WTO).

Within the Caribbean Community (CARICOM), several developments have taken place which influence the food safety policy environment. The CARICOM Regional Organisation for Standards and Quality (CROSQ) was established under Article 67 of the Revised Treaty of Chaguaramas, signed by Heads of Government in 2001. CROSQ facilitates the development of regional standards, promotes the harmonization of metrology systems and supports the sustainable production and trade of goods and services in the CARICOM Single Market and Economy (CSME). As the regional standards body, CROSQ supports national standards bodies in the Member States.

The Caribbean Agricultural Health and Food Safety Agency (CAHFSA) was established in 2010. CAHFSA is mandated to perform a coordinating and organizing role for the establishment of an effective and efficient regional SPS regime, and to execute on behalf of Member States, SPS actions and activities that can be more efficiently conducted using a regional approach. CAHFSA supports CARICOM Member States in the operations of their national agricultural health and food safety systems related to the SPS Agreement.

The Caribbean Public Health Agency (CARPHA) which was established in 2011 is mandated to assist CARICOM Member States with food safety management issues. CARPHA's mandate from a food safety perspective, relates to foodborne disease surveillance and epidemiological data collection. The agency, through its Tourism and Health Program, emphasizes monitoring and reporting of foodborne disease in the tourism sector.

“One Health” refers to an interdisciplinary approach to minimizing harms and maximizing benefits from the co-management of human, animal and environmental health. This approach is aimed at developing more efficient and effective strategies to address health issues at the human - animal - environment interface. In recognition of the potential benefits, the Caribbean One Health Policy was supported at the CARICOM Council for Trade and Economic Development (COTED), Agriculture meeting in 2013; at the CARICOM Council for Human and Social Development in 2014, and at the COTED Environment meeting in 2015. The Caribbean One Health Strategic Framework identifies Food Safety and Food Security as high priority initiatives.

In 2017, the CARICOM Secretariat completed the Model Food Safety Bill which seeks to promote food safety and food quality, trade in safe and wholesome food and to ensure compliance with international regulations in animal health, plant health and food safety.

2.4 National Policy context

Due to the inter-relationship between food safety and issues such as health, economic development, trade, and quality management, Trinidad and Tobago's Food Safety Policy must consider other relevant national policies. As such, the Food Safety Policy will be linked to and informed by the following national policy documents:

- Vision 2030- The National Development Strategy of Trinidad and Tobago 2016-2030 identifies the need to achieve food security and sustainability to ensure the supply of wholesome food to the population.
- Draft Policy- Transitioning of Local Government
- The National Strategic Plan for the Prevention and Control of Non-Communicable Diseases 2017-2021
- The Comprehensive Economic Development Plan for Tobago 2013-2017
- National Quality Policy 2018 - 2030

2.5 Situation Analysis

In 2016, the FAO engaged a food safety consultant to conduct a situation analysis on the national food safety system of Trinidad and Tobago. An international food safety consultant was subsequently contracted to facilitate a multisectoral workshop to begin the development of a national food safety policy. In 2017, national consultations were held in Trinidad and Tobago separately to discuss the work undertaken, and to obtain feedback from stakeholders in government, non-government organizations, and the food industry. Meetings with an inter-sectoral Food Safety Working Group (Appendix 1) were held intermittently from January to July 2018, and on August 23, 29 and 30, 2018 to advance discussions towards finalization of the policy. The Situation Analysis study and all subsequent deliberations have identified the following issues affecting the food safety system in Trinidad and Tobago.

2.5.1 Management of Food Control

Trinidad and Tobago's national food control system uses a multiple-agency approach, in which seven agencies share various responsibilities for food control. This multi-agency system operates without an institutionalized coordination mechanism. As a result, the national food control system is fragmented. Roles and responsibilities of various

stakeholders are not well defined, and in some instances are overlapping. There is weak collaboration among the responsible agencies and little to no systematic sharing of data and information. For example, there is little coordination of manpower resources among MoH PHIs, MoRDLG PHIs, and Veterinary PHI. Inspection activities are also performed without the use of common guidelines.

Policy and operational coordination at the national level is required to achieve effective food control. Accountability for issues and responsibility for food control activities, including overall system evaluation should be clearly defined. Due to the absence of a coordinating mechanism, the requisite leadership to oversee an integrated national food control system in Trinidad and Tobago is lacking.

2.5.2 Food Laws and Regulations

Preliminary review of existing laws and regulations for Trinidad and Tobago, in relation to the CARICOM model legislation, has revealed that there are gaps and significant amendments are needed to inter alia:

- i) support the carrying out of risk assessments and analyses using available scientific evidence;
- ii) clearly define the responsibilities of all stakeholders along the value chain;
- iii) allow for comprehensive traceability and a defined protocol for food recall; and
- iv) include and update regulations for meat, poultry, dairy products, irradiated food and genetically modified foods.

In addition to the legal amendments, provisions to support enforcement, such as training for officers and citizens need to be enhanced.

Regulations specify product characteristics or related processes for which compliance by manufacturers and importers are mandatory. They represent the minimum quality and

safety requirements that a product must meet to be allowed on the market. In developing its regulations, the CFDD utilizes regional standards developed by CROSQ.

The efficacy of national food control activities in Trinidad and Tobago is constrained by fragmented and outdated legislation. There are also challenges with compliance, due in part to limited enforcement capacity and inappropriate levels of sanctions. Modern food legislation is needed to protect human, animal, plant and environmental health, to facilitate trade and to fully meet the country's international obligations. To the extent possible, legislation should also be able to respond to changes occurring in the food environment.

2.5.3 National Food Safety Standards, Guidelines, Codes of Practice and Certification Schemes

The CFDD is the competent authority for development of food safety regulations. However, for food safety standards, codes of practice and certification schemes there are process and institutional gaps. Voluntary food safety standards can be used to support regulations (effectively with mandatory status) and can help improve trade and food safety, such as adoption of HACCP, GAP and FSSC-systems which provide assurance to consumers.

While the Trinidad and Tobago Bureau of Standards is the national standards body, based on the Standards Act, this agency does not have the legal mandate to develop food safety standards and specifications, notwithstanding this institution actively participates in regional standards setting through CROSQ.

Another issue relates to the harmonization of national food standards with those used internationally. This is a necessary precondition for boosting growth in food exports. A third issue is the local adoption and use of guidelines and codes of practice. International standards, guidelines and codes of practice for a wide range of food products, including fresh

and processed are developed by the CAC. However, since these are not fully adapted/ adopted for Trinidad and Tobago, the local food inspectorates do not have benchmarks to guide the performance of their duties. This results in confusion in the food industry. These standards can also be used for cottage or home processing industries and to guide development of small and micro business.

A regulatory agency in Trinidad and Tobago should have clear responsibility for food safety standards: to develop, to harmonize and to promote the adoption of international, regional and national food safety standards, guidelines and codes of practice. Good regulatory practice dictates that regulatory bodies should reference standards (CODEX or any other relevant standards) in regulations.

2.5.4 Foodborne Disease Surveillance, Food Monitoring and Epidemiological Data

Access to reliable data on the incidence of foodborne illnesses is critical. The disease surveillance system should, however, be linked to the monitoring activities conducted by food control agencies so that appropriate risk-based food control policy measures can be initiated. Laboratories are an essential part of the surveillance system and should have adequate capacity and quality assurance. With respect to monitoring the local food production and distribution system, ideally all stakeholders in the food chain should implement comprehensive and effective traceability and recall systems that meet national, regional and international standards. However, since it is unlikely that resources for a census like approach to food safety may be fully available, decisions to focus on sub-sectors and value chains should be a necessary part of the national food safety strategy. To implement such a strategy would require reliable and valid data.

There is negligible sharing of available data and information on the incidence of foodborne disease outbreaks in Trinidad and Tobago and there is no integrated reporting system that links foodborne disease data with food inspection data. Joint investigation of foodborne disease outbreaks across sectors does not occur as protocols to support this are lacking. Systems for disseminating information of identified or emerging risks emanating from the global environment, such as the International Food Safety Authorities Network (INFOSAN), are not fully operational. Rapid alert systems for emerging foodborne hazards are not formalized, and indeed, there is no documented national food safety emergency preparedness and response plan.

The food monitoring and foodborne diseases surveillance system in Trinidad and Tobago require considerable strengthening. Adequate infrastructure and resources to support scientific risk analysis should be put in place.

2.5.5 Communication and Public education

Surveys and interviews with stakeholders conducted as part of the Situation Analysis suggested that the multiple-agency system communicates poorly across the various entities within the system and externally with business and citizens. Some of the specific weaknesses in the food safety communication infrastructure noted by these stakeholders were: i) outdated information systems; ii) inconsistency in the production of public health alerts; iii) limited interdepartmental communication between public health, municipal corporation and veterinary public health inspectors; and iv) absence of consumer advocacy systems. With respect to public education, stakeholders felt that there was a lack of population awareness of the socio-economic importance of food safety.

There is need to improve the exchange and use of information across government agencies dealing with food safety, and to strengthen mechanisms for providing food

safety information, education and communication to businesses and citizens. To improve transparency and impartiality in decision-making, inspection protocols and other pertinent information from regulatory agencies should be shared with the industry and other relevant stakeholders.

2.6 Rationale for Food Safety Policy

The Situation Analysis and subsequent discussions identified limitations in all aspects of the national food control system—food laws, regulations and standards; food control management; inspection services; monitoring services; and information education and communication. A national food safety policy is needed to address the identified weaknesses, to stimulate behaviour change, and to guide an integrated food safety and food control system for Trinidad and Tobago.

3. THE POLICY

3.1 Scope

The Trinidad and Tobago Food Safety Policy covers all foods, (unprocessed / processed/ primary / raw/ cooked/ uncooked) both domestic and imported. With respect to domestic foods, the policy covers the whole food chain, from input supply, primary production, through all stages of processing, distribution and sale, to consumption. Regarding safe food and fair food trade practices, the consistent application of the Trinidad and Tobago Food Safety Policy to the whole food chain, will support food exports. The policy includes all public and private entities involved in the scientific, technical, operational and management aspects of food safety and control systems in the country.

3.2 Vision

To protect public health by reducing the risk of foodborne illness; to protect consumers from unsanitary, unwholesome, mislabelled or adulterated food and contribute to the economic development by maintaining consumer confidence in the food system and providing sound regulatory foundation for domestic and international trade in food in Trinidad and Tobago.

3.3 Policy Goals

The goal of the Food Safety Policy of Trinidad and Tobago is to protect public health by providing assurance of safe food from farm to fork, through a coordinated and collaborative approach among all responsible ministries, agencies and stakeholders.

3.4 Policy Objectives

The objectives are:

1. To guide modern comprehensive legislation to promote food safety in Trinidad and Tobago;
2. To establish a mechanism for coordinating food safety related activities;
3. To strengthen surveillance systems including early warning system and emergency response;
4. To harmonize and promote the adoption of international, regional and national standards, guidelines and codes of practice;
5. To strengthen the mechanism for the provision of food safety information, education and communication.

3.5 Guiding Principles

The principles underpinning the food policy are:

Principle 1: Shared responsibility

Responsibility for food safety is shared by the GORTT, industry, academia and consumers.

Principle 2: Coordination, Collaboration and Effective use of all resources

Ministries and agencies in Trinidad and Tobago with responsibility for food safety, will collaborate and coordinate, as much as possible, in the management of national food controls to minimize overlap and eliminate gaps in coverage.

Principle 3: Risk analysis; Risk Assessment; Risk Management; Risk Communication

Ministries and agencies in Trinidad and Tobago will make decisions based on scientific information, evidence and/or risk analysis as appropriate.

Principle 4: Transparency

Trinidad and Tobago is committed to a transparent food safety system, including publishing its operational manuals, and publishing results and reports, within established legal requirements with respect to privacy.

Principle 5: Continuous improvement

Trinidad and Tobago will evaluate its food safety activities, operations and resources, both across all sectors and within each ministry and agency, to facilitate continuous improvement.

3.6 Policy Recommendations

3.6.1 Food Safety Legislation

- The GORTT shall review and rationalise existing food safety legislation and enact modern legislation to give effect to the National Food Safety Policy. To respond to changes occurring in the food safety environment, legislation shall be enabling, containing provisions in the substantive Act, for the Minister with responsibility for food safety to make Regulations.
- Existing penalties shall be reviewed, and fixed penalty ticketing systems introduced, where appropriate.
- Fee schedules for inspection services shall also be reviewed and updated.

3.6.2 Coordination of the Food Safety Function

- The Minister of Health shall be the Minister with responsibility for food safety coordination. An inter-agency National Food Safety Coordinating Committee (NFSCC) shall be established to assist and advise the Minister on coordination of food safety matters.

- The NFSCC shall comprise a representative from each of the following regulatory and stakeholder agencies:
 - (a) Ministry of Health
 - (b) Ministry of Agriculture, Land and Fisheries
 - (c) Ministry of Rural Development and Local Government- Public Health Inspectorate
 - (d) Ministry of Trade and Industry
 - (e) Ministry of Tourism
 - (f) Tobago House of Assembly
 - (g) Water and Sewerage Authority
 - (h) Ministry of Finance (Customs and Excise Division)
 - (i) Ministry of Planning and Development

- The representative from the Ministry of Health shall be the Chairman and the representative from the Ministry of Agriculture, Land and Fisheries the Deputy Chairman.

- To ensure its perpetuity, the NFSCC shall be established in law. The Food and Drugs Act, Chapter 30:01 shall be so amended.

- The NFSCC shall carry out the following functions:
 - (1) Advise the Minister with responsibility for food safety on the performance of the food safety system including legislation, and steps to resolve policy and operational conflicts;

 - (2) Develop National Food Safety Strategic Plans for the efficient functioning of the multiple-agency system, including plans for mobilizing adequate resources for the operation and sustainability;

 - (3) Make recommendations for:
 - a) Rationalization of roles and functions of regulatory agencies,

 - b) Sharing of resources, across institutions, to improve efficiency of the food safety system,

 - c) Communication strategies to support integration of the food safety system and real-time sharing of data and information;

 - d) Development of Memoranda of Understandings between agencies;

 - (4) Monitor execution of agreed roles and functions among regulatory agencies;

 - (5) Develop national food safety early warning and emergency response plans and coordinate emergency food safety preparedness response, in consultation with the national agency with responsibility for disaster preparedness and response;

 - (6) Recommend investigations of food safety issues and coordinate the investigations;

 - (7) Identify national research priorities and collaborate with stakeholders to commission and undertake priority research;

(8) Prepare high level reports on the performance of the integrated food safety system for the Minister.

- In execution of its functions, the NFSCC shall be assisted by a Secretariat which shall provide technical and administrative support. The Secretariat shall be responsible to the Permanent Secretary of the Ministry of Agriculture Land and Fisheries. Placing the NFSCC under the Ministry of Health and the Secretariat under the Ministry of Agriculture Land and Fisheries is an approach to strengthen collaboration between the two regulatory agencies and to deepen inter-sectoral collaboration, which is needed for effective food safety and control.
- The Secretariat shall be provided with adequate staff with requisite qualifications and experience for the discharge of its functions.
- The NFSCC may establish sub-committees to provide technical assistance in any areas of its work. Membership on sub-committees may be drawn from national, regional and international experts in organizations such as CARPHA, FAO, Inter-American Institute for Cooperation on Agriculture, Pan American Health Organization/WHO, The University of the West Indies.

3.6.3 National Food Safety Standards, Guidelines and Codes of Practice

- The CFDD shall develop national food safety standards, guidelines and codes of practice for Trinidad and Tobago, which it shall adopt/adapt from the Codex Alimentarius. These standards and guidelines shall cover cottage or home-based industries.

- The CFDD shall be assisted by the Food Advisory Committee and the National Codex Committee (NCC), which shall *inter alia*, study Codex documents and propose to the GORTT the acceptance of the international standards, guidelines or codes of practice. Where necessary, sub-committees may be appointed to assist with technical matters.
- The CFDD shall promote the use of international standards, guidelines and codes of practice adopted from the Codex, throughout Trinidad and Tobago, and shall encourage food manufacturers to improve quality and hygiene management to meet these requirements.

3.6.4 Surveillance and Emergency Response

- The MoH shall ensure a fully functional national foodborne disease surveillance and response system is in place, including strengthened event-based, indicator-based, and sentinel surveillance and laboratory capacity. The MoH shall explore the use of Social Media or other non-traditional media for event and complaint-based surveillance and shall also make enhanced use of Geographical Information Systems.
- Systems for systematic sharing of food monitoring data, from points along the food chain, among the various national regulatory agencies shall be developed by the NFSCC.
- To provide an understanding of risks across the food chain, the GORTT shall develop an integrated food chain surveillance system that links food surveillance data and public health surveillance data.

- A risk-based approach to food inspections shall be adopted by Inspectors in regulatory agencies. Inspectors shall be provided with the requisite training, infrastructure and resources to support risk-based inspection procedures.
- All official and designated food safety analytical laboratories in Trinidad and Tobago shall be accredited by an approved accreditation body.
- The GORTT shall ensure that a functional National Food Safety Emergency Preparedness and Response system for Trinidad and Tobago is developed and is regularly tested. This system shall include early warning and rapid alert components to support timely information exchange and coordinated responses. The Food Safety Emergency Response system shall also include comprehensive traceability and a defined protocol for food recall.

3.6.5 Information, Education and Communication

- Memoranda of Understandings shall be developed and executed between portfolio Ministries and agencies for the purpose of implementing food safety legislation, coordinating operations, undertaking activities under this policy, and allocating resources.
- The GORTT shall establish an electronic one-stop-shop for food safety regulatory requirements, to allow manufacturers to submit standardized information and documents at a single-entry point. The goal of the food safety electronic one-stop-shop shall be to improve operations among regulatory agencies and to improve the efficiency of external operations with food manufacturers.

- Ministries and agencies shall, to the extent possible with available resources, provide public information and education to industry, food handlers and consumers. Public education may include general information about how to access the system; information about registration procedures; prevention and education strategies etc. To the extent possible with available resources, Ministries and agencies shall also provide information to address the specific training needs of inspectors and other food safety staff.

4. IMPLEMENTATION

4.1 Roles and Responsibilities

GORTT is responsible for identifying Ministries and agencies with a food safety mandate, establishing and maintaining food safety legislation and regulatory requirements.

Ministries and agencies are responsible for ensuring the effective operation of the national food safety system, including providing information, technical guidance and advice to industry and consumers, monitoring compliance of the food industry and taking appropriate enforcement action.

Industry (Food Businesses) has the primary responsibility for food safety and meeting regulatory requirements including use by primary producers, distributors and farmers of: Good Agricultural Practices, Good (Hygienic) Manufacturing Practices, Hazard Analysis and Critical Control Points, Quality Assurance and Control (with Trained Managers and Food Handlers).

Academic Scientific Institutions and Development Partners may contribute to the national food control system by providing expertise to support the risk based and scientific foundation.

Consumers are responsible for managing food safety risks under their control (e.g., safe food practices in the home, informed decision making and safe food choices) and should, where possible, participate in consultations on food safety practices.

5.2 Policy Implementation Plan

To fully operationalize the National Food Safety Policy, a comprehensive Strategic Plan should be developed, under the guidance of the NFSCC. This Strategic Plan should include budgetary requirements and should identify monitoring and evaluation indicators for performance of the overall system. Table 3 presents a high-level timetable for completion of key strategic activities contained in this policy. This timetable assumes that the policy will be validated and adopted by the GORTT by end of 2018. Preliminary implementation will commence in 2019 under the aegis of an Interim Steering Committee. This Committee will provide oversight and strategic direction until the NFSCC is legislated and fully operational.

Table 3: High-Level Implementation Plan

| Activity | Timeframe | | | | | |
|--|-----------|------|------|------|------|------|
| | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
| Appoint the NFSCC | Q4 | | | | | |
| Establish the NFSCC Secretariat | Q4 | | | | | |
| Review existing food safety legislation and draft Bills 1 st | | Q1 | | | | |
| Establish National Codex Committee | | Q2 | | | | |
| Amend the Food and Drugs Act to establish the NFSCC and to revise the mandate of the Food Advisory Committee | | Q3 | | | | |
| Develop Food Safety Strategic Plan with resource mobilization and Monitoring and Evaluation component | | Q3 | | | | |
| Conduct technical diagnostic review of the existing surveillance systems | | Q4 | | | | |
| Enact comprehensive modern food safety legislation | | | Q4 | | | |
| Develop Food Safety Emergency Preparedness and Response Plan | | | Q4 | | | |

| Activity | Timeframe | | | | | |
|---|-----------|------|------|------|------|------|
| | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
| Implement program for development of standards, guidelines and codes of practice | | - | - | - | - | - |
| Implement laboratory strengthening program | | - | - | - | - | - |
| Implementation of information education and communication activities informed by Strategic Plan | | - | - | - | - | - |
| Strengthen traceability and recall systems | | | - | - | - | - |
| Implement comprehensive emergency response system with early warning and rapid alerts | | | | | | Q4 |
| Develop food safety electronic one-stop shop | | | | | | Q4 |

Q Denotes the Quarter in the Calendar year the activity to be completed.

- Denotes ongoing activities.

6. MONITORING AND EVALUATION

The policy covers the period 2018 -2023, after this period, it should be comprehensively reviewed. The NFSCC shall be responsible for monitoring implementation of the National Food Safety Policy and evaluating its impact. Evaluation should include assessing the policy's effects on the health of the population. The monitoring and evaluation framework that would be developed to accompany the Strategic Plan will be very useful in this regard.

7. CONCLUSION

The National Food Safety Policy will provide the basis for a comprehensive and integrated approach to food safety in Trinidad and Tobago. This policy is in harmony with the direction articulated by the GORTT in its National Development Strategy 2016 - 2030 (Vision 2030), in the Comprehensive Economic Development Plan for Tobago 2013-2017, and the National Quality Policy 2018 – 2030. The policy is also in alignment with the CARICOM model Food Safety Bill. Full implementation will ensure Trinidad and Tobago meets internationally recognized food safety standards and guidelines, and will positively impact human and animal health, domestic and international food trade.

8. ANNEXES

Annex 1: Members of the Food Safety Working Group

| Institution | Representative |
|---|---|
| Ministry of Agriculture, Land and Fisheries | Advisor to the Honourable Minister |
| Ministry of Health | Director- Chemistry, Food and Drugs Division |
| | Director- Veterinary Public Health |
| | Director- Health Education Division |
| | Chief Public Health Inspector |
| | County Medical Office of Health |
| Ministry of Planning and Development | Monitoring and Evaluation Officer |
| Ministry of Local Government and Rural Development | Chief Public Health Inspector |
| Ministry of Trade and Industry | Industry Specialist |
| Food and Agriculture Organization of the United Nations | FAO Assistant Representative (Trinidad and Tobago/Suriname) |
| | FAO National Operations Officer |
| | FAO Programme Assistant |
| Pan American Health Organization | Advisor on Veterinary Public Health |
| Tobago House of Assembly- Division of Tourism, Culture and Transportation | Cultural Officer I |
| Tobago House of Assembly- Division of Health, Wellness and Family Development | Public Health Inspector |
| Tobago House of Assembly- Division of Food Production, Forestry and Fisheries | Post-Harvest Technologist |

Annex 2: Glossary of Key Terms

| | |
|--------------------------|--|
| Accurately labelled | Any legend, word or mark attached to, included in, belonging to or accompanying any food approved by the Competent Authority according to the Food and Drugs Act, Chapter 30:01. |
| Early warning | The detection and recognition of a public health or food safety event that comes early enough to allow for adequate preparation to prevent or minimize the negative impacts of the event. |
| Event-based surveillance | The organized collection, monitoring, assessment and interpretation of unstructured information about health events that may represent a risk to public health. |
| Food chain | The series of processes that food goes through; it includes primary production (including feeds, agricultural practices and environmental conditions), product design and processing, transport, storage, distribution, marketing, preparation and consumption. |
| Food control | A mandatory regulatory activity of enforcement by national or local authorities to provide consumer protection and ensure that all foods during production, handling, storage, processing and distribution are safe, wholesome and fit for human consumption; conform to quality and safety requirements; and are honestly and accurately labelled as prescribed by law. |

| | |
|------------------------------------|--|
| Food safety event | Includes contamination of food or food products by micro-organisms, toxins, foreign matter, chemicals; excess moisture content; degradation of the nutritional value or pest infestation. |
| Food surveillance | The continuous monitoring of the food supply to ensure consumers are not exposed to components in foods, such as chemical contaminants or biological hazards, which pose a risk to health. |
| Monitoring | The routine and continuous tracking of the implementation of planned surveillance activities and of the overall performance of the surveillance and response system. |
| Hazard | An agent that has the potential to cause adverse health effects in exposed populations. |
| Indicator-based surveillance | The regular, systematic collection, monitoring, analysis and interpretation of structured data, i.e. of indicators produced by well identified, mostly health-based, formal sources. |
| Integrated food chain surveillance | The routine sharing of data and information between the public health, food safety and animal health sectors in order to direct control measures to minimize the burden of foodborne diseases. |
| Rapid alert system | A tool that allows for the timely exchange of information so that rapid and coordinated responses can be initiated. |
| Regulations | A rule or directive made and maintained by an authority. |
| Risk Analysis | A process consisting of three components: risk assessment, risk management and risk communication. |

| | |
|--------------------|---|
| Risk Assessment | The scientific evaluation of known or potential adverse health effects resulting from human exposure to food-borne hazards. It usually consists of the following steps: (i) hazard identification, (ii) hazard characterisation, (iii) exposure assessment, (iv) risk characterisation. |
| Risk Communication | An interactive process of exchange of information and opinion on risk among risk assessors, risk managers and other interested parties. |
| Risk Management | The process of weighing policy to accept, minimise or reduce assessed risk and to select and implement appropriate options. |
| Standards | A document that provides technical specifications or other precise criteria to be used constantly as rules, guidelines or definitions of characteristics, to ensure materials, products, processes and services are fit for their intended purposes |