

Development of Food Safety Systems Action Plan (Armenia)

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A. Action Plan Topic

1. Action Plan Title

Bringing the food safety systems of Armenia into compliance with international standards

2. Action Plan Topic

Policy of Quality Grades Standardization and Sanitation Management of Agri-foods

3. Related work in your organization

- Development of legal mechanisms
Approval of a new strategy
- Introduction of risk-based food safety systems per international standards and inspections
- Creation of a platform for effective cooperation between state and private bodies and coordination of export issues

B. Action Plan Description

1. Background and Purpose

Food safety is one of the target areas of the World Trade Organization and a number of other international organizations (Food and Agriculture Organization of the United Nations, the World Health Organization), currently being a strategic, priority area in many developing and developed countries. In some countries, food safety is under the direct control of the government. Likewise, in the Republic of Armenia, the FSIB is an inspection body under the government.

The food safety sector modernization, the introduction of international principles, criteria, and standards have been rather drawn-out in Armenia since independence, till 2010. A gap assessment was implemented before the ratification of the concept of food safety reforms in the Republic of Armenia, the concept being developed in line with the current situation.

In 2010, the Government of the Republic of Armenia initiated the development of a food safety capacity building concept. It's worth noting that one of the targets was market diversification, in particular, the promotion of exports from Armenia to EU markets, given the fact that Armenia had joined the GSP + system. Besides, one of the requirements of the Deep and Comprehensive Free Trade Agreement between the

Republic of Armenia and the EU was the approximation of the legislation in the field of sanitation and phytosanitary to the EU standards.

Nevertheless, it should be noted that in 2010 food producers, importers, as well as exporters were not sufficiently aware of local and international food safety requirements and standards. From 2010 to 2013, EU legislation was the basis for both legislative and quality infrastructure development programs.

On October 11, 2010, the decision N 835-N was developed and adopted.

Following the conclusion submitted to the Government of Armenia by the experts of the EU Advisory Group, one of the requirements of food safety reform measures is the implementation of Article 36 of the Basic Law on Food Safety of the European Union (EC 178/2002) and the appointment of competent scientific centers responsible for food safety risk assessment.

Scientific centers should support the Food Safety Authority to provide a scientific basis for action. According to the 8th point of the appendix to the RA Prime Minister's decision N 835-N as of October 11, 2010, it was proposed to establish an information-analytical center in the Center for Ecological-Noosphere Studies under the National Academy of Sciences of the Republic of Armenia for the assessment of the risks in the food chain.

On May 5, 2011, the Government of the Republic of Armenia adopted a decision to rename the Scientific Center for Animal Husbandry and Veterinary Medicine SNCO and to make changes and additions to Decision No. 576 of April 14, 2004, according to which the Scientific Center for Animal Husbandry and Veterinary Medicine SNCO was renamed as the Food Safety Risk Assessment and Analysis Scientific Center State Non-Commercial Organization, with the function of food safety, veterinary medicine, phytosanitary risks analysis being added to the existing activity directions.

This action plan aims modernization of food safety systems is essential for export promotion and solving food safety and public health issues in the country. Thus, a new policy should be established based on the needs of all beneficiaries through the development of mechanisms for sustainable and effective cooperation between participants.

2. Current Status and Issues

2.1. Current Situation

The strategy for the development of the RA food safety system was approved by the RA Government protocol decision N 45 of November 17, 2011. The strategy aims at the introduction of the basic European

Union food safety principles.

The strategy consists of the following chapters.

- I. Introduction
- II. General provisions
- III. Characteristics of the macroeconomic situation and the agrarian sector of the economy
- IV. Food safety system reforms
- V. Basic food safety principles in the European Union and its member states
- VI. The main goal and objectives of the strategy
- VII. The main strategy directions
- VIII. Strategy implementation mechanisms, expected results, and monitoring

The given strategy defines the main directions of the RA food safety system development, following the best international experience, particularly that of the European Union member states. According to the strategy, **the activities of institutional entities should be consistently improved, and steps should be taken to increase the efficiency of risk-based inspection activities.**

The strategy aims at the food safety system establishment, which will promote food safety enhancement in the Republic of Armenia and increase the competitiveness of locally produced food in foreign and domestic markets, thus creating preconditions for a deep and comprehensive free trade agreement with the EU.

The strategy is based on the requirements of the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures, the EU-Armenia Partnership and Cooperation Agreement (PCA), the European Neighborhood Policy Action Plan, the EU Eastern Partnership policy, as well as several strategic legal acts, adopted in Armenia.

Given that the introduction of a food safety system meeting the requirements of the European Union is a complex, scientific, costly, labor-intensive, and time-consuming process, rather crucial is the effective cooperation between all the state and non-state stakeholders, as well as the donor-community support in the involvement of the required funds.

It should be noted that the strategy was developed within the frames of the negotiation process of the Deep and Comprehensive Free Trade Agreement with the EU. It is a comprehensive and ambitious document, the development of which involved both the public sector and the representatives of international organizations, national consultants, as well as international experts, in particular, the experts of the EU Advisory Group SPS and TBT sectors.

Although some strategy provisions were planned to be completed by 2015, the change of political course in Armenia, mainly Armenia's accession to the EAEU, had a significant impact on the implementation of the food safety reforms and the strategy in Armenia. The ideology and philosophy of the current food safety system in Armenia differ significantly from the provisions set out in the strategy.

The strategy defines advanced principles, which are currently widely applied throughout the world, and though several principles have been stipulated in the RA law as well, they have not been put into practice.

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2.2. *Issues and Problems*

Identifying the current problems and issues of your part of the organization.

The issues and problems can be addressed through pictures, tables, figures, rationales, and other possible materials.

Please describe them as much detailed and clear as possible.

Activities planned but not implemented according to the Strategy

1. Approximation of the horizontal and vertical legislation on RA Food and feed safety should have been carried out by developing **reference laboratories in the field of food safety, introducing HACCP principles**, using the system of continuous training of specialists responsible for food chain control, by introducing the methodology of inspectors, implementing awareness-raising campaigns.

No national reference laboratories have been designated in the field of food safety.

Although the Reference Laboratory Center branch of the National Center for Disease Control and Prevention state non-commercial organization (NCDCP SNCO) contains the term "reference" and it seems that the latter comes from the legal regulations of Articles 27-28 of the Law on the State Control of Food Safety, the latter is just a name, there are no reference laboratories designated by law.

The HACCP system is the most effective preventive system for controlling food safety production risks, as well as biological and chemical hazards. HACCP system enabled the food business operators to take on a greater responsibility to reduce food safety risks by increasing consumer protection, improving the food processing industry, and promoting the international food trade.

One of the prerequisites for the implementation of the system is the full implementation of good agricultural practices (GAPs), as well as good manufacturing practices (GMPs).

Even though the HACCP system is mandatory under the legislation of the Republic of Armenia and the requirements of the EAEU Technical Regulation, it is not widespread in the Republic of Armenia. **State control of food safety in the Republic of Armenia and the checklist are not based on the CCP control, the requirement to introduce the system is not mandatory at the time of registration of economic entities.**

No register of economic entities, approved by the HACCP system plans, is in place. There is no legal act governing the procedure for rejecting or approving HACCP plans submitted by economic entities and the legal relationships. Many businesses receive compliance declarations without a certificate from the Authorized Body.

Many businesses receive compliance declarations without a reference on the system implementation from the Authorized Body.

Summarizing the mentioned provisions, it can be stated that neither in the period approved by the strategy nor in the present, the provision of the system development with the development of reference laboratories in the field of food safety and the introduction of HACCP principles have not been implemented.

2. The composition of the council established by the RA Prime Minister's decision N 1145-A of November 30, 2011, didn't undergo further changes. Taking into account the fact that Mr. Kushkryan hasn't held the post of minister since 2012, de facto council hasn't functioned since then.
3. The most important principle of legislative-administrative reforms is the principle of traceability, which could be ensured through the establishment of **an animal numbering system. It should be noted that the numbering system**

was not established during the implementation of the strategy. The program has already been developed and approved.

4. Monitoring and control of veterinary drug residues in live animals.
5. Although the RA Prime Minister's Decision N 1145 of November 30, 2011, has not been revoked, except for the amendment of 2012, the composition has not been revised, however, from the names of the agencies defined in the legal act, as well as from the names of those responsible, it is clear no actual interministerial working group in the field of sanitary and phytosanitary has functioned during the recent years, as its composition involves specialists that left the system long ago. Moreover, following the RA Government Decision N 857-N of July 25, 2012, the State Hygienic-Anti-Epidemic Inspectorate of the RA Ministry of Health and the State Labor Inspectorate of the RA Ministry of Labor and Social Affairs were merged and reorganized into the State Health Inspectorate of the RA Ministry of Health staff. Hence, it becomes clear that the group has not operated since 2013.
6. By the decision of the Prime Minister of the Republic of Armenia N 995-A of October 15, 2012, the program of approximation with the legislation on food safety, veterinary medicine, and phytosanitary was approved but was left unexecuted due to the membership of the Republic of Armenia in the EAEU.
7. State control of food safety in the Republic of Armenia and the checklist are not based on the CCP control, the requirement to introduce the system is not obligatory during the registration of economic entities as well.
8. No research capacity improvement programs have been approved and implemented.
9. No research has been carried out by the Food Safety Risk Assessment and Analysis Scientific Center SNCO during the years 2013-17, as the scientific center does not have technically equipped laboratory facilities in that field.
10. No accessible database approved by the strategy has been created.
11. The introduction of animal housing areas registration systems has not been carried out within the period stipulated by the strategy.

2.3. *Relevant Policies and Programs*

List relevant policies, programs or organizations (structure) and describe them as clear as possible. You are asked to explain how the listed policies and programs are related to the problems.

Taking into account the lack of risk assessment capacity in Armenia, the Center for Ecological-Noosphere Studies of the National Academy of Sciences of the Republic of Armenia, through the intermediation of the Government of the Republic of Armenia, received a **CABUFOSE (Food Safety Capacity Building)** grant program funded by the Government of Italy in 2011. The aim of the project was to train food safety risk assessment specialists in the Republic of Armenia.

As a result of the project, a two-week summer school was organized in Yerevan, following which the best participants visited the Italian National Institute of Health for a two-week exchange of experience.

https://www.unece.org/fileadmin/DAM/env/esd/7thMeetSC/Country_Reports/Armenia.pdf

EU Twinning Program on Strengthening Animal Origin Food and Feed Safety Control in Armenia

The project aims at strengthening the institutional capacity by upgrading the animal-origin food and feed safety control systems following the best EU practice and international standards and raising consumer awareness on food safety.

As a result of the project, the program of approximation of legislation, ten RA Government decrees, three new laws, ten internal legal acts of the SSFS, 21 checklists have been developed. The internal structure, functions, competency requirements have been designed. All the necessary trainings for the staff have been implemented, the website has been improved.

<https://mineconomy.am/page/776>

Food Safety Capacity Building Grant Program funded by the World Bank Institutional Development Fund (IDF)

The aim of this program is to develop institutional capacity in the field of food safety to improve food safety throughout the entire food chain.

The results of the project include the development of a food safety strategy and action plan, Armenia's accession to the EU Rapid Alert System, the expansion of EU exports

(including fish and fish products), and the establishment of an aquaculture disease control system.

<http://documents1.worldbank.org/curated/en/233981468005951865/pdf/ISR-Disclosable-P129168-11272012-1354074149321.pdf>


The Food and Agriculture Organization is implementing a program to strengthen food safety, animal health risk assessment, and management capacity. The project aims to support the improvement of food safety, animal and plant health risk evidence, and data source identification and assessment activities.


The project should assist in developing appropriate controls through the introduction of risk management mechanisms. Also, the capacities of food business operators on food safety management systems, and inspection services on risk categorization should be improved.

<http://www.fao.org/armenia/news/detail-events/en/c/1196997/>

3. Proposed Goals

<Gap Analysis>

“As Is” vs. “To Be”	
 To Be	<ol style="list-style-type: none">1. <i>Farm to fork principle should be practically applied in Armenia.</i>2. <i>The electronic tracking system should be required for full control of food safety in Armenia.</i>3. <i>Strengthening of food safety capabilities in Risk management</i>

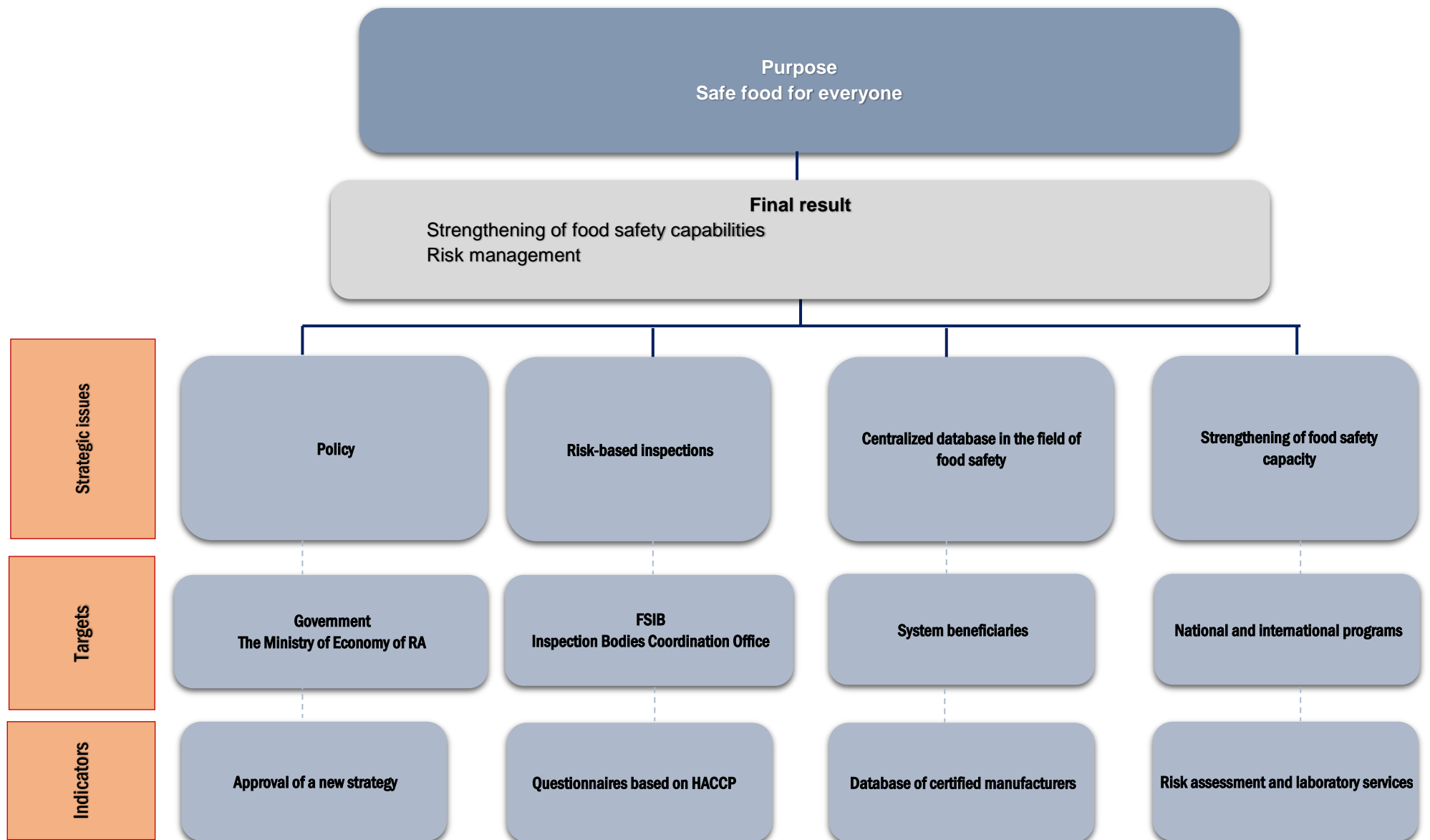
 As Is	<ol style="list-style-type: none"> 1. <i>Farm to fork principle has been fixed, but it has not received a practical application in Armenia.</i> 2. <i>The electronic tracking system required for full control of food safety in Armenia is not introduced, the main obstacles are the lack of an animal numbering system, as well as the fact that raw materials of plant origin can be sold in Armenia without accompanying safety documents.</i> 3. <i>No scientific center is authorized to carry out a risk assessment in the Republic of Armenia by the RA Government Decree, hence, it can be stated that risk management does not work in the Republic of Armenia.</i>
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- Describe AS IS –TO BE analysis
 - Review of the current legislation of the Republic, including implementation of amendments and addenda to the by-laws, as well as the adoption of several new laws and sub-laws to bring them in line with international requirements. The sphere of GMOs is not regulated yet, several principles are defined by law, but the mechanisms have not yet been approved by sub-laws, there is no risk assessment body, HACCP provisions aren't included in inspection questionnaires, no sanctions are imposed in case of the detection of residual materials, issue of unreliable certificates for laboratory examination, as well as the sale of goods with incomplete or false declarations.
 - Improving the activities of institutional entities, developing new capacities following the standards of international legislation, due to which the functions of state-authorized bodies will be clarified, harmonized with the legislation, a network of laboratories will be established, and a reference laboratory will be appointed. In the framework of institutional reforms, attention should be paid to the establishment of a new SPS interdepartmental working group and raising the qualification of participants.
 - Particular importance is attached to the strengthening of the institutional abilities of existing institutions in the sphere of food safety, veterinary and phytosanitary, especially in the field of risk assessment. It's necessary to improve the laboratory and technical capabilities.
 - The traceability principle should be applied to ensure the effectiveness of administrative reforms. It's necessary to take effective steps in this direction, as there are serious gaps in the stage of supply of raw materials, a number of products of both plant and animal origin are circulated without the relevant accompanying documents.
 - Development of new mechanisms for the introduction of the HACCP system. The system implementation will require financial and technical support, thus support programs need to be developed. Besides, the HACCP system mandatory implementation requirement can be included in the procurement procedure.
 - Implementation of the risk-based audits and HACCP audit, inspections, and monitoring programs based on assessed risks, effective budget expenditures.
 - Implementation of programs to support the competitiveness of organic agriculture, as well as the food industry, taking into account the preferences of consumers in international markets and the mechanisms of quality assurance.
 - Introduction of ISO 22000 and other food safety management standards. It's necessary to take into account the exported food and the market, in case of unprocessed goods, the GlobalGap system may be enough.
 - Education and training for food safety specialists.

4. Strategy and Action Plan Concept

Steps to implement the reform program





5. Outline of the Action Plan

Issue	Suggested action	Priority	Expected result	Deadline	Responsible structure
Establishment of a coordinating working group	1. Establishment of a work coordination team	High	Establish a coordinating working group in the RA Ministry of Economy, which will provide a platform for cooperation involving all beneficiaries	The first decade of February 2021	The Ministry of Economy of RA
	2. Formation of a new working group on sanitary and phytosanitary	High	Recognize the Decree N 711 dated July 26, 2011, as invalid and create a new group, including those responsible for the sanitary and phytosanitary sphere	The second decade of February 2021	RA Government Staff
	3. Establishment of a coordinating council for the implementation of food safety strategy	High	Recognize the Decree of the RA Prime Minister N 1145 – A dated November 30, 2011, as invalid and establish a new coordinating council, which will approve the new strategy and supervise the implementation works	The third decade of February 2021	RA Government Staff
Market opportunity assessment	4. Assess the market opportunities of exporting countries and the competitiveness of Armenian goods, the pricing policy in particular.	High	The coordinating team should involve all beneficiaries, including research organizations in this sphere, NGOs, and exporters' unions, establish a roadmap outlining a list of competing products in	The first decade of April 2021	The Ministry of Economy of RA

			different countries' markets		
Institutional field and legal framework	5. Conformity of the structure and functions of the food safety inspection body with national and international standards.	High	In the field of food safety, the model of a unified body is effective. At present, the legislative field of the RA corresponds to the functions of the SSFS, including risk management. Currently, the FSIB does not deal with policy issues, thus there is a need to either re-adopt the model of a unified body or review the legislation and define clear functions.	The first decade of July 2021	RA Government Staff Inspection Bodies Coordination Office FSIB
	6. Legal regulation on genetically modified organisms (GMOs) for protection of the interests of consumers, biodiversity protection of the environment, animal health and welfare, human life and health in national legislation containing the food and feed regulation provisions.	Mid	Adoption of a GMO law defining rules and requirements	The third decade of September 2021	The Ministry of Economy of RA

Inspections and monitoring	7. Export issues should be taken into account during inspections and monitoring and costs should be justified.	Mid	Evaluate the effectiveness of monitoring programs implemented in the last five years in terms of cost recovery. All resources should be focused on products that have great export potential, and producers are ready to co-finance the work.	The first decade of June 2021	The Ministry of Economy of RA Inspection Bodies Coordination Office FSIB
Diagnostic and laboratory capacity	8. Development of mechanisms for creating a network of laboratories and clear identification of necessary human and technical resources Assessment of the current situation, including human and technical resources, gap assessment and needs analysis	Mid	It's necessary to create a network of laboratories that will be able to cover the laboratory examination of all products to be exported and will receive international accreditation in this field.	The first decade of August 2021	The Ministry of Economy of RA FSIB RVSPCLS
	9. Designation of a reference laboratory for diseases and infections of farm animals, particularly, those defined by the OIE.	Mid	Compliance with disease diagnostics guidelines published by the OIE	The first decade of July 2021	Government of the Republic of Armenia The Ministry of Economy of RA
	10. Appoint a national reference laboratory in the field of food safety	Mid	It's necessary to conduct an audit, as a result of which to appoint a reference laboratory	The third decade of September 2021	The Ministry of Economy of RA FSIB
Risk assessment	11. Designation of scientific centers for risk assessment in the field of food safety,	High	Implementation of risk-based measures in the field of food safety	The third decade of June 2021	The Ministry of Economy of RA FSIB

	veterinary and phytosanitary				
	12. Development of an annual action plan for risk assessment in the field of food safety, veterinary, and phytosanitary, including the methodology of research programs	Mid	Definition of priority tasks and cost-effectiveness assessment and development of the first-year program	The third decade of October 2021	The Ministry of Economy of RA FSIB
Food safety compliance during production and processing	13. Development of HACCP system implementation guidelines	Mid	Implementation of HACCP principles, based on Codex Alimentarius	The third decade of October 2021	The Ministry of Economy of RA FSIB
	14. Development and adoption of guidelines to ensure traceability throughout the food chain	Mid	Ensuring the traceability of the food chain	The first decade of December 2021	The Ministry of Economy of RA FSIB
	15. Development of verification questionnaires based on the HACCP principles	High	Definition of administrative sanctions	The first decade of June 2021	The Ministry of Economy of RA FSIB
	16. HACCP plan approval or rejection rules endorsement.	High	Development of rules	The first decade of June 2021	The Ministry of Economy of RA FSIB
	17. Establishment of a mandatory requirement for the introduction of the HACCP in the food procurement process	High	Ensuring supplied food safety and promoting system implementation	The first decade of June 2021	The Ministry of Economy of RA The Ministry of Finance of RA FSIB

	18. Development of the program for the promotion of Global Gap System and ISO 22000	Mid	Approval of the implementation plan and schedule	December 2021	The Ministry of Economy of RA
	19. Implementation of support programs for introduction of ISO 22000 and Global Gap system	Low	Approval of the assistance program	The first decade of December 2022	
	20. Creating a database of certified manufacturers	Low	Collection of information from certification bodies and manufacturers and creation of a database	The first decade of March 2022	The Ministry of Economy of RA FSIB
	21. Improving the database of registration of foodborne diseases and classification by chemical, bacteriological, toxicological	Low	Database for registration of foodborne illness	The first decade of March 2022	The Ministry of Economy of RA The Ministry of Health of RA FSIB
Implementation of continuous education and research programs	22. Continuous improvement of food safety education and implementation of thematic research programs to assess and improve the current situation in the Republic of Armenia	Low	Conducting thematic competitions	The first decade of March 2022	The Ministry of Economy of RA The RA Ministry of Education, Science, Culture, and Sport

6. Cooperation Plan with Korea

Korea could support Armenia Implementation of to implement support programs for introduction of ISO 22000 and Global Gap system. These programs can be jointly implemented on a co sharing basis together with RA Government.

