“SA Good Agric. Practices and how it relates to Globally recognized GAP’s”

-International food safety restrictions and requirements when exporting-

International Harmonization Workshop on Commercial Quality Standards for Fresh Fruit and Vegetables for Countries of Africa
20 -22 April 2010

Manager: Certifications
Nigel Alexander
Presentation summary

- Putting South Africa horticultural exports into perspective
- What alternative food safety standards impact your export capabilities?
- Benchmarking the SA food safety situation against the international arena
- Status of emerging farmers sector
Current reality

- Fruit production largely export-driven
  - At least 40% of South African production exported to over 60 countries
  - Earns R8 billion in foreign exchange

New era market trends

- Quality
  - Expected and specified by buyer
New era market trends

- Safe food
  Non-negotiable

- Environmental safety
  Non-negotiable

- Social accountability and people safety
  Non-negotiable

- Agriculture – major contributor: agrochemicals
EU General Food Law – January 2006

- Regulation (EC) No 178/2002 - laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety.

- Regulation (EC) No 882/2004 - on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

- Regulation (EC) No 852/2004 - Hygiene of foodstuffs


Existing Directives and Decisions that are not going to be repealed in the future by one of the new Regulations
Food Law in context for 3rd countries

Implication to 3rd countries: Import control- ‘food must be safe’

BORDER CONTROL within MS, inspected by MS officials: Risk based
• What country? What crop? What season?

FVO
Collate plans from MS & identify gaps
(Inspection of member states and 3rd countries on behalf of member states – audit plan)

National MS Control Plan
Control plan per member state country
Member States

General Food Law EC 178/2002
Supervised and inspected in the EU
Importers
“It is the responsibility of the importer to show due diligence”

Commercial Agreements
Exporters of Third countries
Third country requirements:
-ISO 17025 accredited labs.
-Official controls
Impact on 3rd countries - summarized

- On EC request 3rd countries to provide up to date information on their SPS regulations, control and risk assessment procedures
  - Equivalency
  - Specific agreements
- Importer has to ensure compliance EU Food Law
- FBO’s (Food Business Operators) to respect the following
  - Monitor food safety of products and processes
  - Registration of establishments
  - Procedures based on HACCP principles
  - General hygiene provisions for primary production
  - Requirements after primary production
Hygiene requirements – FBO’s in 3rd countries

- FBO to monitor the food safety of products and processes under his/her responsibility
- Hygiene provisions for primary production
- Detailed hygiene requirements after primary production
- For certain products, microbial requirements
- Off-farm procedures based on HACCP principles
- Registration of establishments with competent authority
**SA response and legislation implemented**

<table>
<thead>
<tr>
<th>Legislation</th>
<th>Requirement</th>
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<tbody>
<tr>
<td><strong>R707</strong>, 13 May 2005 (export) APS Act 119 of 1990</td>
<td>Hygiene &amp; GAP for on-farm and GMP and HACCP principles for off-farm FBO’s</td>
</tr>
<tr>
<td><strong>R908</strong> (local) Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972</td>
<td>HACCP – packing sheds</td>
</tr>
<tr>
<td><strong>R918</strong> (local) Health Act 63 of 1977</td>
<td>Hygiene certificate of acceptability</td>
</tr>
<tr>
<td>Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972</td>
<td>Chemical use (MRL’s)</td>
</tr>
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SA Food Safety Controls in the Supply chain

- **COMMERCIAL**
  - Retailer standards
  - HACCP, ISO 22000, BRC, IFS
  - GlobalGap, TNC, F2F

- **DoH**
  - R908/R918
  - MRL’s

- **PPECB Act**
  - Hygiene & Temp.

- **SUPPLY CHAIN**
  - Consumer
  - Supermarket
  - Shipping Vessel
  - Container Depot
  - Holding Store
  - Road Transport
  - Coldstore
  - Processing
  - Off-Farm PH
  - On-Farm Packhouse
  - Farm

- **OFSS (APS Act)**
  - Hygiene + GAP/GMP

- **Act 36**
  - Reg. of chemicals

- **Hygiene + GMP, GHP + HACCP Principles**

- **Reg. of chemicals**
# GlobalGAP vs. “SAGAP”

<table>
<thead>
<tr>
<th>GLOBALGAP</th>
<th>“SAGAP”</th>
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</thead>
<tbody>
<tr>
<td>Accredited Scheme</td>
<td>Legislative requirement</td>
</tr>
<tr>
<td>Focused on food safety, environmental and social aspects</td>
<td>Focused on food safety</td>
</tr>
<tr>
<td>Aimed at primary production</td>
<td>Covers the entire export logistical chain</td>
</tr>
<tr>
<td>Annual audits</td>
<td>Risked based approach to audits</td>
</tr>
<tr>
<td>Accepted as meeting “SAGAP” requirements when audited by an Accredited CB</td>
<td>Equivalent to GlobalGAP food safety requirements / not benchmarked to GlobalGAP</td>
</tr>
<tr>
<td>Pricing free market driven by supply and demand</td>
<td>Cost recovery</td>
</tr>
<tr>
<td>Option 2 for small holders</td>
<td>Depends on legal entity</td>
</tr>
<tr>
<td>Integrity monitored by CIPRO</td>
<td>Integrity monitored by DAFF/EU</td>
</tr>
</tbody>
</table>
Emerging sector - small scale farmers

- “SAGAP” used as entrance (minimum legal requirement)
- Emerging producers migrating to other commercial schemes – GlobalGAP
- Currently 15 emerging farmers compliant to R707
- Stumbling blocks to achieve commercial certifications
  1. Product and water testing
  2. Training
  3. Cost of audits
  4. Record keeping
  5. Cultural practices
“Compromising on food safety is not a way for a farm or a company to reduce costs. It is actually a very dangerous path, not only for consumers, but also for the farm or company itself and for the sector and country as a whole”.

David Byrne, European Commissioner for Health and Consumer Protection
Product quality and food safety:

YOUR PASSPORT TO INTERNATIONAL TRADE