



UNITED NATIONS  
INDUSTRIAL DEVELOPMENT ORGANIZATION



# ASSESSMENT ON BORDER AND IMPORT/EXPORT CONTROL PRACTICES RELATED TO FOOD OF ANIMAL ORIGIN AND VETERINARY SUPPORT PRODUCTS

United Nations for Industrial Development Organization (UNIDO)  
December 2023



WORLD BANK GROUP

## **Deliverable 1.1.7 on**

### **Assessment on Border and Import/Export Control Practices Related to Food of Animal Origin and Veterinary Support Products**

#### **Work package 74, Sub-activity 1.7**

Conduct an analysis of how current food safety regulations regulate the import and export operations of animal origin food products as well as veterinary support products. In addition, how controls on food safety are conducted at borders, with reference to required documentation, test results and certification

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## Abbreviations and Acronyms

|       |  |
|-------|--|
| AMR   | Antimicrobial Resistance   |
| ALOP  | Acceptable Level of Protection   |
| BFSA  | Bangladesh Food Safety Authority, within Ministry of Food                            |
| BSTI  | Bangladesh Standards and Testing Institute, within the Ministry of Industries        |
| CA    | Competent Authority  |
| CDIL  | Central Disease Investigation Laboratory   |
| CVASU | Chattogram Veterinary and Animal Sciences University                                 |
| DNCR  | Directorate of National Consumer Rights Protection, within the Ministry of Commerce. |
| DGDA  | Directorate General of Drug Administration, within the Ministry of Health            |
| DLO   | District Livestock Officer   |
| DLS   | Department of Livestock Services, within the Ministry of Fisheries and Livestock     |
| FBO   | Food Business Operator   |
| GAHP  | Good Animal Husbandry Practices  |
| GHP   | Good Hygienic Practices  |
| ISO   | International Organization for Standardization                                       |
| LDDP  | Livestock and Dairy Development Project  |
| MoC   | Ministry of Commerce   |
| MoF   | Ministry of Finance  |
| MoFL  | Ministry of Fisheries and Livestock  |
| MRL   | Maximum Residue Limit  |
| PVS   | Performance of Veterinary Services   |
| QA    | Quality Assurance  |
| QC    | Quality Control  |
| SPS   | Sanitary and Phytosanitary (Agreement of WTO)  |
| TAHC  | Terrestrial Animal Health Code   |
| UNIDO | United Nations Industrial Development Organization                                   |
| VA    | Veterinary Authority   |
| WOAH  | World Organisation for Animal Health (formerly OIE)                                  |
| WHO   | World Health Organization  |
| WTO   | World Trade Organization   |

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# EXECUTIVE SUMMARY

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This Paper, entitled “Assessment on Border and Import/Export Control Practices Related to Food of Animal Origin and Veterinary Support Products” is prepared in response to Activity number 1.1.7 of the Inception Report - “Conduct an analysis of how current food safety regulations regulate the import and export operations of animal origin food products as well as veterinary support products. In addition, how controls on food safety are conducted at borders, with reference to required documentation, test results and certification.”

Part 2 of this assessment on current import / export and border control activities, the “Background” - provides a brief overview of the roles and responsibilities of the Competent Authorities which hold a legal mandate, under existing legislation, to take responsibility for the regulation of the import and export of live animals and animal products.

Part 3 of the Report, introduces the international institutions with responsibility for setting standards that govern the international trade of animals and animal products, the World Trade Organisation (WTO) responsible for administration and implementation of the Sanitary and Phytosanitary (SPS) Agreement and the World Organisation for Animal Health (WOAH) which provides guidelines and sets technical standards to be followed by Member Countries to ensure safe trade of commodities in the Terrestrial (and Aquatic) Animal Health Codes (TAHC). This Part briefly explains the mandate provided by the SPS Agreement to the WOAH and explains the circumstances under which Risk Analysis should be applied by an importing country when defining the sanitary measures to be complied with by an exporting country for the import of commodities into Bangladesh.

Detailed protocols, outlining the activities and legislative requirements for import and export of live animals and animal products, based on the provisions of the SPS Agreement and the TAHC are provided in Sections 3.3. and 3.4

Part 4 of the Report provides a more detailed analysis of the most important existing legislation governing the import and export of each of the commodities listed in Part 2.1 below, as livestock production inputs and veterinary support materials, which can affect, either directly or indirectly, the food safety of animal products. The analysis reveals the more important gaps and overlaps in the various legislative instruments administered by each of the Competent Authorities with an interest in border control to ensure the safety of imports and export of all such commodities.

The principal legislation and the subsidiary Rules which provide the DLS and other Competent Authorities with a mandate to regulate the importation and export of all such commodities analysed within the scope of this study include the following:

- 1 Animal and Animal Product Quarantine Act, (2005) (MoFL)
- 2 Fish Feed and Animal Feed Act (2010), Animal Feed Rules (2013) (MoFL)
- 3 Imports and Exports (Control) Act, (1950) (MoC)

- 4 Customs Act (1969) (MoC)
- 5 Import Policy Orders (2012-2015 full English translation)& (2021-2024 Bangla version with limited English translation)
- 6 Drugs Act (1940), Drug Rules (1945 and 1946) (MoH)
- 7 Drug Control Ordinance (1982), (MoH)
- 8 National Drug Policy (2005) (MoHFW)

Part 5 describes the current practices being employed for the control of import and export of such commodities in Bangladesh in terms of issuance of permits and certificates and border control inspections, sampling and testing of animals and animal products, quarantine of imported / exported commodities.

Part 6 of the Report provides a summary of the most important gaps, overlaps and shortcomings in the existing (principal and secondary) legislation and provides a series of recommendations under three broad areas of interest:

- 6.1 Structure and Organisation of the DLS for Import / Export and Border Controls.
- 6.2 Review and revision of legislation.
- 6.3 Capacity building – Human resources and Infrastructures.

## **BACKGROUND**

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### **1. Border control in relation to food safety of animal products**

The food safety of animal products destined for human consumption is dependent on healthy livestock and adoption of good animal husbandry practices (GAHP) and good hygiene practices (GHP) along each of the livestock value chains.

Furthermore, human and animal health as well as food safety of animal products depends on the use of good quality and safe livestock production inputs and veterinary support materials.

Such livestock and livestock production inputs and veterinary support materials which may be needed to be imported or exported include:

- Animals, animal products, including animal by products;
- Animal feeds, including raw materials and other ingredients or additives used in the manufacture of animal feeds;

- Animal genetic materials;
- Veterinary medicines and biologics, including animal vaccines;
- Insecticides/pesticides used for the control of external parasites on animals.

All of the above-mentioned commodities must therefore be subject to import controls. This ensures that only healthy animals, and safe animal products and good quality and safe livestock production inputs and veterinary support materials are imported into Bangladesh.

Border control of commodities subject to import and export control is implemented at designated Border Inspection Posts along the land borders of Bangladesh and at air and seaports in order to protect human and animal health and the environment from risks associated with the introduction, establishment and spread of infectious agents, toxins or other harmful substances.

The Department of Livestock Services (DLS) plays an important role in and holds the legal mandate for controlling the import and export of live animals, animal products and animal feeds through the issuance of **Import permits** for the importation of commodities and **International Health Certificates** for export purposes. In addition, the DLS has the authority and the role of undertaking border inspection and quarantine of any controlled commodities entering, transiting through or being exported from Bangladesh through any designated port of entry.

The “Import Control Authority” within the National Board of Revenue of the Ministry of Finance (MoF), also has authority for the control of import and export of all “goods” into and out of Bangladesh under the Import and Export Control Act (1950).

The DLS also collaborates with the Directorate General Drug Administration (DGDA) within the Ministry of Health and Family Welfare, in providing a No Objection Certificate (NOC) in relation to any imported veterinary medicine or biologics, laboratory reagents and test kits.

## **INTERNATIONAL STANDARDS RELATING TO THE TRADE OF ANIMALS AND ANIMAL PRODUCTS**

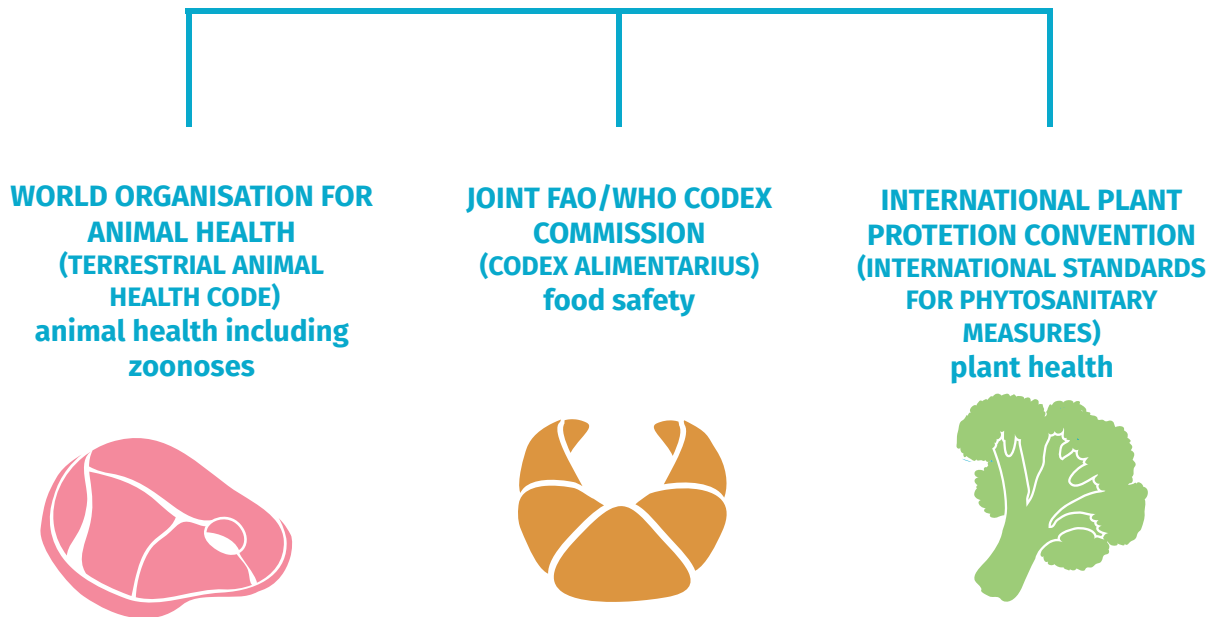
### **1. International standards and standard setting bodies**

The principles to be adopted by Member countries of the World Trade Organisation (WTO) in relation to the international trade of animals, animal products and plant materials are embodied within the Sanitary and Phytosanitary (SPS) Agreement of the WTO. Under this agreement three “sister” organisations have been mandated to set standards which act as guidelines to help Member Countries protect themselves against risks associated with the importation of these commodities. The three sisters and their respective guideline texts are:



- The World Organisation for Animal Health (WOAH, formerly OIE) and the Terrestrial and Aquatic Animal Health Codes;
- the joint Food and Agriculture Organisation / World Health Organisation (FAO/WHO) Codex Alimentarius Commission responsible for the administration of the Codex Alimentarius and;
- the FAO International Plant Protection Commission which administers the International Standards for Phytosanitary Measures.

## World Trade Organisation SPS Agreement on Sanitary and Phytosanitary Measures



The SPS Agreement takes into account a combination of factors to ensure that the application of sanitary measures for importation of commodities is least trade restrictive, but at the same time allows a Member Country to ensure an acceptable level of protection (ALOP) against the risks associated with importation of such commodities.

Because of differences between countries in their animal health situations and the capacity of their Veterinary Authorities, various options are offered by the Terrestrial and Aquatic Animal Health Codes. When defining the sanitary measures to be complied with by an exporting country the importing country should consider the animal health situation in the exporting country, in any transit country(ies) and in the importing country before determining the precise sanitary requirements for trade. To maximise harmonisation of the sanitary aspects of international trade, Veterinary Authorities of Member Countries should base their import requirements on WOAH / Codex standards. These sanitary requirements should be defined in an **Import Permit**, issued to a (licenced) importer by the Veterinary Authority (VA) of the importing country. Any commodity which is subject to export should then be inspected and samples taken and tested if necessary, before being certified as having complied with the defined sanitary requirements on the Import Permit, on an **International Health Certificate** issued by the VA of the exporting country, immediately prior to the export of the commodity. Model Import permits / and

International Health Certificates for export recommended by the WOAHA are included in Chapters 5.10. to 5.12 of the TAHC. (Samples of an Application Form, Guidelines for completion and an Import permit are given in Annexes 3a, 3b and 4).

Import permits should be exact and concise and should clearly convey the sanitary requirements of the importing country to satisfy their ALOP. In some instances, it may be necessary for prior consultation to take place between the Veterinary Authorities of importing and exporting countries to enable agreement on the exact sanitary requirements such that the signing veterinarian can be given guidance on the understanding between the Veterinary Authorities involved. Such interaction can allow the principle of equivalence of sanitary measures to be applied as well as agreeing on bilateral trade agreements. The certification requirements should not include conditions for diseases that are not transmitted by the commodity concerned. The importing country may not include sanitary measures to be taken against a disease which is endemic in its own territory unless such disease is the subject of an official national control programme. The certificate should be signed in accordance with Chapter 5.2 of the TAHC.

In the event that an importing country wishes to impose a standard which differs from and is stricter than the standard set by one or other of the standard setting bodies in relation to a particular disease / pathogen and a particular commodity then such measures must be based on a **Risk Analysis** using the risk analysis / risk assessment techniques as developed by international organisations (WOAH/Codex).

## 2. One-Stop Border Control

At present, Border control procedures of most exporting and importing countries in developing or emerging economies are carried out separately by the respective Competent Authorities on either side of the two borders.

The World Customs Organization (WCO), the World Bank and other UN agencies are now joining hands in promoting coordinated border management with the aim of reducing the costs of moving goods across borders. From an international coordinated border management perspective, one stop border posts have been introduced or are being considered as a mechanism to improve the movement of goods across shared borders. Such arrangements are being made through the use of web-based procedures for issuance of Import Permits and International Health Certificates (for export certification), such that access to each document is open to inspectors on either side of an international boundary. Such a procedure allows for goods to be cleared more quickly and more efficiently than was the case previously. Such arrangements reduce transit times for traders and transporters, they lead to an effective use of available resources and assets at a lower cost, as well as improved competitiveness of goods due to reduced processing times. The arrangements thus have both economic and enforcement benefits. However, they need to be rooted in a sound policy and be underpinned by an enabling legal framework and implementation strategy that have the support of all stakeholders.

## 3. Import protocols – Live animals and animal products

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1 <https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access/>

The protocols described below follow the principles embodied in the guidelines provided by the WTO and the WOA, as described above. Standards or conditions which define each element of the protocol should be set in the Rules as yet to be promulgated under the Animal and Animal Product Quarantine Act (2005).

### **3.1 Importers - Licencing**

Legislation should require that a person wishing to become an importer (of animals / animal products), whether a natural or juristic person (registered company) should hold a licence issued by a licencing authority, subject to compliance with certain defined conditions. In the case of an importer of perishable food products of animal origin, such conditions would include, amongst others, the requirement to have refrigerated vehicles available for transportation of the goods to be imported to and from storage premises, as well as sufficient cold storage facilities, each with temperature recording devices for maintaining accurate records of transportation and storage temperatures at all times. The licencing authority, in this case, should (ideally) be the Veterinary Authority (VA), also responsible for issuance of Import permits and Export Health Certificates, since some of the conditions of licencing are of a technical nature and require a science-based understanding of food safety requirements. If the Competent Authority responsible for licencing is not the VA then a provision should be placed in the legislation ensuring that licencing would be based upon, amongst other conditions, that the applicant holds a Certificate of Technical Conformity, issued by the VA.

The issuance of such a Certificate would be subject to a visual inspection and confirmation of compliance with all technical conditions of licencing as prescribed in Rules.

### **3.2 Veterinary Authority / other Competent Authority (importing country) – Licencing of Importers**

Subject to being compliant with licencing conditions, the Veterinary Authority (or other Competent Authority (CA)) should consider an application for licencing to operate as an importer of live animals and / or animal products and respond with issuance of an Import Permit within a defined period of time, subject to all conditions being met and payment of a prescribed fee. The VA / other CA may refuse an application giving the reason for rejection of the application and the necessary corrective measures to be taken by the applicant to reach compliance.

### **3.3 Licenced Importer - Application for a permit to import a live animal or an animal product**

A provision in the Rules should then oblige a licenced importer to apply for a permit to import each new consignment of a restricted commodity (live animal or animal product). Once again, such application should be made on a prescribed Form. Guidelines should be provided to ensure that all required information is placed on the Form. Once a degree of trust is built between an importer and the VA, the VA can consider issuing an Import permit for multiple consignments of the same commodity, for a specified period of time. (Sample Application Form,

Guidelines for completion of Application Form and an Import permit template following WOAH guidelines are provided in Annexes 3a , 3b and 4).

### **3.4 Veterinary Authority - Issuance of Permit to import a Live animal or animal product**

Under the guidelines provided in the WTO SPS Agreement, the WOAH Terrestrial Animal Health Code (TAHC) and the FAO/WHO Codex Alimentarius, it is the right of the Veterinary Authority of an importing country to visit and evaluate the quality of the veterinary services of an exporting country. Such an evaluation is undertaken in order for an importing country to have confidence in the ability of the VA of the exporting country to certify the health and safety of live animal or animal products accurately.

Prior to issuance of an import permit the VA of the importing country may therefore undertake a trade mission to an exporting country in order to inspect and evaluate the quality of the veterinary services. In all cases, the VA of an importing country shall base its sanitary requirements for import on the basis of establishing an “appropriate level of protection” (ALOP) but at the same time following the standards and guidelines provided in the SPS Agreement TAHC / Codex Alimentarius and avoiding unnecessary barriers to trade.

### **3.5 Sanitary measures – Import of live animals and animal products**

A Risk Analysis Team shall be established within the Directorate of International and Domestic Trade and including personnel trained to undertake risk analysis within the Epidemiology Unit. The Risk analysis Team shall define the sanitary requirements to be met in respect of a live animal or an animal product to be imported, taking into consideration the Articles of the SPS Agreement and, in addition, the standards defined in Volume II of the Terrestrial Animal Health Code and/or the Codex Alimentarius, as appropriate. In the event that the TAHC standards are found to be sufficient and satisfy the ALOP then no formal risk analysis exercise is required. If, however, the Risk Analysis Team consider that there is a need to impose a standard which is stricter than any of the TAHC standards then a Risk Analysis shall be undertaken in accordance with the procedures defined in the TAHC for live animals or the Codex Alimentarius, for animal products.

The selected sanitary requirements are listed under two Sections of the Import Permit – General Conditions (Transportation requirements etc. / Accompanying Documents / Declaration of freedom from clinical evidence of disease or injury); and Special Conditions: Freedom from evidence of prior infection with defined animal pathogens, [serological evidence], vaccinations required, quarantine period prior to shipment, etc.) on Page 2 of the Import Permit (see Annex 4 for examples of General Conditions)

### **3.6 Import control procedures – Border Control – Inspection, Sampling, testing, quarantine**

An importer of an animal product shall inform the local (District) DLS officer in charge of border control regulation of the expected arrival of a consignment of a live animal or animal product at a designated port of entry, not less than 15 days prior to arrival. However, once all Import permits are issued electronically, the importing officer can be informed of the issuance and thus imminent arrival of goods through a web-based automated notification.

Upon arrival of a consignment of a live animal or an animal product, the Customs Border Control Authority at the Border Inspection Post (BIP) should immediately place the vehicle in the Controlled Customs Area of the BIP and refer the consignment to the DLS authorised officer for inspection and clearance BEFORE any other border controls are attempted.

The authorised officer shall undertake an inspection of the accompanying documents of the consignment presented by the importer. In particular it is important to confirm that the International Health Certificate prepared by the Veterinary Authority of the exporting country addresses all of the sanitary requirements stipulated on the Import permit. Other documents to be checked are the Bill of Lading and Certificate of Country of Origin.

Following document inspection, the authorised officer shall then conduct a physical inspection of the consignment, in the presence of a Customs official, since the physical inspection of the goods shall involve the breaking of a Customs seal on the container. The Customs official shall be responsible for replacement of the seal once the physical inspection has been completed. Such a physical inspection should confirm that the consignment is exactly as described on the Import permit in terms of product description according to the HS Code, quantity, packaging details and adherence with cold chain requirements (Thermolog recording) in the case of perishable goods.

Assuming the document inspection and physical inspection reveal no issues of non-compliance with prescribed standards, the authorised officer shall issue the importer with a Certificate of Sanitary Release, allowing the consignment to enter Bangladesh, subject to completion of other port authority requirements.

In the event of suspicion of any documentation or that the cold chain has not been maintained in accordance with the instructions of the producer / manufacturer of the goods, or that the consignment differs in some way from that described on the Import permit, then it may be considered necessary to take samples of the consignment for laboratory testing.

In such cases, the consignment shall be detained in quarantine. It is important that BIPs are equipped with cold storage facilities in order to detain perishable goods, pending the laboratory confirmation of compliance with sanitary requirements and issuance of a Certificate of Sanitary Release. Similarly, arrangements shall be made for the quarantine of animals, at or near the BIP, or at a designated place where secure facilities are available for the isolation of any live animals pending the issuance of a Certificate of Sanitary Release.

Sampling and testing of such “official” samples from animal products destined for human consumption or from a live animal shall be taken and tested in accordance with Codex guidelines. Samples taken from live animals for laboratory testing should be tested in accordance with the latest version of the WOAHP Manual of Diagnostic Tests and Vaccines.

In the event that a consignment is found to be non-compliant with specified sanitary

requirements the authorised officer shall take one of the following actions, depending on the circumstances:

- inform the importer in writing that the consignment is not compliant, providing evidence of non-compliance (Laboratory report).
- Offer to extend period of quarantine in order to allow the importer to correct any discrepancy in accompanying documentation.
- Request the importer to return the consignment to the exporting country, or, if not possible, to seize, destroy and dispose of the consignment in accordance with prescribed procedures (Rules), or
- Offer the importer the opportunity to subject the consignment to a process which alters its status in terms of its physical characteristics and authorises the importer to use the consignment for another use which does not present a risk to human or animal health or life or any risk to the environment.

## **4. Export protocols**

### **4.1 Request for Import permit**

A person wishing to export a live animal or an animal product shall collaborate with the importer in the importing country to apply for an Import permit from the Veterinary Authority of the importing country.

### **4.2 Inspection and Certification for Export**

Upon issuance of an Import Permit from the importing country, the exporter shall apply to the DLS Department of International Trade for an inspection of the consignment and issuance of an International Health Certificate which certifies that all of the sanitary requirements specified on the Import permit have been met.

### **4.3 Export Certification procedures**

The authorised officer responsible for export certification shall arrange for an inspection of the live animal or the animal product at the premises of origin / processing. The authorised officer shall ensure that a consignment is able to meet all of the general and sanitary requirements as specified on the Import permit issued by the VA of the exporting country. The officer shall arrange for quarantine of animals and any vaccinations or serological tests to be undertaken within the prescribed periods. The authorised officer shall only sign the International Health Certificate when he can personally verify that all measures for compliance have been taken. He should be in possession of copies or the original certificates issued by other members of the DLS, for each sanitary requirement, as appropriate.

Assuming that all sanitary requirements of the importing country have been met, the authorised officer (Export) shall issue the exporter with an International Health Certificate.

Once the “One-Stop Border Control” system has been established, the International Health Certificate shall be issued online, such that the VA of the importing country can link the Certificate to the issuance of the Import permit for that consignment and all documentary checks can then be carried out before the consignment reaches the border of the importing country.

## **LEGISLATIVE FRAMEWORK – IMPORT / EXPORT OF ANIMALS, ANIMAL PRODUCTS AND VETERINARY SUPPORT MATERIALS**

### **1. Animals, animal products and Animal feeds**

The Department of Livestock Services (DLS), under the Ministry of Fisheries and Livestock has been given the authority for the regulation of the import and export of animals and animal products, which, by definition, includes animal genetic materials, under the **Animal and Animal Product Quarantine Act, 2005**. Section 24 (A) of this Act authorises the Government to determine the terms and conditions for import or export of animals or animal products through the promulgation of rules, however, no rules have yet been made. Section 3 of this Act makes a very broad provision which requires the DLS to adhere to the following condition: *“Quarantine and restricted or otherwise control or impose limitation etc may be done in any way for the import and export of animal and animal products by the government from time to time under the **Imports and Exports (Control) Act, 1950** (XXXIX of 1950) that may cause diseases to animal or human body.”* The inexact wording used here is almost certainly due to poor English translation from the original Bangla version, nevertheless, the arrangements described as follows are extremely complex and to some extent cumbersome.

The Imports and Exports (Control) Act, 1950 and Import Policy Orders are administered by the Import Control Authority within the National Board of Revenue of the Ministry of Finance (MoF), however, the Customs Act (1969) and the Import and Exports Control Act 1950 and Import Policy Orders are promulgated and Gazetted by the Ministry of Commerce (MoC).

Section 3 (1) of the Imports and Exports (Control) Act, 1950 refers to authority of the Government to publish an order in the Gazette which, subject to conditions specified in such order, may restrict, prohibit or control the import and export of specified goods, etc. The MoC has promulgated a series of Import Policy Orders under the above authority, the most recent version of which is the **Import Policy Order, (2021-2024)**. This version of the Order differs from previous versions in so far as it now requires that any person wishing to import any beef, mutton or poultry meat or any other type of meat edible to humans, must first obtain “permission” from the DLS prior to the importation of such goods. It is unclear whether this “permission” amounts to the requirement to obtain an Import Permit, since sub-section (2) under Section 3 of the

Imports and Exports (Control) Act requires that any imports of specified goods shall be subject to the issuance of a licence by the Chief Controller of Customs (of the Import Control Authority), along with other required documentation.

Paragraph 16 of the most recent English version of the Import Policy Order (2012 -2015) makes specific provisions for the regulation of the import of fresh and processed milk, milk products and any other food items, all of which are required to be accompanied by a test certificate for radioactivity for Cs 137. Furthermore, all milk and milk products shall be certified as being free from *“added melamine, and that the cows from which such milk / milk product is derived have not been treated with estrogenic hormones nor any hormone growth promotants.”* All food products shall be accompanied by a certificate issued by the relevant competent authority of the exporting country certifying that the food is *“fit for human consumption”, “that it does not contain harmful ingredients”,* or that *“it is free from all kinds of harmful germs.”* Such a certificate shall mention the age group for which the item is eligible for consumption.

In addition, sub-paragraph 25 states: *“all foodstuff/edible substances imported into Bangladesh must undergo mandatory tests of the Bangladesh Standards Testing Institute (BSTI) and the Bangladesh Centre for Science and Industrial Research (BCSIR). On arrival of the consignment in Bangladesh the importers shall submit samples of the items to the BSTI/BCSIR for testing and obtain clearance certificate from them.*

Paragraph 17 of the same, earlier English version of the Import Policy Order, regulates the import of fish feed and animal feeds. Sub-paragraph (1) prohibits the import of fish feed and animal feed except unless accompanied by a radioactivity test report for Cs 137 and a certificate to the effect that the feed product is fit for consumption by fish, poultry or animals.

Sub-paragraph (2) (a) prohibits the import of fish feed that contains *“harmful medicines, hormone and steroid including chloromphenicol and Nitrofurantoin”;* and Sub-paragraph 2 (b) states *“In case of import of poultry feed and animal feed ingredients are to be inscribed on its packet and a certificate issued by competent authority of the exporting country to the effect that such feed items are free from chloromphenicol, Nitrofurantoin and Melamine is to be submitted.”*

The import of live poultry is further regulated under Paragraph 17 of the Import Policy Order.

As mentioned above, Chapter 5 of the Terrestrial Animal Health Code provides guidelines for Member Countries concerning the responsibility of an importing country to specify the import sanitary requirements to be included in the International Health Certificate, such sanitary requirements should be specified on an Import permit.

The existing legislation in force would seem to give the authority for the issuance of an “import licence” to the Import Control Authority, (MoF) rather than to the DLS, although the importer is required to seek “permission” from the DLS before applying for an import license. Furthermore, the Import Policy Orders specify some sanitary requirements to be met in relation to the import of live poultry and fish and animal feeds. However, the sanitary measures specified by this Order are by no means complete. Such sanitary measures which apply to all such commodities, regardless of country of origin, should actually be specified within the Rules made under the Animal and Animal Product Quarantine Act and not under legislation administered by the Import Control Authority / National Revenue Board. Furthermore, the Rules to be made under the Animal and Animal Quarantine Act should provide the Form for application for an Import permit



as well as guidelines on how to complete such a Form.

Furthermore, provisions under Sections 4-7 of the Fish Feed and Animal Feed Act (2010) prohibit the importation of an animal feed by any person unless licensed by the licencing authority of the DLS. Thus, there is duplication of mandates established in the principal legislation administered by the MoFL and the MoC.

It is recommended that the DLS shall engage in discussion with the MoC and the MoF in order to seek clarification and to streamline the procedures for importers of live animals, animal products and animal feeds. Under ideal circumstances the DLS should be recognised as the Competent Authority with responsibility for specifying the sanitary requirements for importation of live animals and animal products as well as animal feeds, and as such should also be authorised to issue Import permits which specify the sanitary requirements to be issued to an importer of such commodities. Any imported goods subject to an Import permit should then be accompanied by an International Health Certificate issued by the Veterinary Authority of the exporting country. The TAHC and the SPS Agreement provide guidelines for the negotiation of an “equivalence” agreement between the Veterinary authorities of importing and exporting countries in order to avoid the imposition of unnecessarily costly measures. At the time of entry of any goods subject to an importation permit, an authorised officer of the DLS should have the authority to inspect the consignment documentation and, subject to finding that the consignment is fully compliant with the requirements as specified on the Import permit and as certified on the International Health Certificate, to issue a Sanitary Notice of Clearance, to be passed to the Customs Authorities who may then allow the consignment to enter the territory of Bangladesh, subject to payment of import duties.

In spite of the legislative anomalies described above, it is understood that the Deputy Director of the Human Resources Department under the Director of Administration within the DLS is responsible for the issuance of Import permits for animals and animal products. The permits being used are in full compliance with the WOH standards set out in Chapter 5.10 of the TAHC. Such permits are available online and may be viewed by authorised Quarantine officers who are responsible for document checks and inspection of consignments of live animals, animal products and animal feeds at designated points of entry.

In the case of animal feeds, again, in addition to the provisions in the legislation administered by the MoF as described above, an Animal Feed Control Authority, established within the DLS under the authority of Section 3 (2) of the [Fish Feed and Animal Feed Act \(2010\)](#), has the authority to regulate the importation of animal feeds. Section 6 of this Act states that the importation of fish and animal feeds by any person is prohibited unless such person is licensed by the Licencing Authorities of the Departments of Fisheries or Department of Livestock Services, respectively. However, as for live animals and animal products, there is no mention of the need for an importer to obtain an import permit for the importation of any consignment of fish or animal feed. On the contrary, an importer is required to obtain an import licence from the Import Control Authority of the MoF.

The implementation and enforcement of the Fish Feed and Animal Feed Act is supported by the [Animal Feed Rules \(2013\)](#). In addition, and to some extent overlapping with the authority provided to the Animal Feed Control Authority, the provisions of Paragraph 17 of the Import Policy Order, Sub-paragraphs (4) and (5) restrict the importation of meat and bone meal, which shall be subject to prior permission issued by the Department of Livestock. Such meat and

bone meal should be certified as being free from Bovine Spongiform Encephalopathy and Transmissible Spongiform Encephalopathy as well as Anthrax and Tb. In addition, such goods “shall be free from:

- (a) *harmful chloromphenicol & Nitrofurantoin including Antibiotic;*
- (b) *The imported goods are free from by-product of swine;*
- (c) *The imported goods are free from Melamine.”*

Sub-paragraphs(6) and (7) limit the importation of vaccines and diagnostic reagents and live poultry, as follows:

*“(6) Registered Vaccines and diagnostic reagent used in fish and poultry industry will be importable subject to permission issued by the Directorate of Fisheries and Livestock.*

*(7) In case of import of poultry and birds, a certificate to the effect that those are free from Avian Influenza issued by the appropriate authority of the exporting countries shall have to be submitted to the Customs Authority.”*

Similar restrictions to the above are made for the importation of beef, mutton or chicken meat and protein concentrate derived from meat and bone meal.

Whilst the sanitary measures prescribed by the Import Policy Order are partially useful, they are incomplete in so far as they do not cover all of the risks of introduction of animal diseases or all types of harmful contaminants which might be associated with such commodities. As mentioned above in relation to the control of import of animals and animal products, such sanitary measures would normally be defined by the Competent Authority responsible for regulation animal health and welfare and the importation and export of animals, animal products and animal feeds, in the case of Bangladesh, the DLS.

As above, it is recommended that the DLS, the MoC and the MoF review their respective pieces of legislation with a view to eventual harmonisation. Acting as the Competent Authority for the regulation of animal health and welfare as well as the safety and quality of animal products, it is recommended that the DLS becomes responsible for defining what sanitary measures shall be applied for the importation of all such commodities, rather than the MoC. All sanitary requirements for importation of live animals, animal products and animal feeds should be notified to the WTO SPS Committee.

## **2. The Regulation of Importation of Veterinary Medicines and Vaccines**

The authority for the regulation of the importation, registration, sale and use of Veterinary Medicines and Biologics is held by the Directorate General of Drug Administration (DGDA, provided under the **Drugs Act (1940)**, the **Drug Control Ordinance (1982)**, the **Drug Rules (1945 and 1946)** and the **National Drug Policy (NDP) (2005)**. It should be noted that within this legislation there is no definition of “veterinary medicine” or “veterinarian”, furthermore, there is no essential list of veterinary medicines provided in any Schedule to the Acts or in any Rules.

The National Drug Policy (2016) provides a comprehensive framework for modernisation of the pharmaceutical industry and regulatory authorities in Bangladesh, bringing all practices related to manufacture, storage, distribution, sale and use of drugs (including veterinary medicines and vaccines) in line with the international standards of WHO and the Codex Commission.

Amongst the Objectives and main elements of the NDP are the following, to quote:

*“2.1 To ensure people can have easy access to safe, effective and good quality drugs at affordable prices.*

*2.2 To ensure rational and safe use of drugs and proper dispensing.*

*3.14 To prohibit sales and distribution of drugs without prescription from registered physician to ensure rational use of drugs.*

*3.15 Publish list of Over-the-Counter (OTC) drugs for general use aligning with the systems of developed countries. In case of veterinary drugs, a list of Over the Counter (OTC) drugs will be prepared and published on the basis of the opinion of experts of veterinary specialists.*

*An updated law will be formulated in Bangla version merging the 'Drug Act 1940' and the 'Drug (control) Ordinance 1982' in view of updating existing laws furthermore. Necessary rules will be made as soon as possible to execute the aforementioned laws.*

*4.26 Drugs used in treatment of livestock and fish*

*a. Appropriate quality control measures as per GMP guideline will be undertaken to manufacture drugs used for treatment of livestock.*

*b. Indications of use have to be specified on the label, literature, and packaging of drugs used in the treatment of livestock and fish and drugs that are used in livestock will be discouraged from being used in fish.”*

In spite of the above Policy statements, no explicit consideration has been given to the regulation of the use of veterinary medicines in food producing animals. In particular, the inappropriate (prophylactic) use of anti-microbials as growth promotants and the (proposed) formulation of regulations governing the application of withdrawal periods for all veterinary medicines and pesticides is missing from this Policy document. Furthermore, as yet, there are no Rules promulgated under the existing legislation administered by the DGDA to ensure the appropriate use of veterinary medicines, biologics and pesticides used on food producing animals.

In spite of the above, Section 14 (1) of the Fish Feed and Animal Feed Act prohibits the inclusion of antibiotics, growth hormones, steroids and other harmful chemicals including pesticides in animal feeds.

On request, the DLS nominates one veterinarian to attend the meetings of drug committee of the DGDA who is authorized to give advice to the Drug Import Committee of the DGDA as and when an application to import a veterinary medicine is lodged by an importer. It is reported that there is a good collaborative working relationship between the DLS and the DGDA but with only

one DLS representative on the committee, veterinary decisions can be overruled.

The DGDA is reported to have been active in enforcing some of its regulations and has confiscated illegally imported human medicines and fined owners/operators of pharmacies found selling or importing human medicines which have not been registered with the Drug Administration. However, as yet there have been no seizures or fines imposed for the illegal importation or sale of non-registered veterinary medicines or biologics.

**Pesticides** are regulated by the Department of Agricultural Extension (DAE), within the Ministry of Agriculture, under a mandate provided in the **Pesticide Rules 1985**, in addition to the legislation administered by the Ministry of Environment (MoE).

Coordination needs to be improved especially between DLS, DAE and DGDA as the primary output is Regulation and Guidance on the control and prevention of malpractices or misuse of pesticides.

### 3. Regulation of the importation of Veterinary diagnostic resources

Clause 6 of **Import Policy Order 2021-2024** states: (6)“Registered Vaccines and diagnostic reagent used in fish and poultry industry will be importable subject to permission issued by the Directorate of Fisheries and Livestock.

(7) *In case of import of poultry and birds, a certificate to the effect that those are free from Avian Influenza issued by the appropriate authority of the exporting countries shall have to be submitted to the Customs Authority.”*

The authority for the regulation of the importation of veterinary diagnostic resources including reagents and chemicals rests with the Bangladesh Standards and Testing Institute (BSTI), within the Ministry of Industries. Section 3 9a) ii of the **Drugs Act 1940** defines drug as including the word “diagnostic”, although it does not specify whether this means diagnostic reagents. It is thus unclear whether or not there is an overlap between the provisions of Bangladesh Standards and Testing Institution Act, 2003 and those of the Drugs Act. It is therefore recommended that the respective Competent Authorities, DLS, DGDA and BSTI join hands and review the existing legislation. If it seems appropriate, the legislation may be revised in such a way that there is greater clarity and that the DLS has a formally defined role in the process of deciding which diagnostic reagents and test kits are required for importation for the livestock sector and to be approved for use in Bangladesh.

## **BORDER CONTROL REGULATORY ACTIVITIES OF ANIMAL AND ANIMAL PRODUCTS & QUARANTINE BEING PERFORMED BY DLS**

Given the importance and scale of the livestock industry in Bangladesh, the current organisational structure for the management of international and domestic trade of live animals and animal products, as well as other important inputs that can affect food safety of animal products within the DLS is unsatisfactory. At present, the Deputy Director of Human Resources, reporting to the Director of Administration, is responsible for the issuance of Import Permits and International Health Certificates. There are no other dedicated staff at the DLS headquarters or at the Divisional level of the administration with responsibility for supervision or oversight of the enforcement of trade related regulations. At the District and Upazila levels, District Livestock Officer/Upazila Livestock Officer/Veterinary Surgeons and / or Livestock Assistants have been given “additional duties” to cover some of the regulatory functions related to border control, including physical inspection and confirmation of compliance with sanitary requirements of incoming consignments, defined on Import Permits, but most of this cadre have not been provided with training and thus are unable to perform their duties in accordance with WOA standards as set out in Section 5 of the TAHC.

There are currently 24 Quarantine stations established at the air, land and seaports of Hazrat Shah International Airport (Dhaka), Benapole Land port, Jessore and Chittagong Sea Ports and at 21 border inspection points. The three main ports of entry have a staffing establishment of 9 persons each, of whom 3 are professional and the remaining six are administrative staff, cleaners / security guards. A similar establishment has been defined by the DLS for the remaining 21 Quarantine stations placed at designated ports of entry having fewer (06) staff.

The staffing levels defined in the current organogram of the DLS are not that insufficient for purpose, however, it is necessary to fill all vacant posts with staff with the appropriate level of education and training. It is recommended to provide a full level of staffing, as proposed in the most recent staffing level organogram of the DLS at the three major border inspection posts (Hazrat Shah Jalal International Airport, Benapole Land port, Jessore and Chittagong Sea Ports). These three ports may be headed by one district level officer and supported by two entry level veterinarians instead of one pathologist. For the “pathologist” designated to work in the animal quarantine station, in-depth knowledge of pathology is not absolutely necessary, instead s/he could be trained to perform all of the necessary border control inspections / sampling and testing using rapid test kits and manage the quarantine procedures, if required. At all other border crossings, considering the current level of work load, the staffing level (allocated strength) seems to be sufficient, but needs to be trained to perform the border inspection / sampling duties.

At present, Hazrat Shah Jalal International Airport is the only port of entry quarantine station where the position of Veterinary pathologist (Quarantine officer) has been filled, along with 3 sub assistant livestock officers. At the Chattogram sea port, there are three sub assistant livestock officers posted for sample collection. At all other ports of entry, there are no dedicated Veterinary officers appointed, as yet. Instead, District/Upazilla Livestock Officers (DLO/ULos) are designated under the title of “additional duty” to perform border inspection functions as and when live animals, animal products or animal feeds are being imported through those ports of entry.

During the field visit undertaken by the UNIDO National Expert on Inspection it was found that the Veterinary pathologist at Hazrat Shah International Airport had a reasonable understanding of how to conduct an Import inspection. The officer has access to the internet and is able to view the Import permit issued to the importer and thus he is able to compare the certification

provided by the Veterinary Authority of the exporting country with the sanitary requirements specified on the Import permit. The UNIDO national expert was informed that the technical officers at Hazrat Shah International Airport take samples from imported day-old chicks to be tested for Avian Influenza and those at Chattogram Sea Port regularly take samples of imported animal feed in collaboration with Customs Officers for submission to the Chattogram Veterinary and Animal Sciences University (CVASU) for testing for the presence of antimicrobials, as defined in the Import Policy Order.

The DLS has now established a Quality Control (QC) Laboratory equipped with state of the art instruments and equipment for analysis of all types of residues or contaminants which may be detected in food products of animal origin. However, as yet there is no formal residue monitoring programme in place. The QC laboratory lacks a sufficient number of trained personnel to utilise all of the available resources. Furthermore, the budget allocation is insufficient for the laboratory to purchase the required quantities of reagents to support a national residue monitoring plan. At present no samples from imported animal products are submitted to the QC lab – All samples are currently submitted to BSTI and BCSIR laboratories.

It was informed that none of the DLO/UOs at District/Upazila Livestock Offices had been provided with any training on how to carry out border inspection duties.

The responsibility for issuance of Import permits and International Health Certificates for export certification rests with the Deputy Director of Human Resources under the overall supervision of the Director of Administration within the DLS. Issuance of permits for import of all other high-risk commodities such as vaccines and other biologics is undertaken by the Deputy Director Animal Health. All such permits and Certificates are available online in accordance with the single window import / export procedures now being introduced at the main ports of entry.

It was found that records of import permits / international health certificates for export issued by the Deputy director HRD/Animal Health and quantities of commodities imported through the three main ports of entry were being maintained by the Deputy Director HRD. However, records of imported live animals or animal products and animal feeds entering through other ports of entry and any incidents of non-compliance with border control requirements were not available.

Given the enormous task of building capacity that the DLS workforce now requires, consideration may be given to transferring the responsibility for the management of international trade of animals, animal products and indeed other high-risk commodities to a unit or section specifically dedicated to this important area of the veterinary domain as has been recommended in the proposed revised organogram provided in the Report entitled A Draft Proposed Livestock Policy Framework and Food Safety Policy (UNIDO 2023).

Annex 1 of this Paper provides a list of the areas of enquiry made by the UNIDO National Expert on Inspection during his interviews with DLS personnel at the DLS headquarters and in the field. Annex 2 provides a summary of the responses to questionnaires completed by officers responsible for Import / Export controls.

# RECOMMENDATIONS

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## 1. Structure and Organisation of the DLS for Import / Export and Border Controls

- As has been recorded in the two papers prepared and submitted by UNIDO entitled “**Policy Planning for required Policy and Legal Reforms**” and “**Policy Paper on the Proposed Food Safety Legal Framework for Food of Animal Origin**”, it is recommended to undertake a thorough review of the current organogram and structure of the DLS. Such a review needs to take into consideration the roles, responsibilities and functions of a modern Veterinary Authority and the development of an organisational structure allowing the establishment of an effective chain of command between the headquarters, through each administrative level down to the Division, District, Upazila and field levels. This would allow for clearer definition of tasks and responsibilities allowing opportunities for strengthening collaboration along the chain.
- It is now acknowledged that the DLS has made an arrangement to establish an International Trade wing headed by a Director, International Trade who reports directly to the Director General. Administrative control of Animal Quarantine Stations may be included under the jurisdiction of this Director with new staff positions, instead of the Epidemiology Cell. The positions in the Epidemiology Cell may be renamed as Deputy Chief Epidemiologist/ Epidemiologist etc. to manage the affairs of the cell well.
- Within this Trade Directorate it is recommended to include the following sections to perform the listed functions:
  - **Domestic Trade**, responsible for Inspection of local markets, marketing regulation, certification, traceability and information of domestically produced animal products.

### IMPORT UNIT

- **International Trade Agreements Office with responsibility for management of:** Import Risk Analysis Team; Issuance of Import permits (animals/animal products); Equivalence / Bilateral trade agreements; Harmonisation of standards (global, regional).
- **Border Control of Animal and Animal Products & Quarantine Wing** – responsible for Management of BIPs, Border inspection & quarantine.
- **SPS Notification & Enquiry contact point** – responsible for engagement with WOH / WTO / Codex Commission - animal health status notifications, sanitary requirements – import of animals & animal products, including a Codex Commission Unit to engage with Codex Commission for standard setting procedures.
- **Director, International Trade** may be designated as the National Animal Quarantine Authority (which needs legal support also)

## EXPORT UNIT

**International Certification Unit**, responsible for: Inspection and sampling of export commodities, Issuance of Export permits, Issuance of International Veterinary Certificates.;/Staffing levels for each section or unit should be commensurate with planned levels of activity / workload. Similarly, induction training should be based on gaps between existing and required knowledge and skills to perform functions defined in the Job Description.

## 2. Review and revision of legislation

The DLS is mandated to control the import and export of live animals, animal products and animal feeds under the authority of the Animal and Animal Products Quarantine Act (2008) and the Fish and Animal Feed Act (2010) and Animal Feed Rules (2021). However, similar authority to regulate import and export of specified goods has been given to the Import Customs Authority of the National Revenue Board within the MoF. The legislation providing such authority, the Import and Exports (Control) Act (1950) and the Import Policy Orders (latest version - 2021-2024) have been promulgated by the MoC.

The following recommendations are based upon the guidelines provided to Member Countries in the SPS Agreement and in particular Section 5 – Trade Measures, Import / Export Procedures and Veterinary Certification, of the Terrestrial Animal Health Code.

- It is recommended that the DLS enters into a process of dialogue with the MoF and the MoC in order to review and if possible, eventually revise the existing legislation such that the DLS is provided with the full authority to define the sanitary measures to be applied for the Importation of live animals, animal products and animal feeds in accordance with international standards. In accordance with WOH standards, it is the Veterinary Authority which should be responsible for defining the sanitary requirements for the importation of live animals and animal products and issuance of an Import Permit.
- Furthermore, it is recommended that the procedures to be adopted before and at the border as well as following entry into Bangladesh territory should be as recommended in Section 5 of the Terrestrial Animal Health Code and the Codex Alimentarius, for importation of live animals and animal products destined for human consumption, respectively.
- In particular, it is recommended that a Risk Analysis Team is established within the proposed Department of International and Domestic Trade with responsibility for processing applications for import of live animals and animal products and issuance of Import Permits with sanitary requirements based on an ALOP developed in consideration of the animal health status of Bangladesh and the exporting country and, when required, a risk analysis conducted in accordance with international standards.
- Upon resolution of the anomalies found in the primary legislation it is recommended that the DLS prepares Rules to be made under the Animal and Animal Products Quarantine Act, firstly to specify general requirements for importation of animals and animal products and secondly to define border control procedures in accordance with the international standards of the SPS Agreement, the TAHC and the Codex Alimentarius and as provided under Section 3.3 of this Report.



- It is recommended that the DLS shall engage with the DGDA in order to establish a Veterinary Medicines and Biologics Division (Committee) within the DGDA.
- Such a Division should be comprised of at least 3-4 veterinary experts from within the DLS and veterinary academia and the Bangladesh Veterinary Council with specialised knowledge of veterinary pharmacology, vaccinology and clinical medicine.
- In addition, it is recommended that such a Technical Division / Committee should have representation of stakeholders such as the Bangladesh Poultry Producers Association and the Bangladesh Dairy Producers Association, as non-voting members, but who can provide valuable inputs especially relevant for compliance with defined standards or conditions to be made in Rules.
- It is recommended that the proposed Veterinary Medicines and Biologics Division should be authorised to make recommendations to the DGDA concerning the approval of applications for the registration of veterinary medicines and biologics, and rules relating to the manufacture, importation, export, distribution, sale and use of veterinary medicines and biologics. Such recommendations should be approved by the DGDA before being promulgated under the Drugs Act (1940), the Drug Control Ordinance (1982), the Drug Rules (1945 and 1946) and the National Drug Policy (2005), as appropriate.

### 3. Capacity building – Human resources and Infrastructures

- It is recommended that the DLS provides training to all officers involved in the control of Import and Export of live animals, animal products, animal feeds and veterinary medicines and biologics. Training should be needs-based and should be used to introduce and strengthen the capacity of regulatory officers to implement and enforce border regulatory controls in compliance with the standards found in the TAHC of WOH / SPS Agreement of WTO guidelines.
- » Senior Officers responsible for issuance of Import permits and Export Certification should be trained to:
  1. conduct Import Risk Analysis as described in Chapter 2.1 of the TAHC,
  2. perform the responsibilities of certifying officers and certification procedures as provided in Chapter 5 the TAHC.
  3. engage in reaching agreements on Equivalence in accordance with Article 4 of the SPS Agreement and Chapter 5.3 of the TAHC.
  4. understand the principles of Regionalisation, Zoning and Compartmentalisation as applied to sanitary requirements for import and export certification of live animals and animal products (Article 6 of the SPS agreement / Chapter 4.4 of the TAHC)
- \* Authorised Officers who conduct border control inspections should be trained on:
  1. the procedures to be applied to the import and export of animals before and at departure from an exporting country Chapter 5.4 TAHC;

2. Animal health measures applicable during transit from the place of departure in the exporting country to the place of arrival in the importing country – Chapter 5.5 TAHC
  3. Border posts and quarantine – Chapter 5.6 TAHC
  4. Animal health measures on Arrival - Chapter 5.7 TAHC
  5. Use of SoPs defining procedures for document checks, physical inspection and sample collection as applied to consignments of live animals and animal products.
- Consideration may be given to establishing Quality Control Laboratories in each of the 4 major cities throughout Bangladesh to avoid transportation of samples over long distances and to speed up testing of samples of consignments of goods subject to being placed under border quarantine prior to being issued with a Sanitary Certificate of Clearance
  - It is recommended to equip and supply laboratory facilities at Border Inspection Posts with appropriate instruments, test kits and other reagents for routine on-the spot testing of samples and to take samples, when necessary, for submission to the QC laboratory or other suitably equipped laboratory to undertake testing for microbial or chemical contaminants in food products of animal origin.
  - It is recommended that cold storage facilities be made available at all major designated ports of entry in order to facilitate storage / quarantine of goods pending importation or waiting to proceed for export.

## ANNEXURE 1

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### Questions to be answered for each Competent Authority relating to data collection

1. What data is collected ? Checklist of sources and types of data that could be available (above).
2. How is data recorded ? – Checklist: Paper / electronic / database Excel spreadsheet / Word Tables / monthly / six monthly / annual reports.
3. How and to whom is data reported ?
4. Where is the data stored ?
5. Do the persons responsible for keeping records carry out analysis of records ?
6. What information is available from food safety data analysis ?
7. Is food safety information being used for any purpose ?
8. Which CA's use information derived from food safety data ?
9. If so, what information and to what purpose is it put ?
10. Any information on prevalence of food-borne zoonotic diseases ?

Border control, quarantine, Issuance of import permits for live animals and animal products

- 1). Records / lists of general / specific sanitary measures to be applied for importation of defined commodities;
- 2). Records of quarantine of animals or animal products at border inspection;
- 3). Records of border control incidents and measures taken;
- 4). Database of import permits issued;
- 5). Quantities of animal or animal products imported to Bangladesh

Issuance of Export certificates for animals or animal products

- 1). Database of export certificates issued
- 2). Quantities of exported commodities
- 3). Records of Laboratory tests made for export certification of animals / animal products

## ANNEXURE 2

### Data recording of Border control of animals and animal products – Import permit / Export certification

| Regulatory function  | Responsible DLS Officers  |                                   |                                 |                  |                            |
|--|---|-----------------------------------|---------------------------------|------------------|----------------------------|
| 4.1 Border control, quarantine, Issuance of import permits for live animals and animal products                  | District Livestock Officer reporting to:<br>Deputy Director Human Resources Development/<br>Animal Health |                                   |                                 |                  |                            |
| Q1 Records / lists of general / specific sanitary measures to be applied for importation of defined commodities; |   |                                   |                                 |                  |                            |
| Q2 Records of quarantine of animals or animal products at border inspection;                                     |   |                                   |                                 |                  |                            |
| Q3 Records of border control incidents and measures taken;   |   |                                   |                                 |                  |                            |
| Q4 Database of import permits issued;  |   |                                   |                                 |                  |                            |
| Q5 Quantities of animal or animal products imported to Bangladesh  |   |                                   |                                 |                  |                            |
| Questions & Responses – District level   | Q-1   | Q-2                               | Q-3                             | Q-4              | Q-5                        |
| What data is collected?<br>Checklist of sources and types of data that could be available (above)                | Verified as per Authorized checklist  | List of export/ import items only | Unauthorized imports are seized | Issued by DD-HRD | As per prescribed proforma |
| How is data recorded? – Checklist: Paper, etc.   | Paper   | Monthly Report                    | Paper                           | Paper            | Paper                      |
| How and to whom is data reported?  | DG  | Director                          | DLO                             | DD (HRD)         | DD (HRD)                   |
| Where is the data stored?  | Quarantine Station  | DD (HRD)/ Animal Health           | No response                     | DD (HRD)         | DD (HRD)                   |
| Do the persons responsible for keeping records carry out any analysis of records?                                | Yes   | Yes                               |                                 | No               | No response                |
| What information is available from food safety data analysis?  | N/A   | No response                       | No response                     | N/A              | No response                |
| Is food safety information being used for any purpose?   | N/A   | No response                       | No response                     | N/A              | No response                |
| Which CA's use information derived from food safety data?  | N/A   | No response                       | No response                     | N/A              | No response                |
| If so, what information and to what purpose is it put ?  | N/A   | No response                       | No response                     | N/A              | No response                |
| Any information on prevalence of food-borne zoonotic diseases?   | N/A   | No response                       | No response                     | N/A              | No response                |

| Regulatory Function  | Responsible Officer of DLS  |
|--|---|
| 4.1 Issuance of Export certificates for animals or animal products | Deputy Director Human Resource Development, DLS/Animal Health – under Director Administration |

| Q1. Database of export certificates issued  |   |  |                                     |
|---|---|--|-------------------------------------|
| Q2. Quantities of exported commodities  |   |  |                                     |
| Q3. Records of Laboratory tests made for export certification of animals / animal products  |   |  |                                     |
| Questions / Responses   | Q-1   | Q-2  | Q-3                                 |
| 1. What data is collected? Checklist of sources and types of data that could be available (above)   | Health certificate / Vaccination / Date of Birth / Age / Sex etc. | 20-30 types of commodities<br>Around 800 M BDT per month | Salmonella/E. Coli/ Anthrax/ Fungus |
| 2. How is data recorded? – Checklist: Paper / electronic / database Excel spreadsheet / Word Tables / monthly / six monthly / annual reports. | Software  | Software   | Paper                               |
| 3. How and to whom is data reported?  | DG DLS  | DG DLS   | DG DLS                              |
| 4. Where is the data stored?  | DG DLS  | DG DLS   | DG DLS                              |
| 5. Do the persons responsible for keeping records carry out any analysis of records?  | No  | No   | No                                  |

# ANNEXURE 3A

## Application Form for an Import/ Transit Permit to Import or Convey in Transit a Live Animal or Hatching Eggs

TO BE COMPLETED IN **BLOCK CAPITALS** (SEE NOTES FOR GUIDANCE- Annex 2)

(a) **NAME OF APPLICANT**.....**DLS Licence /Registration Number**.....

(b) **PHYSICAL ADDRESS OF APPLICANT**.....  
2.1 **Mobile Number**:..... 2.2 **EMAIL**: .....

(c) **DESCRIPTION OF LIVE ANIMAL(S) OR HATCHING EGGS**

3.1 **SPECIES**..... 3.2 **BREED**..... 3.3 **TOTAL No**.....

3.4 **COUNTRY OF ORIGIN**.....

3.5 **ANIMAL IDENTIFICATION - 3.5.1 INDIVIDUAL IDENTIFICATION NUMBER**.....

3.5.2 **PASSPORT NO:** ..... 3.5.3 **GROUP IDENTIFICATION No.** .....

3.5.4 **INDIVIDUAL ANIMAL IDENTIFICATION – (Group of animals)** Please Complete FORM: VA/ANID/000/YY

3.6 **TYPE OF CONTAINER / CRATE / CAGE**..... 3.7 **NO OF UNITS**.....

3.8 **INTENDED USE:**  
Animal breeding  Slaughter  Research, Experimentation / Laboratory animal  Pet   
**TRANSIT**  Other please specify.....

3.9 **NAME OF PRODUCER /source**.....

3.10 **ADDRESS OF PRODUCER / AREA OF ORIGIN**.....  
(Zone or Compartment of origin, if applicable).....

4 **NAME & ADDRESS OF CONSIGNEE**.....  
..... 4.1 **COUNTRY OF FINAL DESTINATION**.....

4.2 **MOBILE PHONE No**..... **EMAIL**:.....

5 **MEANS OF TRANSPORT:** Road  Air  Sea

6 **INTENDED PORT OF ENTRY**..... 7. **INTENDED DATE OF IMPORT**<sup>11</sup>.....

8 **IN CASE OF APPLICATION TO CONVEY ANIMALS IN TRANSIT –**

8.1 **INTENDED PORT OF EXIT**..... 8.2 **INTENDED DATE OF EXIT:** .....

9 **DATE OF APPLICATION**.....

10 I certify that the information provided by me on this Form is true and correct

**SIGNATURE OF APPLICANT**.....

---

**For OFFICE USE** Date Received..... Approved  Rejected

Import Permit No. Issued..... Date of Issue (dd/mm/yyyy).....

Transit Permit No. Issued..... Date of Issue (dd/mm/yyyy).....

Name of Issuing Veterinary Inspector (Import/Export).....

DLS Border Control Office.....

**SIGNATURE**.....

# ANNEXURE 3B

## Guidelines and Notes for Completion of Application Form for Import / Transit Permit

### LIVE ANIMALS and HATCHING EGGS - (FORM: VA/IMP/TR/000/YY)

Application Form shall be completed LEGIBLY and in BLOCK CAPITAL LETTERS.

Each Number on this Guideline refers to the number of the Entry on the Application Form

- 1 Name of Applicant** - The application Form shall only be completed by the registered *owner* or person authorised by the *owner* and who has been registered to make an application on behalf of the owner, of a consignment of *animal* OR hatching eggs to be imported into Bangladesh. The owner should be the same person to whom the animal(s) or hatching eggs is/are destined – This person is usually the CONSIGNEE, except when the importer is supplying the animals or hatching eggs directly to another person. All IMPORTERS OF ANIMALS & HATCHING EGGS MUST BE LICENCED / REGISTERED WITH DVS AND HOLD A TRADING LICENCE WITH THE MoC
- 2 Physical Address of the Applicant:** The address should provide House No, Street No, District No.; Region No.; City or Town, Province Name. **Mobile phone and Email address**
- 3 Description of Live animal, OR Hatching eggs: -**
  - 3.1** Species: = e.g. (Cattle, Buffalo, Sheep or Goat. Poultry),
  - 3.2** Breed (e.g. Fresian, Mixed Zebu, Bengali, White Leghorn, Red Sussex, hybrid, etc, if known);
  - 3.3** Total Number of animals/hatching eggs. Please enter the exact number of animals or hatching eggs
  - 3.4** Country of Origin – For animals, this should be the same as the Exporting country. For Hatching eggs, it is the country where the animal products have been produced.
- 3.5 ANIMAL IDENTIFICATION**
  - 3.5.1 Individual Identification Number:** Please complete in the case of a single animal only - Some animals (mainly Dogs, cats and horses) are now identified with an Electronic chip which is implanted under the skin- If this is the case please give this Number and the approximate location of the chip (it is recorded on the Passport issued to the owner of the animal when the electronic chip is placed on the animal (see Passport notes - 3.5.2).
  - 3.5.2 Passport Number:** In the case of Dogs and Cats and Horses from Europe, US, Australia, Japan and some other countries, each individual animal has now been issued with a Passport which records the Electronic Chip Number (and location of insertion) as well as other details which help to identify that animal. All vaccination records for that animal should also refer to the same Animal Identification and Passport Number.
  - 3.5.3 Group Identification Number:** In certain instances, animals may be given a Group Identification Number but NOT Individual Numbers – (e.g. groups of small ruminants). In this case give the Group Number (each individual animal of that group should be identified with that number upon arrival at the port of entry.
  - 3.5.4 Animal Identification Numbers:** For groups of more than one animal - In the event that the DLS requires animals to be identified individually - Please provide Animal Identification Numbers and other details as specified on Form VA/ANID/0000/YY  
  
If no Animal Identification Number is required, then a group of more than one animal should be identified by other means, such as Species, Breed, Colour, Sex.

**3.6 Type of Container /Crate / Cage** – Please give a description of the type of Container or Unit in which animals/eggs are being transported: (e.g. 10 ton truck or trailer, Plastic cage containing 20 birds, or Cardboard carton containing 24 trays of eggs) If possible the international code should be used here – Please refer to: Recommendation No. 21 – Code of Passengers, Type of Cargo, Package and Packaging Materials of UN/CEFAT:

[http://www.unece.org/fileadmin/DAM/cefact/recommendations/rec21/rec21rev4\\_ecetrd309.pdf](http://www.unece.org/fileadmin/DAM/cefact/recommendations/rec21/rec21rev4_ecetrd309.pdf)

**3.7 No. of UNITS:** refers, in the case of consignments of Large animals (Cattle, buffalo, sheep/goats/horses), the number of trucks or trailers; For Poultry / Eggs the No. of crates, cages or Cartons.

**3.8 Intended Use:** Any of the following may be appropriate. Please select the most appropriate.

- a. Breeding/rearing: applies to animal for breeding or rearing and hatching eggs;
- b. Slaughter: applies to animal for slaughter;
- c. Research or Experimentation / Laboratory Animal – refers to animals used for laboratory purposes – requires a special permit to conduct research.
- d. Pet: applies to animals kept for companionship or enjoyment. This excludes livestock species;
- e. TRANSIT – in the case where importation is for conveyance of a consignment of animals, commodities or controlled articles to a third country
- f. Other: intended for purposes not listed elsewhere in this classification.

**3.9 / 3.10 Name /Address of Producer** – This is the name of the person or company which has reared and produced the animal or the Name of the Company which has produced the hatching eggs. In the case of animals it is important to provide as much information as possible as to the location of the farm or area where an animal has been reared. In the case of hatching eggs – The name and address of the Poultry Farm has to be provided.

**4 Name & Address of Consignee** - This is normally the same Name and Address as the person who is applying for the Import / Transit Permit. However, if the Consignee is different from the person who is applying for the Permit then please give the Full Name, address and other contact details of the person to whom the animals or hatching eggs are to be delivered in Afghanistan

**5 Mean of Transport** – Please indicate as appropriate.

**6 Intended Port of Entry** – Designation of Ports of Entry - The ports of entry which have been designated for the importation of animals and certain commodities have been designated. – Animals may only be imported through one or other of the ports defined by this Rule

**7 Intended Date of Entry** - Please provide an accurate estimate of the Date of Arrival of the Consignment.

**8 IN CASE OF AN APPLICATION FOR TRANSIT PLEASE PROVIDE THE FOLLOWING INFORMATION**

**8.1 Intended Port of Exit** – In order to plan the transit route, from the port of entry to the port of exit (including possible resting points for animals to be given food and water)– The Veterinary Inspector will provide all the information required on the Transit Permit.

**8.2 Intended Date of exit** – Please provide planned date of exit – This is important so that the DLS inspector can be informed in advance of the arrival of the consignment.



# ANNEXURE 4

## Sample Import Permit

**GOVERNMENT OF THE PEOPLES REPUBLIC OF BANGLADESH**  
**Ministry of Fisheries and Livestock**  
**Directorate of Livestock Services**

### Import Permit for Live animals and Hatching Eggs

1 Details of Live animals or hatching eggs to be imported – to be completed in BLOCK CAPITALS

Subject to the conditions listed under sections overleaf, authorization is hereby granted for the importation into Afghanistan of the live animals described at 1.3, above

|   |   |
|---|---|
| <p><b>1.1 Name &amp; Address of Consignor<sup>1</sup></b><br/>                 .....<br/>                 .....<br/>                 .....<br/> <b>Telephone No</b>.....<br/> <b>Email</b>.....</p>   | <p><b>1.2 Name and Address of Consignee<sup>2</sup></b><br/>                 .....<br/>                 .....<br/>                 .....<br/> <b>Telephone No</b>.....<br/> <b>Email</b>.....</p>   |
| <p><b>1.3 Description of Live animal or hatching eggs</b><br/> <b>Breed of live animal or hatching eggs</b>.....<br/> <b>Species</b> .....<br/> <b>Country of Origin<sup>4</sup></b>.....<br/> <b>Group Identity No<sup>5</sup></b>.....<br/> <b>Intended Use:</b> Human consumption <input type="checkbox"/><br/>                 Animal Feed <input type="checkbox"/> Animal breeding <input type="checkbox"/><br/>                 Laboratory diagnostic <input type="checkbox"/> Vaccine <input type="checkbox"/><br/>                 Other <input type="checkbox"/> Please specify.....</p> | <p><b>HS Code<sup>3</sup> ...</b> <input style="width: 100px;" type="text"/><br/> <b>Total Quantity</b> <input style="width: 50px;" type="text"/> <input style="width: 50px;" type="text"/><br/>                 No./Unit<br/> <b>Cage / crate / carton description /size<sup>6</sup>:</b><br/>                 .....<br/> <b>Total No. of Units</b> <input style="width: 100px;" type="text"/><br/> <b>Means of Transport:</b> Road <input type="checkbox"/> Air <input type="checkbox"/><br/> <b>Port of Entry</b>.....</p> |
| <p><b>1.5 Individual Animal Identification</b><br/> <b>Mark(s)</b>.....<br/>                 .....<br/>                 .....<br/>                 (more – provide list as attachment</p>   | <p><b>1.6 Age of Individual animals according to</b><br/> <b>Identification Marks</b>.....<br/>                 .....<br/>                 .....</p>  |
| <p><b>1.7 Name &amp; Address of Person Responsible for Import / Transportation</b><br/>                 .....<br/> <b>Phone No</b>.....<b>Email</b>.....</p>  |   |

**AUTHORISED VETERINARY INSPECTOR**

**NAME**..... **SIGNATURE<sup>7</sup>**   
**ADDRESS**.....

.....

**DATE (DD/MM/YYYY)**.....

|   |   |
|---|---|
| <p><b>Valid from</b>.....<br/>                 DD/MM/YYYY</p> | <p><b>1.10 Valid to</b> .....<br/>                 DD/MM/YYYY</p> |
|---|---|

PART 2 Zoosanitary Information

|                                     |  |
|-------------------------------------|--|
| <b>2.1</b>                          | <b>General Conditions of Import Permit</b>   |
| <b>General Conditions of Import</b> | <ol style="list-style-type: none"> <li>1. The animals shall be conveyed in a suitable conveyance with the space allocation as prescribed by Procedure made under the authority of the Animal Welfare and Control of Stray Animals Regulation to the welfare of such animals during transportation.</li> <li>2. A declared Journey plan indicating estimated time of departure, location and time of rest points, estimated time of arrival at port of entry.</li> <li>3. For Air Freight - The crate, cage or other form of container should meet the current requirements of the International Air Transport Authority (IATA) for biological products for each species, size of animal.</li> <li>4. All shipping and transport costs to be pre-paid by the consignor.</li> <li>5. Copies of following documents should arrive at BIP, Designated Port of Entry at least 48 hours prior to the arrival of the consignment:             <ol style="list-style-type: none"> <li>a. Certificate of Country of Origin / Certificate of Identity Registration.</li> <li>b. Bill of Lading.</li> <li>c. International Veterinary Certificate (Exporting country).</li> </ol> </li> <li>6. Other<br/>In the case of dogs, cats and horses coming from a country where Rabies is known to be endemic:</li> </ol> |

|  |  |
|--|--|
| <b>2.2</b>   | <b>Special Conditions of Import Permit</b> |
| <p><b>International Veterinary Certificate (EXPORT) shall state that:</b></p> <p>1.....</p> <p>.....</p> <p>2.....</p> <p>.....</p> <p>3.....</p> <p>.....</p> <p>4.....</p> <p>.....</p> <p>5.....</p> <p>.....</p> <p><b>NAME of OFFICIAL VETERINARIAN</b>.....</p> <p><b>ADDRESS:</b>.....</p> <p>.....</p> <p><b>TELEPHONE No:</b>..... <b>Email:</b>.....</p> |  |





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