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The following report was prepared under Package 74 Food Safety and specifically incorporating Sub-activitie: Develop a coordination mechanism between different ministries and develop a system for systematic collection and recording of information related to food safety incidence with reference to relevant products

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Abbreviations and Acronyms

AMR	Antimicrobial resistance
AMU	Antimicrobial Usage
AS&MQC	Animal Slaughter and Meat Quality Control (Act & Rules)
BAHIS	Bangladesh Animal Health Intelligence System
BFSA	Bangladesh Food Safety Authority
BSTI	Bangladesh Standards and Testing Institute
CA	Competent Authority
CC	City Corporations
CDIL	Central Diagnostic and Investigation Laboratory
DC	Deputy Commissioner
DLO	District Livestock Officer
DLS	Department of Livestock Services
FDIL	Field Disease Investigation Laboratory
FSA	Food Safety Act
FSTF	Food Safety Task Force
LDDP	Livestock and Dairy Development Project
MoC	Ministry of Commerce
MoE	Ministry of Environment
MoFo	Ministry of Food
MoFi	Ministry of Finance
MoFL	Ministry of Fisheries and Livestock
MoHFW	Ministry of Health and Family Welfare
MoU	Memorandum of Understanding
MRL	Maximum Residue Level
OTC	"over-the-counter" (sales of veterinary medicines)
PoAO	Products of Animal Origin
POM	Prescription Only Medicine
PVS	Performance of Veterinary Services (WOAH/OIE)
SPS	Sanitary and Phytosanitary Agreement of the WTO
TWG	Technical Working Group
UNIDO	United Nations Industrial Development Organisation
WOAH/ OIE	World Organisation for Animal Health (formerly the Organisation Internationale des Epizooties)
WTO	World Trade Organisation

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EXECUTIVE SUMMARY

This Policy Paper is prepared as one component of UNIDO's engagement with the World Bank funded Livestock and Dairy Development Project (LDDP) within the Ministry of Fisheries and Livestock (MoFL).

The Policy Paper provides background, context and pre-requisites for strengthening the coordination amongst Competent Authorities. It proposes a strategic pathway that can be followed by the DLS to strengthen coordination, communication and collaboration, internally, between the various Directorates, Departments, Units and sections within the DLS itself and, externally, with Competent Authorities with shared responsibility for the regulatory control of food safety of animal products along each of the major livestock value chains in Bangladesh.

The current structural organisation and allocation of responsibilities within the DLS does not clearly define roles and responsibilities of inspectors or managers and is not fully conducive to allow the efficient management of all its core regulatory functions related to the food safety of animal products. This Policy Paper proposes that consideration be given to the creation of a new organisational structure and the appointment of line managers at the headquarters, Divisional, District and Upazilla levels, as well as a field level inspectorate responsible for day-to-day engagement between the DLS and each category of food business operator (FBO).

A proposed Organogram based on the new organisational structure was presented and discussed with the DLS during a Workshop held in March 2023 where there was general agreement that the area of the "veterinary domain" which covers "Veterinary Public Health" is currently seriously underrepresented. It has been recommended that a new Directorate headed by a Director and to be named the Directorate of Veterinary Public Health and Food Safety shall be established.

The report proposes that a high level **Food Safety Task Force** (FSTF) be established within DLS that would have overall responsibility to strengthen the capacity of the DLS to undertake its mandate with respect to the food safety of products of animal origin (PoAO). Below the FSTF, a series of Technical Working Groups (TWG) are proposed each of which would report to the FSTF.

Finally it is proposed that a more formal basis for inter-agency coordination be developed through agreement of Memoranda of Understanding (MoU) between DLS and its partner institutions. Ultimately, the FSTF would be responsible for conversion of MoUs into secondary legislation that would define respective roles and responsibilities of partner institutions and competent authorities. A draft MoU is contained in Annex 2 to this report.

INTRODUCTION AND BACKGROUND

1. Project Context and Deliverable

This Policy Paper is prepared as one component of UNIDO's engagement with the World Bank funded Livestock and Dairy Development Project (LDDP) within the Ministry of Fisheries and Livestock (MoFL).

The interventions of UNIDO focus on two outputs, with the specific objective to improve the food safety systems for the protection of public health along the major livestock value chains. UNIDO's response supports Bangladesh in applying food safety and quality control measures in the livestock sector and thus, improving public health through ensuring basic food safety standards.

There are two key outputs identified:

- **Output 1: Food assurance and public health systems designed along livestock value chains;**
- **Output 2: Antimicrobial resistance (AMR) surveillance and risk mitigation program as well as surveillance and monitoring of microbial chemical and residual hazards are developed.**

The Policy Paper presented here contributes towards the achievement of **sub-component C2 of Output 1 - On food safety and public health by addressing food safety and quality assurance:**

Deliverable - Sub-activity 3.4:

"Develop a coordination mechanism between different ministries and develop a system for systematic collection and recording of information related to food safety incidence with reference to relevant products."

Furthermore, the Policy paper is prepared as achievement of the Terms of Reference for the International Food Safety Expert (Livestock Value Chains):

"Support the high-level dialogues by reviewing key background documents and as a result, develop together with national and international experts a policy paper on possible **Coordination mechanisms among Competent Authorities to ensure food safety compliance in food of animal origin**, including a **terms of reference for task force on coordination and regulatory update** in the existing framework and draft **a proposed MOU to define the future working relationships between the DLS and related competent authorities**".

2. Internal and External Coordination Policy rationale

The Policy Paper presented here is divided into two distinct areas of DLS responsibility:

1. **INTERNAL COORDINATION** within DLS (Interdepartmental coordination)
2. **EXTERNAL COORDINATION** with partner Competent Authorities (CAs)

Chapters 1 and 2 provide Background and Context and Pre-requisites for strengthening Coordination, whilst Chapter 3 of the Policy Paper proposes a strategic pathway to be followed by the DLS to strengthen **coordination, communication and collaboration, internally**, between the various Directorates, Departments, Units and sections within the DLS itself and, **externally**,

with Competent Authorities having shared responsibility for the regulatory control of food safety of animal products along each of the major livestock value chains in Bangladesh.

The strategic objectives defining this pathway are based upon a detailed analysis of the gaps in implementation of its regulatory functions that exist within the DLS which has already been presented to the LDDP and DLS in a series of Reports, Policy Papers and Workshops over the past two years (see List of Papers / Policy documents, Reports in Annex-3).

In particular, reference is made to the following documents:

- 1 “Performance assessment of veterinary services” (Dr. J. Woodford / Dr. Md. Mehedi Hossain - June 2022)
- 2 “Policy planning for required policy and legal reforms” (Dr. J. Woodford and Dr. Md. Mehedi Hossain - Sept 2023) originally submitted as: “Policy paper on the proposed food safety legal framework for food of animal origin” (Dr. J. Woodford and Dr. Md. Mehedi Hossein)
- 3 Policy Paper on the Proposed Food Safety Legal Framework for Food of Animal Origin (Dr. J. Woodford and M. Barry – September 2023).
- 4 Gap Assessment on Food Safety Incident Recording and Reporting System of Competent Authorities. (Dr. J. Woodford and Dr. Md. Mehedi Hossain (August 2023)
- 5 Policy Paper with Proposed Action Plan and Framework for Recording and Data Management System (Dr. J. Woodford and Dr. J. Hanks - September 2023)

In addition, both areas of [internal](#) and [external](#) coordination, communication and collaboration were also discussed in some detail by key stakeholders represented in Working Groups during Roundtable discussions at a Workshop held on 13th and 14th March 2023. The Working Group subjects for discussion included:

- 1 [Coordination in Food Safety Management](#)
- 2 [Internal and External Policy Dialogue](#)

The outcomes and recommendations made by the Working Group stakeholders at that time are now being incorporated into this Policy Paper.

During Roundtable discussion the Workshop participants identified the areas of shared interest, gaps, overlaps and challenges in implementation of regulatory functions relating to food safety management being undertaken by the five main [external](#) partners of the DLS, including:

1. [The Bangladesh Food Safety Authority \(BFSA\)](#) – with overall responsibility for coordination of all Competent Authorities with responsibility for food safety, including development of risk-based management decisions.
2. [The Bangladesh Standards and Testing Institute \(BSTI\)](#) – responsible for the setting of food safety standards for animal products and animal feeds including especially

permitted Maximum Residue Levels (MRLs).

3. **The City Corporations within the Ministry of Local Government (MoLG)**– responsible for the establishment and licencing of food processing, wholesale and retail sale facilities in City Corporation(12), Municipalities(320) , Upazilla Councils (492) and Union Councils (4,573) throughout Bangladesh.
4. **The Directorate General of Drug Administration (DGDA) of the Ministry of Health and Family Welfare**, responsible for the registration of imported veterinary medicines and biologicals and the raw materials required for domestic manufacture, the licencing of veterinary medicine and biological manufacturers, and the regulation of the distribution, sale and use of veterinary medicines and biologicals throughout Bangladesh.
5. **The Ministry of Health and Family Welfare (MoHFW) / Local Authorities** responsible for licencing and food safety HYGIENE management at food products of animal origin (PoAO) processing and retail sale facilities and for coordination of surveillance of antimicrobial resistance (AMR) within the public health sector.

Some of the important Challenges identified by Workshop participants included:

- Allocation of similar responsibilities for food safety control amongst different Competent Authorities;
- Inadequate capacity (numbers of inspectorate personnel and level of training) to implement enforcing activity within Competent Authorities;
- Lack of awareness of Livestock owners, food business operators and consumers on food safety standards and compliance issues;
- Lack of Risk analysis capacity to inform food safety management decision making;
- Weaknesses and / or no traceability of animal products and poor levels of disease surveillance;
- Insufficient Inter-agency coordination;
- Insufficient harmonization between Acts and rules administered by different Competent Authorities;
- Duplication of rules and regulations being implemented by different Competent Authorities.

Amongst the recommendations made by the Working Groups were the following:

- Recommendations for **INTERNAL POLICY DIALOGUE within DLS:**
 - Revision of DLS Organogram to allow effective management of Food Safety of PoAO (&AMR);

- Strengthening of Human Resources for food safety of PoAO – Workforce development – (Numbers, Knowledge & Skills, Job Descriptions);
- Precise identification of the most important regulatory functions for food safety of PoAO (roles and responsibilities) which belong to DLS.
- Revision of Legislation covering food safety of PoAO – Laws, and Rules, to clearly define roles and responsibilities of DLS and partner institutions.
- Recommendations for [EXTERNAL POLICY DIALOGUE with other Competent Authorities](#)
 - Inter-sectoral discussion (bilateral / multilateral) to resolve identified Overlaps & Gaps in the current management of food safety of PoAO;
 - Strengthen Coordination, Collaboration and Communication between DLS and other Competent Authorities with shared interest in food safety of PoAO;
 - Engage in discussion on analysis of legislation administered by DLS and other Competent Authorities covering food safety of PoAO to identify overlaps and / or lack of clarity of roles and responsibilities and reach agreement on what recommendations can be made to revise legislation accordingly.

Subsequently, following an examination and analysis of procedures being implemented by DLS and other Competent Authorities in the regulation of [Border Controls](#) and the [Import and Export](#) of animals, animal products, animal feed, including raw materials, it has become apparent that the DLS should also enter into dialogue with the National Board of Revenue of the Ministry of Finance (MoF) and the Ministry of Commerce (MoC) which is responsible for promulgation and gazetting of the Customs Act (1969), the Import and Exports Control Act 1950 and Import Policy Orders. The current Import Policy Orders have provisions that define technical sanitary requirements for the importation of a number of commodities, including, live animals, animal products and animal feeds. The responsibility for setting and enforcing these sanitary requirements should rest solely with the DLS which has the technical capacity to make such decisions based on risk analysis, in accordance with international standards of the World Trade Organisation (WTO) under the SPS Agreement and World Organisation for Animal Health (WOAH) standards detailed in the Terrestrial Animal Health Code and the Codex Alimentarius of the joint FAO/WHO Codex Commission.

FOOD SAFETY COORDINATION POLICY – PRE-REQUISITES

1. Structural Organisation and allocation of responsibilities within the DLS along major livestock value chains – Human Resources

The current structural organisation and allocation of responsibilities within the DLS does not clearly define roles and responsibilities of inspectors or managers and is not fully conducive

to allow the efficient management of all its core regulatory functions related to the food safety of animal products. It will not be possible for the DLS to fulfil its mandate for implementation of [all core food safety regulatory functions](#) unless significant changes are made in terms of the organisational structure of the DLS and the deployment of fully trained officials with clear mandates at all levels of the service from headquarters down to field level inspectorate officers.

Consideration should now be given to the creation of a new organisational structure and the appointment of line managers at the headquarters, Divisional, District and Upazilla levels, as well as a field level inspectorate responsible for day-to-day engagement between the DLS and each category of food business operator (FBO). Each appointment should be defined through a clear Job Description reflecting the required qualification, the key responsibilities to be assigned, to whom the staff member is required to report and identifying the personnel BELOW the post, in the case of managers at headquarters, Division, District and Upazilla levels, who shall be supervised by the appointees at each administrative level.

A Training Needs Assessment (TNA) should then be undertaken in order to identify shortcomings in the qualifications and level of training of officers (existing and new personnel) at all levels of the administration who will be responsible for implementation of the food safety regulatory functions of the DLS. On the basis of the TNA a new Training Plan should then be developed and implemented.

A proposed Organogram has been presented and discussed with the DLS during a Workshop held in March 2023. There is general agreement that the area of the “veterinary domain” which covers “Veterinary Public Health” is currently seriously underrepresented. It has been recommended that a new Directorate headed by a Director and to be named the Directorate of Veterinary Public Health and Food Safety shall be established.

Two other important areas of weakness identified in the existing structural organisation of the DLS have been:

- 1 Human Resources – capacity development
- 2 Domestic and International Trade

It was therefore agreed that in addition to the establishment of a Directorate of Veterinary Public Health & Food Safety, there should also be established a Directorate responsible for Human Resources Development as well as a Directorate of Domestic and International Trade, with responsibility for oversight and enforcement of standards for domestic and international trade of animals, animal products, animal feed and other high risk commodities which may present a risk to animal health, human health or the environment. (see draft proposed Organogram in Annex-5).

The above proposed actions are embodied in the proposed Strategic Objectives defined in the draft Food Safety Policy presented in the Paper entitled “[Policy planning for required policy and legal reforms](#)” (Woodford/Md. Mehedi Hossain/Rahman – September 2023). Amongst others, these included:

1. [Improve the structural organisation and institutional management of the Department of Livestock Services](#) to allow effective implementation of a food safety management

system from farm to fork.

2. **Strengthen capacity (staff numbers and resources) and capability (competency) of the Department of Livestock Services** to allow effective implementation of its legal mandates to regulate the safety of products of animal origin.

The proposed Directorate of Veterinary Public Health and Food Safety shall be responsible for implementing all food safety regulatory functions as well as the coordination of the surveillance, prevention and control of zoonotic diseases, the surveillance, prevention and control of antimicrobial resistance (AMR) and monitoring and control of residues found in products of animal origin destined for human consumption. A strong link exists between AMR surveillance, prevention and control and the monitoring of drug and other residues in animal products since, the two issues have a common cause – [the inappropriate use of antimicrobials and other veterinary medicines in food producing animals](#). Thus, Antimicrobial Usage (AMU) shall be a major area of regulatory interest of the Department of Veterinary Public Health and Food Safety.

It is therefore of critical importance that the senior management within the DLS firstly examines what are its core regulatory functions, according to the legislative mandates and then, on the basis of this understanding review the existing levels of manpower in terms of numbers of personnel at each level of the DLS administration from headquarters down to the field level to determine what level of staffing is required in order to perform each regulatory function effectively.

2. Review of Regulatory functions to ensure food safety of animal products

On behalf of LDDP the UNIDO national and international experts have undertaken a series of studies and engaged with key stakeholders in order to fully understand the current legislative framework for the regulation of the food safety of PoAO. The outcomes of these activities have been recorded in multiple deliverables prepared and submitted to the LDDP and DLS throughout the course of this project. A full list of the Policy Papers and Reports referenced in this Policy Paper is given in Annex-3.

The Policy Paper entitled “[Policy Paper on the Proposed Food Safety Legal Framework for Food of Animal Origin](#)”, Woodford/Barry – Sept 2023), identifies each of the principal pieces of legislation and their accompanying Rules or Regulations and the overlaps, gaps, lack of clarity and inconsistencies which need to be addressed through internal and inter-agency dialogue.

3. Summary of Gaps, overlaps, uncertainties and inconsistency in mandates in existing legislation

3.1 Implementation gaps of legally mandated regulatory functions.

- DLS and its mandate (Diseases of Animals Act and Animal Slaughter and Meat Quality Control Act) to license /register all animal product processing / slaughter facilities and conduct ante and post-mortem inspection of animals and meat [red meat slaughter facilities as well as wet markets for poultry slaughter];

- Lack of records of ante- and post-mortem findings reported to BAHIS.
- Lack of enforcement of over-the-counter (OTC) sales of prescription only medicines (POMs);
- Possible misuse of antimicrobials as growth promotants or feed additives in poultry industry;
- Lack of enforcement of requirements for recording the use of prescription only veterinary medicines (POMs) in food producing animals relating to “withdrawal periods” by the DGDA;
- No provisions in any legislation for the licencing of transporters of animals or animal products, although the Animal Slaughter & Meat Quality Control Rules, (2021) provide some poorly defined conditions for compliance of transporters in terms of disinfection of vehicles and maintenance of cold chain requirements.
- No animal identification, movement control or traceability of animals or animal products.

3.2 Overlaps of legal mandate between Competent Authorities

- Overlaps between DLS and CC’s over provision of animal health services to livestock producers in CC and Municipality jurisdictions as well as ante-/post-mortem inspection in CCs and Municipalities by DLS deputed veterinary officers and privately employed “veterinarians”, resulting in a conflict of interest);
- Overlaps exist between the powers and functions of the Bangladesh Food Safety Authority (BFSA) under the Food Safety Act (2015) and the Bangladesh Standards and Testing Institute (BSTI) for the determination and setting of permissible limits for contaminants and Maximum Residue Levels (MRLs) in foods including animal products;
- Potential overlap in responsibilities for setting safety standards for animal feeds between DLS and BSTI.
- The DGDA – established within the MoHFW is responsible for the regulation of the importation, registration, distribution, sale and use of Veterinary medicines. However, Section 17 sub-section (6) of the Import Policy Order (2021-2024), administered by the MoF in states: *“Registered Vaccines and diagnostic reagent used in fish and poultry industry will be importable subject to permission issued by the Department of Fisheries and Livestock”.*

3.3 Lack of clarity in the existing legislation

- Contradiction in use of terms between the requirement for “**registration**” given in The Diseases of Animals Act (2005) – Section-16 - *Registration for animal farm, animal origin product, processing plants, etc.*, whilst the Animal Slaughter & Meat Quality Control (AS & MQC) Act (2011) & Rules (2021) which make similar provisions requiring slaughter facilities to be “**licensed**” by a Licensing authority within the DLS;
- The City Corporation Act (2009) makes provisions for the City and Municipal Corporations to establish slaughter facilities for processing of meat within or without their jurisdictions subject to approval of the Government. However,

government owned animal product processing facilities are exempted from being registered under the Animal Disease Act (2005).

3.4 Inappropriate allocation of regulatory mandates to Competent Authorities

- Ante- and post-mortem inspection of animals and meat given to City Corporations and Municipality authorities; and
- the setting sanitary requirements for import of animals, animal products and animal feeds provided to the Ministry of Commerce, instead of the MoFL/DLS.

The proposed Policy outlined here is presented as a Step by Step process starting with the establishment of institutions to be given responsibility for taking forward the processes of internal and external coordination of food safety regulatory functions. Further steps will involve setting up bilateral / multilateral dialogue between the DLS, in collaboration with the BFSA and the other CAs with responsibility for conducting food safety regulatory functions. External dialogue should start first, since the DLS activities will to some extent depend on the outcome of deliberations and agreements reached in Memoranda of Understanding between the DLS and partner institutions.

In particular the following regulatory functions require to be correctly addressed through clear demarcation of the respective roles and responsibilities of each of the Competent Authorities with responsibility for implementation of food safety regulatory activities and correct definition of standards to be placed in Rules and regulations:

- 1 **Registration and / or licencing of Food Business Operators** (FBOs) (cattle / poultry farms, transporters of animals and animal products along the marketing chain, wet markets, milk vendors, milk collection centres, milk processing facilities, slaughter facilities / abattoirs, animal product retail outlets) along each of the major PoAO value chains – Overlaps exist between DLS and City/Municipal Corporations/Ministry of Health and Family Welfare (MoHFW) / Local authorities at District level and below.
- 2 **Routine inspection and auditing of FBOs to confirm compliance** with defined standards and conditions of registration / licencing (GAHP/GHP/HACCP, etc.).
- 3 **Environmental pollution controls** - waste disposal by FBOs and industrial waste management to ensure control of hazardous substances entering animal food chain. Detection and recording of incidents of non-compliance - Collaboration with MoE and MoHFW / BFSA.
- 4 **Regulation of safety of milk** through licencing and inspection of vendors, milk collection centres and processing facilities.
- 5 **Documentation** – (entry into database) of inspection records (compliance/non-compliance). – Currently not being recorded in any systematic way to allow data analysis and subsequent risk analysis.
- 6 **Animal movement control and inspection of live animal markets** – not currently being

undertaken by DLS. The Animal Disease Act makes provision for movement control, but only in the event of a suspected or confirmed notifiable disease event and then only for movement of animals and animal products into and out of a declared “infected area”. Rules for animal movement control need to be developed and implemented in order to prevent the spread of animal diseases as well as to aid with the traceability of animals from farm to slaughter facilities or for other purposes.

- 7 [Ante- and post-mortem inspection of animals and meat](#) – overlaps with City / Municipal Corporations. – Conflict of interests. – Documentation of inspection results – recorded into expanded database. BSTI has prepared a standard for ante- and post-mortem inspection, possibly in need of review and revision.
- 8 [Collection \(and documentation through recording in expanded database\) of animal product and other samples for AMR surveillance and residue monitoring](#).
- 9 [Early detection, investigation, reporting and documentation of suspected zoonotic disease outbreaks](#) – sharing of data and information with MoHFW.
- 10 [Animal feed quality and safety controls](#) –licencing and inspection of feed manufacturing premises, collection of feed samples for routine testing for presence of harmful residues – Documentation of all activities, records of samples collected and outcome of tests conducted. Some overlaps exist with Bangladesh Standards and Testing Institute (BSTI).
- 11 [Regulatory control of veterinary medicines used to treat food producing animals](#) – DGDA has primary responsibility for regulation of importation, registration and manufacture of veterinary medicines and biologicals, but DLS should start to introduce regulatory controls on the sale and use of veterinary medicines in public and private sectors through setting standards of practice for veterinarians and veterinary para-professionals and livestock producer end-users. Records only exist for use of veterinary medicines by Livestock Assistants employed at the public sector Veterinary facility level in some parts of the country through BAHIS reporting and recording system. Implementation of controls on “withdrawal periods” at the level of private veterinary service providers as well as livestock owners is lacking.
- 12 [Accreditation of veterinary diagnostic laboratories](#) with responsibility for suspected notifiable animal disease diagnostics, testing of samples of animal products and animal feeds for compliance with Maximum Residue Level (MRL) standards and for AMR surveillance.
- 13 [Regulatory control of Import and Export of animals, animal products and animal feeds,](#) including raw materials – overlaps with legislation promulgated by DLS and Ministry of Commerce.
- 14 [Border control activities to be undertaken by dedicated officers trained to implement border controls in line with SPS / WOAH international standards](#) – Issuance of Import permits and International Health Certificates (Export) and border control inspection procedures in collaboration with Customs authorities.
- 15 Clear understanding to be established with the BFSa as to how it can support the DLS

in terms of coordination and collaboration with other Competent Authorities as well as undertaking risk analysis in order to develop correctly prioritised risk management activities for food safety of animal products.

4. Production and Marketing Policy for products of animal origin

The government of Bangladesh places a high priority on the promotion of the export of Halal meat as is recorded in the following documents:

1. FE Circular No-35 of the Department of Foreign Exchange Policy, Bangladesh Bank dated 22 September 2019 where it is mentioned that a 20% export subsidy is available for exporting 100% Halal meat, along with other items.
2. Import Policy 2021-2024 (March 2021), section-5.4.1.17. - Halal meat export given highest priority under a government programme of special development for promotion of export product sector.
3. Islamic Foundation Halal Sanad Policy-2015 - (Sanad is a Bangla term, that means certificate),
4. IFA Halal Ordinance 2015. Proceeding of Bangladesh Halal Expo 2017. Dhaka: Islamic Foundation, Halal Division.
5. In September 2021, the BSTI added the provision of halal certification to the BSTI Regulations, 1989. Under this regulation the BSTI has started to issue halal certification, as a member of the Standards and Metrology Institute for Islamic Countries (SMIC), an Organisation of Islamic Cooperation body. In order to expand exports, the BSTI has adopted three international halal standards and will issue certificates according to the bar set by those standards.

In spite of these policy documents, there exists only one abattoir in Bangladesh which is accredited for the purpose of meeting international standards for the export of animal carcasses or meat, "Bengal Meat". In recent years, the price of meat on the domestic market has risen to the extent that the margin on the export of meat has narrowed considerably. For this reason, Bengal Meat is diversifying its domestic meat products in an attempt to capture the higher end of the domestic meat market in supermarkets, hotels and restaurants.

The processing of red and white meat in the domestic market relies on outdated marketing models whereby the infrastructures for processing of meat and meat products is largely held by government / local authority institutions. With the exception of Bengal Meat, there has been almost no involvement of the private sector in the commercial processing of red meat. In its place there exist vast numbers of small private meat businesses that both slaughter and retail meat who are not at all well-regulated and most of whom are not fully compliant with acceptable hygiene and environmental pollution standards. The processing of poultry meat in wet markets is poorly regulated and acceptable standards of hygiene and control of environmental pollution are not being met. The future viability of wet markets without regulation or control must be questioned.

In the dairy sector, the MoFL has placed high priority on self-sufficiency of production of

sufficient milk and milk products to satisfy domestic demand, yet there is no clear policy or strategy to develop a viable dairy sector that can produce sufficient volumes of milk from a regulated production system. There is an urgent need to engage with private sector investors, milk processing companies, farmer organisations and regulating agencies to develop a clear policy in relation to the expansion and regulation of the milk processing industry in order to ensure that sufficient quantities of safe and good quality milk products are available to consumers on the domestic market.

Similarly, in the poultry industry, whilst the level of production of poultry meat and eggs is now meeting domestic demand, the marketing and processing of most poultry meat in wet markets is out-dated and not at all well-regulated in terms of standards of hygiene and environmental pollution due to inappropriate production standards, animal welfare practices and an absence of wastewater management. There is an urgent need to review policies and develop a modern approach towards the marketing and processing of poultry meat.

COORDINATION POLICY

Both internal and external coordination of food safety programmes are essential in order to ensure that all aspects of food safety of animal products are being undertaken effectively and efficiently in terms of utilisation of scarce human and financial resources and in full compliance with international best practices and standards.

1. STEP-1 Establishment of Food Safety Task Force and Technical Working Groups

In the first instance, it is proposed that a high level **Food Safety Task Force** (FSTF) is established within DLS. The FSTF shall take overall responsibility for taking forward the programme to strengthen the capacity of the DLS to undertake its mandate with respect to the food safety of products of animal origin (PoAO). A draft Terms of Reference for the FSTF may be found in Annex 1 to this Policy Paper.

Below the FSTF, it is proposed that there would be established a series of Technical Working Groups (TWG) each of which shall report to the FSTF. Consideration may be given to establishing at least the following TWG's:

1. TWG for Registration and Inspection of Food Business Operators (Director of Administration with Deputy Director of Farms, Deputy Director of Legislation, Director of Animal Health, Deputy Director of Animal Production).
2. TWG for Data and Information Management (Epidemiology Unit/BAHIS)
3. TWG for Animal Feeds Safety and Quality (Director of Administration, Deputy Director of Farms (Quality Control), Deputy Director of Animal Health (Safety control);
4. TWG for Import / Export and Border Control of Animals and Animal Products (Directorate

of Domestic and International Trade – Risk Management Unit)

5. TWG for Food Safety of PoAO Standards (Directorate of Veterinary Public Health Food Safety Section / AMR section)
6. TWG on Zoonotic disease surveillance, prevention and Control (Directorate of Veterinary Public Health – Zoonotic Disease Section, Deputy Director of Animal Health, Epidemiology Unit)
7. TWG for AMR and Drug/chemical residues surveillance and control (Directorate of Veterinary Public Health, AMR Section, Head of CDIL and QC laboratories)
8. TWG for Veterinary Medicines Registration, Manufacture, Distribution, Sales and Usage (Directorate of Animal Health, Directorate of VPH-AMR Section, Bangladesh Veterinary Council)
9. TWG for Laboratory Diagnostic Services (CDIL, FDILs, QC Lab, BLRI)

Under the supervision and direction of the FSTF, each Technical Working Group shall develop its own Terms of Reference and Action plans to cover the areas of interest implied in their respective titles. Guidance on the tasks to be carried out by each TWG are given in the Matrices provided in Annexes 3A and 3B of this Policy Paper. The activities of the Technical Working Groups should be formulated in such a way so as to achieve the [Strategic Objectives](#) outlined in the Policy Paper entitled “Policy Planning for required Policy and Legal Reforms, as well as each of the gaps, overlaps and challenges already identified in the succession of other Policy Papers listed in Annex 4 of this Policy Paper.

However, this process cannot begin until there have been both internal reforms in terms of structural organisation of the DLS as well as agreement between the DLS and its partner organisations as to their future respective roles and responsibilities, filling gaps, ironing out overlaps and clarifying uncertainties with respect to the implementation of food safety regulatory functions, the recording of actions taken and the outcomes of regulatory enforcement (incident recording) and follow-up actions to be taken.

2. STEP-2 Supervision and facilitation of External Coordination meetings

The FSTF shall initiate and manage a continuous process of inter-sectoral dialogue with partner institutions in collaboration with the BFSa. Initially such meetings will involve the high level administrative decision makers to inform them of the technical issues to be the subject of more detailed technical discussions which will be undertaken by the TWGs with technical level personnel representing each of the respective CAs. It is recommended that partner institutions also establish their own TWGs who can then interact with the relevant DLS TWGs. The FSTF will communicate all outcomes of meetings between TWGs

and partner institution technical personnel to the BFSA and to the partner institution administrative level personnel.

The FSTF shall be responsible for leading meetings for the negotiation of Memoranda of Understanding (MoU) to be reached between the DLS and partner institutions. Ultimately, the FSTF shall be responsible for conversion of MoUs into secondary legislation that defines respective roles and responsibilities of partner institutions / CAs.

A draft Memorandum of Understanding between the DLS and the BFSA is provided as a sample for adaptation for use with other CAs in Annex-2 of this Paper. Once bilateral discussions have allowed for an agreement on the resolution of issues and a clear demarcation of respective roles and responsibilities to be reached, new MoUs can then be drawn up between the DLS and each CA currently having overlapping or lack of clarity between their respective regulatory responsibilities.

3. STEP THREE - Supervision and facilitation of Internal Coordination meetings

Internal Coordination will be undertaken in order to ensure that activities being undertaken under each of the Directorates of Human Resources, Animal Health, Animal Production, Domestic and International Trade and Veterinary Public Health and Food Safety are being implemented in such a way that they complement each other, follow a logical chronological timeframe, avoid planning implementation of activities with the same target groups at the same time and ensuring that actions are coordinated in such a way as to ensure that limited human and financial resources are used most effectively.

Both internal and external coordination will be managed by the same FSTF and TWG structure. However, in the case of internal coordination, the planning process will be undertaken in collaboration with the Directorates of Policy and Planning and Administration. The issues to be addressed and the Directorates, Units and Sections to be involved are provided in the Matrix found in Annex-3B.

4. STEP 4 Communication Planning

Once clear policies have been developed between the public and private sectors for the modernisation of the marketing and processing of animal products, bringing them in line with modern best practices and allowing for more effective controls to be put in place, the DLS can start to build up its capacity for fulfilling its mandates for food safety regulatory actions. Amongst these activities, the creation of awareness amongst stakeholders of the changes in legislation and of the standards which are expected of them, in terms of compliance, is perhaps one of the most important. For the sake of transparency, it is important that FBOs are fully aware of the powers and authority provided to Competent Authorities in

the new legislation, especially the new Rules defining standards and conditions of licensing / registration of premises.

Consumers of animal products are equally important, for it is they who will be the ultimate beneficiaries of the enforcement and compliance with such standards. For the sake of transparency, all stakeholders should be aware of the powers and authority of the Competent Authorities to implement and enforce standards. Furthermore, there is a need for consumer awareness around food safety to be better developed through communications from the competent authorities. This is an essential element in building trust and developing stronger consumer demand for products produced under higher food safety standards.

The DLS is recommended to establish a dedicated Communication Unit under the Directorate of Administration. Each of the Directorates within the DLS with responsibility for setting and enforcing standards should then collaborate and coordinate the development of awareness messages for livestock owners, each value chain actor who has a role to play in handling animal products along the value chains, animal product processors and retailers. The messages should convey Good Animal Husbandry Practices (GAHP), Good Management Practices (GMP) and Good Hygiene Practices (GHP) standards as have been developed in Rules, Guidelines and Standard Operating Procedures to ensure consistency.

Communication planning involves the development of suitable messages using the appropriate media tools for each different type of audience. Technical officers within the DLS can provide the technical content, but communication experts are needed to develop and communicate the messages to the target audiences.

The DLS is recommended to develop and implement a comprehensive Food Safety of PoAO Communication Plan through collaboration with each of its partners both internally and externally

ANNEX 1

Terms of Reference – Food Safety Task Force (FSTF)

1. Reports to the Secretary responsible for Livestock in the MoFL.
2. Coordination of all aspects for the intervention of Food Safety of Products of Animal Origin (PoAO) within the Ministry of Fisheries and Livestock (MoFL).

3. In collaboration with registered food business operators and partner institutions take the lead in formulating Policies for the development of Livestock Value Chain Marketing and infrastructures to bring them in line with international food processing and environmental hygiene standards.
4. With technical inputs from Technical Working Groups prepare and implement a Coordination Plan to harmonise the planning and implementation of food safety regulatory functions, capacity building and communication between the DLS Departments with responsibility for implementing veterinary public health and food safety activities.
5. Lead the process of engagement with external partners in reaching agreement on the respective roles and responsibilities of each Competent Authority with responsibility for the regulation of the food safety of PoAO.
6. Oversee the establishment and management of (Food Safety of PoAO) Technical Working Groups (TWG).
7. Supervise and provide administrative oversight of the planning and implementation of Annual Work plans for each TWG.
8. In collaboration with Directorate of Policy, planning and M&E develop annual action plans for each Technical Working Group.
9. Hold monthly Internal Coordination meetings all with Heads of TWGs.
10. Hold bi-monthly meetings with each TWG to monitor progress and address shortcomings in implementation of planned activities.
11. Participate in One Health Coordination meetings with MoHFW, MoE and other One Health partners.
12. In collaboration with the BFSA Play a lead role in the organisation and implementation of External Coordination meetings representing the DLS with the Heads of Directorates within of the external Competent Authorities in the areas of:
 - a. Bilateral Policy and Legislative Framework Review and Revision – Roles and Responsibilities, Standard Setting / Enforcement. Development of Memoranda of Understanding; Joint development of Rules and Regulations governing Food Safety of PoAO.
 - b. Communication of Data and Information sharing between Competent Authorities to be established through a regular formal reporting system.
 - c. Public Awareness of Food Safety Standards - Consumers

- d. Capacity Development - Livestock producers, Value Chain Actors, (transporters, traders, processors, marketing / retail sale operators.
13. Supervise the conduct of bilateral coordination meetings between Technical Working Groups and external Competent Authorities.
14. In collaboration with the Bangladesh Food Safety Authority (BFSA) plan and undertake quarterly external coordination meetings with each of the external food safety Competent Authorities (BSTI, DGDA, City/Municipal Corporations/MoLG, MoHFW/DGDA, MoHFW Public Health Directorate, MoE, MoC/MoF (Import/Export control of animals and animal products).
15. On the basis of agreements reached by TWGs and technical representatives of partner Competent Authorities, formulate Memoranda of Understanding between the DLS and partner CA's defining respective roles and responsibilities and other technical agreements.
- 16 Prepare and submit to the Ministry an Annual Report and Annual Implementation and Investment Plan for budgeting purposes.
- 17 In collaboration with Directorate of Policy and Planning, develop a monitoring framework with clearly defined measurable indicators of progress to continuously monitor the process of strengthening the implementation and documentation of food safety regulatory functions, evaluate the outcome of monitoring and adjust implementation and investment plans accordingly.

ANNEX 2

Draft Memorandum of Understanding between DLS and the BFSA

MEMORANDUM OF UNDERSTANDING

On

Working Arrangements Between

The Department of Livestock Services of Bangladesh

And

[PARTY 2]

Whereas the Department of Livestock Services (hereinafter referred to as "DLS") and [PARTY 2] (hereinafter collectively referred to as the "Parties" or

“Organizations”), in the context of their respective mandates stipulated by [Legislative reference to DLS] and [Legislative reference to PARTY 2];

Operating within the legal framework of the Ministry of Fisheries and Livestock, the Department of Livestock Services (DLS) is the principal organisation with responsibility for the delivery of services to livestock farms and for ensuring safe animal production, animal health, welfare and veterinary public health, including the safety of food of animal origin destined for human consumption.

The Bangladesh Food Safety Authority (BFSA) was established in 2015 as an entity of the Ministry of Food (MoF) under the authority of the Food Safety Act (2013). Its mandate includes the provision of scientific support to scientifically define foods and provide support to authorities or organizations in updating quality parameters, and monitor the implementation of their activities to ensure food safety; to render necessary support in updating food standards or guidelines to the highest level of safety under existing laws and to specify food standards and formulate guidelines, where no quality and safety parameter or guideline of such food is determined under existing laws.

Recognising the shared mandate of the parties in the regulatory oversight of food safety in Bangladesh and specifically in foods of animal origin, notwithstanding the specific legal obligations of DLS and BFSA, it is appropriate to recognise areas of mutual interest in the enforcement of food safety regulatory controls.

Accordingly, the Directors-General of DLS and BFSA, on behalf of their respective Organizations, have concluded this Memorandum of Understanding on Working Arrangements in mutually agreed areas of common interest, hereinafter referred to as “MOU” dated [DD.MM.YYYY].

ARTICLE I

Purpose

The purpose of this MOU is to improve the efficacy of regulatory compliance mechanisms for food of animal origin in the livestock sector in Bangladesh through targeted and mutual coordination of enforcement activities.

Scope

The scope of this MOU will be the agreed activities identified in technical discussion of the Directors-General of DLS and BFSA, but within the legal mandate of each organisation.

ARTICLE II

Areas of collaboration

Recognising that five competent authorities¹ have regulatory oversight of the food safety of foods of animal origin empowered by legislation and regulatory provisions, in the functions of standard setting, compliance verification and enforcement of food safety regulatory controls for foods of animal origin;

That DLS as the primary food safety regulatory body for primary production and BFSA as the science-based regulator offering scientific support to the overall decision-making process; share areas of mutual interest and operation and specifically in the following 3 areas;

1. Coordination between respective agencies with shared interests of regulatory control along the value chains for food of animal origin to agree on the respective responsibilities of control points in terms of enforcement.
2. Data-sharing for improved risk communication, risk-profiling of the livestock sector and identification of possible risks related to the safety of foods of animal origin.
3. Establishment of a coordination mechanism at operational level among inspectors / enforcement agents / food safety officers.

ARTICLE III

Coordination

The Parties will seek to facilitate the effective and cost-efficient attainment of the MOU's objectives, with the view to avoiding duplication of activities and striving for synergy between the Parties through harmonized protocols and procedures.

For the successful achievement of this, DLS and BFSA may approach other parties for further coordination of regulatory mandates for food of animal original.

Where required, the Parties can agree on the provision of regulatory enforcement to avoid enforcement gaps along the supply chain with the written agreement of the other Party, specifying the duration and geographical location.

ARTICLE IV

Visibility

All joint activities arising under this Memorandum will be carried out in the name of both Organizations, who will be given equal recognition. Modalities for the equal recognition will be mutually agreed between the Parties.

¹ Department of Livestock Services, Ministry of Fisheries and Livestock; Bangladesh Standards and Testing Institution (BSTI), Ministry of Industries; City Corporations, Ministry of Local Government, Rural Development and Cooperatives; Directorate General of Drug Administration (management of veterinary drugs), Ministry of Health and Family Welfare; and Bangladesh Food Safety Authority, Ministry of Food

ARTICLE V

Use of name, abbreviation, emblem and logo

Neither Organization will use the other Organization's name, abbreviation, emblem and logo in any form or manner without prior written authorization from the other Organization.

ARTICLE VI

Review of cooperation

Senior level meetings will be held once a year between representatives appointed, respectively, by the Directors-General of DLS and BFSA to review challenges and enforcement gaps along the value chain for food of animal origin and to discuss policy, technical and operational issues related to the furtherance of the objectives of the present Memorandum.

If such a review indicates the need to amend this Memorandum, the amendment shall be effected in accordance with Article VII. The place of meetings alternates between the headquarters seats of both Organizations.

Biannual technical level consultations will be held to advance progress in the areas listed in Article II.

DLS and BFSA will each nominate a focal point with a view to ensure the coordination within each respective Organization's internal services and with the other Organizations for the successful implementation of activities.

ARTICLE VII

Amendment and notices

The Parties may, by way of a simple exchange of letters, amend any provisions of this Memorandum.

Any notice or communication transmitted in application of this Article or of any other Article of this Memorandum shall be sent and/or received, as applicable, by the focal points identified in Article VI.

ARTICLE VIII

Entry into force and duration

This Memorandum shall replace the Memorandum of Understanding on Working Arrangements concluded between the Parties on [DD/MM/YYYY].

This Memorandum shall enter into force on the date of signature by the Directors-General of DLS and BFSa

It shall remain in force until terminated in accordance with Article X hereof.

ARTICLE IX

Privileges and immunities

Nothing in or relating to this Memorandum shall be deemed a waiver, whether express or implied, of any of the privileges and immunities of DLS and BFSa.

ANNEX 3A

External Coordination Activity Matrix – DLS Technical Working Groups

Technical Working Group	Partner Competent Authority / Ministry	Legislation references	Activity / Issue to be resolved /Regulatory function	Objectively Verifiable Indicators
Registration and Inspection of Food Business Operators	BFSa Ministry of Local Government City Corporations Municipalities District Councils Upazilla Councils	Section 16 Animal Disease Act / Animal Disease Rules Animal Slaughter & Meat Quality Control (AS & MQC) Act (2011) & Rules (2021) Section 42 and Schedule III of the Local Government (City Corporations) Act (2009)	Which Competent Authority shall be responsible for registration or licensing of each category of FBO Which CA shall be responsible for provision of animal health services in each level of jurisdiction Transfer of responsibility for all ante- and post-mortem inspection, recording and reporting to DLS	Number of Licenses issued per activity and rejected. Minutes of bilateral / multilateral meetings MoA detailing the respective roles of DLS and CCs/ Municipalities/ other local authorities for registration / licensing of each category of FBO Minutes of TWG meetings

Technical Working Group	Partner Competent Authority / Ministry	Legislation references	Activity / Issue to be resolved /Regulatory function	Objectively Verifiable Indicators
Data and Information Management	BFSA ALL	Animal Health / Food Safety Rules to be developed	Sharing of INCIDENT records with each CA to inform risk analysis and improve enforcement and compliance	Minutes of bilateral / multilateral meetings; Numbers of Monthly, quarterly Reports shared with external partners
Animal Feeds – Safety and Quality TWG	BFSA Ministry of Commerce Import Control Authority within the National Board of Revenue of the Ministry of Finance	Fish Feed and Animal Feed Act (2010), Animal Feed Rules (2013) Animal Feed Production and Marketing Guideline (2020).	Negotiation for DLS to take full control for setting technical standards to be met for importation of animal feeds and raw materials for their manufacture	Minutes of bilateral / multilateral meetings; MoA giving DLS full control for setting sanitary requirements for import of animal feeds and raw materials. Revised Import Policy Order
Import / Export and Border Control of Animals and Animal Products	BFSA Ministry of Commerce Import Control Authority within the National Board of Revenue of the Ministry of Finance	Section 24 (A) - Animal and Animal Product Quarantine Act, (2005). Customs Act (1969) Imports and Exports (Control) Act, 1950 and Import Policy Orders	Harmonise principal legislation and formulate new Rules to ensure that the DLS has primary responsibility for setting sanitary requirements for importation of live animals, animal products and other high risk commodities as well as authority to inspect and issue Import Release Orders prior to importation by Customs Authority of same commodities	Amendments to principal legislation, as required. Memoranda of Agreement New Rules to support implementation of Animal Product Quarantine Act In accordance with SPS and WOH standards

Technical Working Group	Partner Competent Authority / Ministry	Legislation references	Activity / Issue to be resolved /Regulatory function	Objectively Verifiable Indicators
Food Safety of PoAO Standards	CC's and Municipalities, MoLG MoF BSTI MoHFW BFSA	Diseases of Animal Act (2005) Rule 18 and Schedule 6 of the Disease of Animals Rules, (2008), Food Safety Act The Local Government (City Corporations) Act (2009)	Harmonisation of principal and subsidiary legislation in order to introduce food safety control standards using HACCP principles along each livestock product value chain from production to processing and retail; Revision of Rules using normative language ensuring legal certainty; Sharing of records of incidents of food safety (detection of residues / food poisoning incidents etc between DLS and MoHFW). Standard setting for acceptable levels of contaminants / residues	Minutes of bilateral / multilateral meetings; Memoranda of Agreement Harmonised principal legislation New Rules defining standards to be met by FBOs to ensure the safety of PoAO from farm to fork Communications between DLS and MoHFW to share incident records
Zoonotic disease surveillance, prevention and Control	MoHFW – Public Health Directorate BFSA	Diseases of Animals Act (2005) Diseases of Animals Rules (2008)	Review and revise Act and develop Rules to allow effective surveillance, prevention and control of zoonotic diseases in collaboration with the MoHFW; Reporting of suspected dog-bites in humans to DLS / suspected cases of Rabies in animals to Public Health Directorate of MoHFW	Minutes of bilateral / multilateral meetings MoU Proposed amendments to Diseases of Animal Act and new Rules defining One Health relationship for collaboration between DLS and Public Health Directorate of MoHFW
AMR and Drug/ chemical residues	DGDA MoHFW – Public Health Directorate BFSA	Diseases of Animal Act (2005) Diseases of Animal Rules (new)	Formulation of Rules to control the sale and use of antimicrobials; Sharing of data and information on incidents of AMR / residues detected between DLS & MoHFW	Minutes of bilateral / multilateral meetings MoU

Technical Working Group	Partner Competent Authority / Ministry	Legislation references	Activity / Issue to be resolved /Regulatory function	Objectively Verifiable Indicators
Veterinary Medicines - Registration, Manufacture, Distribution, Sale and Usage	DGDA MoHFW Bangladesh Veterinary Council	Drug Act, (1940), the Drug Rules (1945), the National Drug Policy (2005) and the Drug Control Ordinance (1982). Section 6 (iii) of the National Drug Policy (2005) Section 17 sub-section (6) of the Import Policy Order (2021-2024) Veterinary Council Act 2019 and Rules	Negotiation to allow strong veterinary pharmacology expertise to represent veterinary interests in DGDA; New Rules to be formulated to regulate the sale and use of POMs and enforcement of “withdrawal periods” of medicines used to treat food producing animals. Veterinary Inspectors to be given authority to enforce prevention of OTC sales of POMs/ withdrawal period recording	Minutes of bilateral / multilateral meetings; MoA between DLS and DGDA New Rules to regulate sale and use of veterinary medicines Records of detection of illegal sales of POMs Records of detection of non-compliance with requirements for recording Withdrawal periods of medicines used to treat food producing animals
Laboratory Diagnostic Services	Bangladesh Accreditation Board BSTI Ministry of Industries BFSA	Bangladesh Accreditation Act (2006)	Accreditation of all veterinary laboratories to ensure accuracy of food safety tests and analyses	Minutes of bilateral / multilateral meetings Laboratory Accreditation Certificates

ANNEX 3B

DLS - Internal Coordination Activity Matrix

Technical Working Group	Lead / partner Directorate / Unit / Sections in DLS	Legislation references	Activity / Issue to be resolved / Regulatory function	Objectively Verifiable Indicators
Registration and Inspection of Food Business Operators	Director of Administration Deputy Director of Animal Health Directorate of Animal Production Director of Veterinary Public Health	Section 16 Diseases of Animals Act (2005) Diseases of Animals Rules (2008) Animal Slaughter & Meat Quality Control (AS & MQC) Act (2011) & Rules (2021)	Define technical standards to meet by each category of FBO for initial and continued compliance as basis for initial registration / licencing and maintenance of registration / licencing based on GAHP/GMP Guidelines / SoPs	Lists of standards to be met by each category of FBO
			Develop, plan and implement training courses to train FBO managers on standards and how to be compliant	Training course materials Training plan Lists of trainees attending training courses
			Develop initial licencing checklist of standards for inspectors	Inspector's Checklist of defined standards / conditions
			Develop ad hoc audit checklist for use by inspectors	Inspector's ad hoc Audit of FBO premises checklist
			Planning of Initial Registration of Cattle and Poultry Farms Planning of ad hoc audits based on random selection of premises Analysis of outcomes of inspections/ Incidents recorded	Inspection plans for initial registration of cattle / poultry farms by Division / District level Reports detailing information on incidents of non-compliance based on analysis of records
			Formulate new Rules for licencing of transporters of animals and animal products	Rules to require licencing of animal / animal product transporters Rules to define standards to be met by transporters

Technical Working Group	Lead / partner Directorate / Unit / Sections in DLS	Legislation references	Activity / Issue to be resolved / Regulatory function	Objectively Verifiable Indicators
Data and Information Management	<p>Directorate of Animal Health BAHIS</p> <p>Directorates of Animal Health and Animal Production</p> <p>Human Resources</p>		<p>Design data recording application to be used by inspectors</p> <p>Train inspectors on how to access database and on recording and reporting of data</p> <p>Establish and train Risk Analysis Team to analyse data and develop information reports</p>	<p>Smart phone application</p> <p>Numbers of trained inspectors</p> <p>Data records entering data management system</p> <p>Reports with Information derived from Database records</p>
Animal Feeds – Safety and Quality	<p>Director of Administration</p> <p>Deputy Director of Farms</p> <p>Director of QC laboratory</p>	<p>Fish Feed and Animal Feed Act (2010), the Animal Feed Rules (2013) and the Animal Feed Production and Marketing Guideline (2020).</p>	<p>Review and revise Rules as necessary to ensure safety of animal feeds</p> <p>Develop a framework for the registration and regulation of feed business operators.</p> <p>Establish framework for sample collection and testing of samples to check for compliance with feed safety standards</p> <p>Analysis of feed safety incident records</p>	<p>Rules to define Feed Safety Standards</p> <p>Records of sampling and testing of Animal Feeds</p> <p>Reports providing information derived from records of feed safety incidents</p>

Technical Working Group	Lead / partner Directorate / Unit / Sections in DLS	Legislation references	Activity / Issue to be resolved / Regulatory function	Objectively Verifiable Indicators
Import / Export and Border Control of Animals and Animal Products	New Directorate of Domestic and International Trade Directorate of Human Resources	Section 24 (A) Animal and Animal Product Quarantine Act, 2005. (new) Rules	Formulate Rules to define procedures for import of animals and animal products, before entry into Bangladesh, at the border and after entry into Bangladesh. Establish capacity (sufficient numbers of adequately trained personnel) at all levels within the Directorate of Domestic and International Trade Establish Import Risk Analysis Team	New Rules for Import of animals and animal products Job Descriptions Numbers of staff trained Formal establishment of an Import Risk Analysis Team
Food Safety of PoAO Standards	Directorate of Veterinary Public Health & Food Safety Directorate of Human Resources	Animal Slaughter and Meat Quality Control (AS&MQC) Act (2011) Animal Slaughter and Meat Quality Control Rules, (2021)	Recruit and train sufficient numbers of personnel at each levels of the administration, (headquarters, Division, District, Upazilla) to undertake and implement all regulatory functions according to DLS mandate	Numbers of personnel recruited and trained Records of regulatory functions being undertaken Records of non-compliance or food safety incidents being recorded
Zoonotic disease surveillance, prevention and Control	Directorates of Animal Health & Production	Diseases of Animals Act and Rules	Regulation of animal breeding to control risks of spread of zoonotic animal breeding diseases; Surveillance and Outbreak investigation of suspected cases of zoonotic diseases; Compulsory reporting of all cases of abortion in cattle and small ruminants.	New Rules to define conditions for use of breeding bulls/ sheep/ goat bucks; New Rules for compulsory reporting of all cases of abortion; No of cases of zoonotic diseases detected.

Technical Working Group	Lead / partner Directorate / Unit / Sections in DLS	Legislation references	Activity / Issue to be resolved / Regulatory function	Objectively Verifiable Indicators
AMR and Drug/ chemical residues	Directorate of Veterinary Public Health & Food Safety BAHIS Directors of CDIL, FDILs and QC Lab Directorate of Human Resources	Diseases of Animal Act and Rules Animal Slaughter and Meat Quality Control Act and Rules	Finalise and implement AMR surveillance Strategy and Residue Monitoring Plan; Provide training to VPH line managers to supervise sample collection and follow-up of incidents, where traceability has been established; Develop application for recording of sampling and laboratory test results; Analysis of data to inform risk assessment for adaptation of sampling strategies	Number of AMR / residue samples being collected Number of AMR / residue samples tested Number of AMR / residue incidents recorded Documentation of adaptation of Sampling strategies based data analysis and risk assessment.
Veterinary Medicines - Registration, Manufacture, Distribution, Sales and Usage	Directorate of Animal Health Bangladesh Veterinary Council	Diseases of Animal Act and Rules Veterinary Council Act and Rules	Formulation of Rules to regulate sale of prescription only medicines Formulation of Rules under Vet Council Act to oblige veterinary surgeons and veterinary para-professionals to use veterinary medicines correctly; Rules to ensure recording of the use of veterinary medicines in food producing animals by veterinary surgeons VPPs and livestock keepers and observance of withdrawal periods; Periodic review of antimicrobial usage by the veterinary professions / livestock owners	New Rules to regulate the sale of prescription only veterinary medicines New Rules to define correct usage of veterinary medicines by veterinary practitioners New Rules relating to the recording of the use of veterinary medicines in food producing animals and observance of withdrawal periods

Technical Working Group	Lead / partner Directorate / Unit / Sections in DLS	Legislation references	Activity / Issue to be resolved / Regulatory function	Objectively Verifiable Indicators
Laboratory Diagnostic Services	Directorate of Animal Health CDIL, FDILs, QC laboratory, BLRI	Diseases of Animal Act and Rules Bangladesh Accreditation Act (2006)	Formulate new Rules to identify national reference laboratories, to define national veterinary diagnostic laboratory network, responsibilities of the national reference laboratory; Approval or authorisation of other laboratories to perform “official” tests and analyses; Develop strategy for accreditation of diagnostic tests and analyses for confirmation of food safety of animal products and AMR	Rules to define the veterinary diagnostic laboratory system Rules to define the responsibilities of the national veterinary laboratory and approved / authorised veterinary laboratories; Number of tests accredited nationally and internationally (ISO 22000/2021).

ANNEX 4

List of Activities and Deliverables relating to existing Legislative Framework for the regulation of Food Safety of PoAO

Activity Number	Deliverable Title	Authors / Titles	Date
Key Activity 1	Develop gap analysis of existing legislation of food safety enforcement		
1.1.1	Gap analysis of legal and policy framework in the livestock sector	Senior Technical Lead in Food Regulatory Science International Food Safety Specialist – Dr. Samuel Godefroy	March 2022
1.1.2	Performance assessment of veterinary services	National International Food Safety Expert (Livestock Value Chain) Dr. John Woodford National Food Safety Expert – Dr. Md. Mehedi Hossain,	June 2022

1.1.3	Food Safety Regulatory Landscape Study and Investment Plan	Senior Technical Lead in Food Regulatory Science, Dr. Samuel Godefroy International Food Safety Specialist, Mr. Michael Barry National Legal Expert – Dr. Md. Abu Abdullah	March 2022
1.1.5	Actor-based surveys and data collection	National Livestock and Dairy Expert, Dr. S.M Rajiur Rahman ; International Food Safety Expert (Livestock Value Chain) Dr. John Woodford	September 2023
1.1.7	Assessment on border and import/export control practices related to food of animal origin and veterinary support products	International Food Safety Expert (Livestock Value Chain) Dr. John Woodford National Food Safety Expert (Livestock Value Chain) Dr. Md. Mehedi Hossain	August 2023
1.1.8	Policy planning for required policy and legal reforms	International Food Safety Expert (Livestock Value Chain) Dr. John Woodford	July 2022
Key Activity 2	Draft legal amendments and regulations for stronger food safety enforcement in relevant value chains		
1.1.9 & 1.2.1	Policy paper on the proposed food safety legal framework for food of animal origin	International Food Safety Expert (Livestock Value Chain) Dr. John Woodford International Senior Specialist, Food Regulatory Framework – Mr. Michael Barry	August 2023
Key Activity 3	Develop baseline data on current level of food safety in relevant value chains		
1.3.3	Gap Assessment on Food Safety Incident Recording and Reporting System of Competent Authorities.	International Food Safety Expert (Livestock Value Chain) Dr. John Woodford National Food Safety Expert (Livestock Value Chain) Dr. Md. Mehedi Hossain	November 2022
1.3.5	Policy Paper with Proposed Action Plan and Framework for Recording and Data Management System	International Food Safety Expert (Livestock Value Chains) Dr. John Woodford International Expert (Database & Information Management Systems) Dr. James Hanks	September 2023

ANNEX 5

Proposed Structural Organisation and Functions - Directorate of Livestock Services



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