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# GAP ANALYSIS FOOD LEGISLATIVE AND REGULATORY LANDSCAPE - FOOD OF ANIMAL ORIGIN

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# **Additional Deliverable on**

## **Gap Analysis Food Legislative and Regulatory Landscape - Food of Animal Origin**

### **Work Package 74**

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## EXECUTIVE SUMMARY

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Food Safety Regulatory Landscape Study and Investment Plan builds on the findings of UNIDO's gap Analysis of legal and policy framework in the livestock sector in Bangladesh. The gap analysis found that while there were sufficient legislative instruments mandating competent authorities in regulating food safety, that there is a need to clarify the way certain legislations interact, in areas of shared responsibility, to avoid duplication of enforcement, remove ambiguity of responsibility and provide clarity to food business operators along the food chain.

This study offers a direction to act on the recommendations stemming from the gap analysis such that they are incorporated in a framework of food safety legislative and regulatory modernization, that strengthens the oversight on food of animal origin in Bangladesh.

A key element in developing this framework, is the adoption of standards and the application of risk-based food safety management measures, supported by enhanced testing capacity.

Greater coordination of interventions of the competent authorities, each within its mandate is warranted, with the aim to maximize resource utilisation, reduce duplication and clarify responsibilities.

The role of food business operators in the food safety infrastructural framework is identified with focus on the development of guidelines and codes of practice, aligned with the strengthened food regulatory policy and institutional framework. The scope of this will extend along supply chains and include all inputs including animal remedies and veterinary medicines.

Finally ensuring effective collaboration and communication amongst all stakeholders is recognised as a key success factor in achieving transformational change in the food safety control system in Bangladesh. Many of the actions outlined can be undertaken relatively quickly through changes in internal processes, while others will require investment and a longer lead time to their implementation and are set out in the "Food Safety Regulatory Investment Prioritisation Plan".

## CONTEXT

The Livestock and Dairy Development Project (LDDP) is a World Bank funded initiative amounting to \$578.66 Million USD, with the overall objective to promote productivity, growth, enhance market access, and improve risk management among smallholder farmers and agro entrepreneurs in Bangladesh. The project development objective is to contribute to productivity improvement, market access, and resilience of smallholder farmers and agro entrepreneurs operating in selected livestock value chains in target areas.

UNIDO is contributing to two components of the LDDP: namely, improved climate smart production practices by addressing the aspect of health in animal production, and food safety and public health by addressing food safety and quality assurance.

In July 2022, UNIDO completed a study offering a gap analysis of legal and policy framework in the livestock sector in Bangladesh and submitted to LDDP. The analysis focussed primarily on mapping the food safety regulatory functions, with the identification of the relevant competent authorities and associated legislative and regulatory provisions under which they operate and from which they obtain their authority of intervention. The main findings of the assessment were that existing primary legislation provides sufficient mandate for regulatory agencies to perform most regulatory functions related to the safety and quality of foods of animal origin. Therefore, changes in primary legislation were not warranted. Most gaps and areas of enhancements relate to the way these competent authorities operationalize their food safety regulatory functions granted to them by the relevant legislation and the way the delivery of these functions is coordinated amongst the various competent authorities.

UNIDO was invited to develop a Food Safety Regulatory Landscape Study and Investment Plan, building on the findings of this Gap Assessment, for use by the relevant competent authorities to address the limitations identified. The plan would be used to assist in prioritising investments in a Food Safety Regulatory Investment Prioritisation Plan but would not include costing estimates at this stage. The plan will specify investments in the regulatory system and sector specific initiatives but within the context of the production of foods of animal origin.

## **OBJECTIVES OF THE DOCUMENT**

Beyond the Food Safety Regulatory Investment Prioritisation Plan referred to above, it was identified that the recommendations stemming from UNIDO's gap analysis of legal and policy framework in the livestock sector were to be incorporated in a framework of food safety legislative and regulatory modernization, that strengthens the oversight on food of animal origin in Bangladesh.

Greater coordination of interventions of the competent authorities, each within its mandate is warranted, with the aim to maximize resource utilisation, reduce duplication and clarify responsibilities.

It is also important that the enhancement of performance covers food business operators, which should align their food safety practices with the projected regulatory requirements, by adopting the relevant updated guidelines and codes of practice. This alignment extends to consideration of supporting regulatory infrastructure including laboratory facilities, data management and enhanced controls on all inputs along the food chain.

## **SUMMARY OF FINDINGS OF THE GAP ASSESSMENT**

The 2022 gap analysis of legal and policy framework in the livestock sector in Bangladesh aimed to identify and analyse gaps in the coverage of food safety regulatory oversight. The analysis did

not include the review nor the qualification of the level of performance of the food regulatory functions covered.

This study did not identify a regulatory function, lacking empowerment through a legislative mandate but did identify a need to clarify the way certain legislations interact, in areas of shared responsibility. This particularly applies to the authority granted to the Bangladesh Food Safety Authority (BFSA), whose act does not repeal other food legislation and specifies the mandate of the organization to “support” the fulfilment of some food regulatory functions, currently exercised by other food safety competent authorities in the country.

The gap analysis identified limited effectiveness of coordination mechanisms involving the key competent authorities for the purpose of clarifying the shared responsibilities, coordinating interventions, and establishing common priorities of work. This is necessary to avoid possible duplication of functions and resolve a lack of clarity for regulated parties as to the requirements to be fulfilled. In addressing these ambiguities, it is possible to improve efficiency of operation and help resolve resource shortcomings.

The Study acknowledged the existence of Food Safety Advisory Councils and Coordination Committees mandated by legislation. But these committees comprised of representation at the highest official level, are limited in their effectiveness to support operational collaboration between food safety competent authorities. Establishing more effective operational food safety coordination mechanisms gathering the key competent authorities can play an important role in clarifying shared responsibilities, coordinating interventions and establishing common priorities of work, to facilitate exercising food regulatory functions.

Moreover, such an approach should consider how organizations responsible for research and data collection interact with food regulators and decision-makers to ensure data is used effectively for regulatory decisions and to inform policy making.

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## **STRENGTHENING FOOD SAFETY REGULATORY FUNCTIONS FOR FOOD OF ANIMAL ORIGIN**

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### **1. Strengthening the Food Regulatory Policy and Institutional Framework for Food of animal origin**

#### **1.1 Policy, Legislative and Regulatory framework**

The primary objective of the investment plan is to ensure that food safety regulatory functions are anchored in a robust food legislative and regulatory backbone.

The gap analysis identified that the limitations encountered were not associated with gaps in empowerment of food competent authorities, rather in the way these regulators delivered their mandate, with the need to improve efficiencies of food safety management practices targeting foods of animal origin from farm to consumers and through the adoption of a risk-based approach prioritising risk management actions.

It will be important that competent authorities such as the **DLS use the regulation-making authorities** provided by the Acts they administer, to develop technical regulations, rules and guidelines supporting food safety management of primary production of food of animal origin.

BSTI would need to follow a similar approach for processed foods of the same category.

**Management of inputs** with food safety significance such as the **use of veterinary substances** and of **chemicals required at various stages of production** e.g., carcass rinses, cleansers of food preparation surfaces will also need to be supported by regulatory requirements



underpinned by the assessment of and efficacy of these substances. The same would apply to disruptive interventions meant to inhibit or prevent microbial growth such as food irradiation or high-pressure processing.

**Clarity in the regulatory status of these products and processes will offer the guidance needed to actors of the food production sector as well as the predictability of the food regulatory framework.**

A clear distribution of the roles and responsibilities between food competent authorities will also need to be anchored in regulatory policy documents, endorsed at the Ministerial level, clarifying the roles of:

- DLS: as the food safety regulator for primary production
- BSTI: as the regulator for processed foods
- BFSA: as the agency mandated to provide scientific support to the overall decision-making process.

While the gap analysis carried out through this study did not identify the need to develop new legislation, should there be a window for a legislative update, the clarification of roles and responsibilities and prevention of overlap and duplication of functions would benefit from being enshrined in legislation.

Therefore, the development of the policy documents supporting such clarification would need to be included in the proposed investment plan.

## **1.2 Institutional Enhancements**

It is important that food competent authorities with oversight on food of animal origin operationalize their food regulatory mandates, accounting for the shared responsibilities between them and with the consideration of the need to rely upon science-based decisions underpinned by food risk analysis.

As a result, the following recommendations are identified:

- 1.2.1** Create a collaborative mechanism between DLS, BSTI and BFSA to support the development of scientific assessments by BFSA, upon request from DLS and BSTI (as may be relevant) to substantiate the proposed technical regulations, requirements and standards developed by the latter organization as part of their respective food regulatory mandate.
- 1.2.2** Improve the structural organisation and institutional management of the Department of Livestock Services (DLS) to allow effective implementation of a food safety management system along each of the major livestock product value chains from farm to fork.

- 1.2.3** Review and revise the existing regulations to identify priorities of interventions with rule making or regulatory development.
- 1.2.4** Invest in the development of a food safety inspectorate, primarily within DLS with collaborations with partner regulators; Develop and implement a risk-based inspection system for food products of animal origin.
- 1.2.5** Improve collaboration and coordination of operations between the different regulatory agencies to ensure synergy in the effective regulation of veterinary medicines and biologicals, including enhanced awareness, surveillance and risk management of veterinary drug and chemical residues, AMU (and AMR).
- 1.2.6** Establish a formal process of communication and coordination between agencies with a specific scope to manage the shared responsibilities in veterinary medicines destined to food producing animals.
- 1.2.7** Develop an interagency process led by BFSA, for food safety incident management, food recall, communications, and remedial actions, associated with food of animal origin.

These actions will contribute to clarifying roles and responsibilities and to removing the ambiguities in the scope, mandate and responsibilities of all parties with a food safety mandate applicable to food of animal origin in Bangladesh.

## **2. Delivery of Food Safety Regulatory Functions**

### **2.1 Standard setting**

The improvement of standards of hygiene during the production, transportation, processing, and distribution of animal products must be based on the application of risk analysis. Operationalizing the Standard Setting function for food regulators with oversight on food of animal origin means the development of the rules and requirements of operations, that need to be fulfilled by Food Business Operators (FBOs) to ensure the safety of products, i.e., protect consumers' health and enable fair practices in the food trade (support a predictable transparent and equitable food regulatory environment). These rules need to align with international standards and requirements and be based on food risk analysis and striving towards harmonization or convergence of food regulatory measures. The Gap analysis led to identify the following areas of focus and investment:

- 2.1.1** A National food regulatory committee should be established with the aim to plan, prioritize, and implement the collaborative food regulatory development for food of animal origin. This committee should select a pilot project for regulation development and standard setting, with the example of approval of veterinary substances destined to food producing animals and the derivation of the associated Maximum Residue Limits (MRLs).

- 2. 1. 2 A National WOH (World Organisation for Animal Health) Committee should be resourced to provide coordination among relevant regulatory agencies and comprised of representatives of the relevant authorities with responsibility for food safety. This should be established by DLS and include facility for engagement with key stakeholders representing producer and industry representatives.
- 2. 1. 3 Budgetary provision should be provided to support participation by national experts in relevant Codex and WOH committees including Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF), Codex Committee on Food Hygiene (CCFH) and Codex Committee on Methods of Analysis and Sampling (CCMAS).
- 2. 1. 4 A National Codex Coordination Committee should be re-established to provide coordination among relevant regulatory agencies and comprised of representatives of the relevant authorities with responsibility for food safety with the opportunity to engage with key stakeholders representing producer and industry representatives.

## 2. 2 Compliance and Enforcement

Effective enforcement of food safety controls along the food chain requires a coordinated interagency approach based on consistent interpretation of legislation, and regulatory provisions. Developing an effective compliance and enforcement policy, making a strong emphasis on compliance promotion, supported by consistent, risk-based and a predictable enforcement environment, should be the guiding principle towards achieving this goal and pursuing the following objectives

- 2. 2. 1 **Objective 1:** A Compliance Promotion Strategy is to accompany every new regulatory measure enacted by the DLS

The compliance promotion strategy should offer a plan for awareness raising and dissemination of the new requirements being imposed on FBOs. It should encompass activities of compliance promotion upon the roll out the new regulatory requirements, prior to the coming into force date. Other compliance promotion initiatives should be envisaged after the coming into force, following an incremental approach (see Objective 3). The strategy should identify the resources needed to be developed and deployed for this purpose. It should also account for the need to attend to special cases of operators, either as a result of their size or their lower level of readiness to achieve the projected requirements.

- 2. 2. 2 **Objective 2:** Food Business Operators (FBOs) should be supplied with guidance, training, and tools in conjunction with the promulgation of any new regulatory requirement:

It is indispensable to plan the various resources that would be required to support the development and dissemination of guidance to FBOs. Where needed, investment should be envisaged to accompany the FBOs in upgrading their infrastructure, personnel competencies, and operations to support their ability to meet the new requirements.

2. 2. 3 **Objective 3:** Compliance with new regulatory requirements is to be achieved following an incremental approach with the establishment and monitoring of the relevant performance indicators:

A multi-stage compliance promotion approach (figure 1) should be designed and followed, with the aim to identify incremental steps of achieving such compliance. Generally, **a first phase should be developed prior to the coming into force** of the newly imposed requirements. This is meant to enable the operators to prepare and adapt for the new rules. The incremental approach will still be followed, **after the coming into force**, through the observance of what is known as the VADE Approach, adopted by New Zealand regulators<sup>1</sup> : Voluntary, Assisted, Directed and Enforced (Compliance). This incremental approach will also encompass a risk-based lens in its implementation with a stronger level of interventions planned with those operators unable or unwilling to achieve compliance despite all efforts deployed to bring them to such compliance. These stages are to be adapted to the nature of the requirements being imposed and the level of readiness of the sector to follow and achieve the new requirements. Performance indicators should be developed to support moving from one stage to another, for the majority of operators targeted in a given production sector, subject to regulatory oversight.



Compliance Promotion at the Initial Stages of Roll out of the Regulatory requirements - **Before a Coming into Force Date**



Compliance Promotion Applied **during the Coming into Force Period:** Application of VADE Approach -

Figure 1: Multi-stage Compliance Promotion Approach Prior to and After Coming into Force of New regulatory Requirements.

2. 2. 4 **Objective 4:** Non-compliance incidents are to be addressed following a risk-based approach and using a documented guidance approach.

Another key pillar of the compliance and enforcement strategy is to enable a systematic management of non-compliance incidents, when identified. A risk-based approach is to be followed in these situations, meaning that the enforcement measure to be adopted is designed in a manner that is commensurate with the level of risk to be expected / anticipated as a result of the situation of non-compliance. The enforcement approach may require the reliance on a rapid risk assessment to characterize and document the risk that may be associated with the non-compliance incident.

1 Achieving Compliance: A Guide for Compliance Agencies in New-Zealand, June 2011, Accessed through : <https://www.publicservice.govt.nz/assets/Legacy/resources/MPI-PIF-final-copy-29-March.pdf>

### 2.2.5 **Objective 5:** Enforcement measures are decided in an independent and transparent manner

Ensuring the predictability of the food regulatory environment should be supported by the reliance upon a systematic approach related to enforcement measures and possible sanctions stemming from non-compliance incidents, where such enforcement is warranted. Ensuring that the decision-making process is supported by clear procedures and mapped enforcement options will support the independence of such decisions and will limit the subjective and personal influence that may be encountered in exercising such regulatory functions. Beyond the development of an “**enforcement map**” in the form of pre-identified measures, in relation with projected situations of non-compliance, it may also be advised to have the enforcement decision made by a central “**Incident Management Unit**” or **IMU** that is independent from the officer inspecting the food production premises. Such independence may also serve as a prevention mechanism from possible deviations that could be observed by some enforcement officers including corruption practices where relevant.

This IMU would be established within DLS and would be mirrored in BSTI for processed foods.

## 2.3 Testing capacities

The gap assessment carried out which led to the development of this Study, identified that there were important investments made recently in Bangladesh in favour of enhancing the food safety testing capacity, directed to food of animal origin and associated inputs (i.e. veterinary additives and applications).

Illustration of these investments were showcased with the recent operation of the DLS Quality Control Laboratory in Savar, with an important mobilization of resources (infrastructure and equipment) dedicated to serve the production sector and food regulatory functions associated with food of animal origin in Bangladesh.

The laboratory capacity complemented existing research and monitoring operations supported by the Bangladesh Livestock Research Institute (BLRI) and the Fisheries laboratories.

More focus needs however to be devoted to the competency of these laboratories in generating reliable data and in covering the various food safety hazards known to occur in food of animal origin, including the requirements to control the safety and authenticity of inputs (feed, veterinary medicines, pesticides).

Investments in training, capacity building and support to inter-laboratory validation exercises, along with participation in proficiency testing programs by these laboratories need to be addressed to support ensuring and/or maintaining their 17025 Accreditation.

Similarly, investments need to be made to ensure that planned monitoring programs be effectively planned and implemented, in particular residue monitoring programs, as well as monitoring for pathogens occurrence and prevalence of anti-microbial resistance.

Testing results, generated as part of laboratory operations need to be captured and

effectively utilized to support decision-making.

Investments are therefore needed to enable data collection and the creation of a repository of such data, in a possible database for food contaminant monitoring.

These data need also to be subjected to risk assessments which should inform decision-making.

The development or updates to existing food regulatory governance structures where laboratory data and results are consistently reported and used should be considered as part of the planned investments.

## **STRENGTHENING FOOD SAFETY COMPLIANCE BY FOOD BUSINESS OPERATORS FOR FOOD OF ANIMAL ORIGIN**

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### **1. Food Business Operators**

Food Business Operators (FBO's) are responsible for producing, distributing, and putting safe foods on the market. How regulatory requirements are interpreted and achieved is based not just on the actions of the competent authorities but on how these regulatory provisions are reflected within their internal risk management processes. While this food safety landscape study sets out measures that can strengthen the food safety regulatory functions of competent authorities, it also recognises the importance of a parallel process in developing food safety compliance for food business operators.

- a) **Development of Codes of Hygienic Practice for Milk and Milk Products**  
The dairy sector in Bangladesh is characterised by a fragmented supply chain with numerous links between farmer producers and milk processors. While BSTI have a draft standard for raw milk quality and consistency, it has yet to be published<sup>2</sup>. The Codex Code of Hygienic Practice for Milk and Milk Products provides a basis for the development of a stakeholder led Code of Practice for milk production in Bangladesh. The Code will draw on resources including UNIDO's Guideline for Trainers or Practitioners in the Dairy Sector (2018) and The dairy and beef value chain in Bangladesh (2019).
- b) **Development of Codes of Hygienic Practice for Meat Products**  
The beef sector in Bangladesh is characterised by the sale of freshly slaughtered meat in local markets with a very small percentage of the national slaughter being undertaken in licensed abattoirs. Reflecting the comments from meat processors to UNIDO in January and March, where the desire was for every animal slaughtered to be subject to veterinary inspection, there is a demand from the sector for greater scrutiny and for better hygienic practices to be adopted. The Codex Code of Hygienic Practice for Meat offers a template for

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2 [Draft Pasteurized milk.pdf \(portal.gov.bd\)](#)

stakeholder led development of guidelines with additional resources available including an analysis of the beef value chain in Bangladesh by Wageningen University and Research.

c) Development of Supply Chain Traceability

The implementation of Food Safety controls along the domestic supply chain is essential to protect consumer safety by differentiating foods produced with high food safety criteria from those of unknown origin or quality. Traceability enables this differentiation. Codex Alimentarius defines traceability as “the ability to follow the movement of a food through specified stage(s) of production, processing and distribution”.

Traceability is applied for a variety of business purposes, including food safety and quality assurance; market access; product recall and market withdrawal; consumer protection through public health trace-back; regulatory compliance; process, stock and order management; each of which are key elements in reducing food waste.

Traceability requires the unique identification of food business operators, products and quality information and can comprise of different approaches including registration systems, certification and / or quality assurance schemes. The objective of traceability systems is to ensure that there are both upstream and downstream linkages for every factor of production, data and product which are visible and credible to the relevant actors.

d) Control of Inputs, Substances and Animal Remedies

Quality and authenticity of the factors of production are essential factors in producing safe food. The availability and controlled use of approved Inputs, Substances and Animal Remedies along the food supply chain is a priority in producing safe food. This begins at the farm level with controls on the supply and use of approved animal remedies and continues along the food chain with the controlled use of approved additives, biocides and cleaning agents. All products used in the production and processing of foodstuffs should be considered to be controlled substances as their correct use is essential to avoid unintended consequences for users and consumers. The term-controlled substances should not be considered as a means of introducing complex or non-value adding cost to their availability but a term that describes the need for considered use of these products at all levels of production.

## **FOOD SAFETY REGULATORY INVESTMENT PLAN**

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### **Context**

As part of UNIDO’s contribution to the Livestock and Dairy Development Project (LDDP), World Bank initiative, it developed a number of working documents on how to achieve improved climate smart production practices by addressing the aspect of health in animal production, and food safety and public health by addressing food safety and quality assurance.

In July 2022, UNIDO produced a study offering a Gap Analysis of the Food Legislative and

Regulatory Landscape in Bangladesh<sup>3</sup> which found that gaps and areas of enhancements related not to deficits in legislation but to the way regulatory functions are operationalized by the different competent authorities.

In response to these findings, UNIDO initiated a series of reports commencing with a **Proposed Livestock Development Policy Framework and Food Safety of Animal Products Policy**. From this, four specific documents were drafted which presented a series of recommendations for specific actions to achieve the policy objectives outlined in the policy framework. The relevant documents are:

**Policy paper on Operationalization of Department of Livestock Services' Regulatory Function and Coordination Mechanisms for Food of Animal Origin**

**Antimicrobial Resistance Containment Policy in Animals and Foods of Animal Origin in Bangladesh**

**AMR Surveillance and Monitoring Framework in the Animal Health Sector in Bangladesh**

The Food Safety Regulatory Investment Plan draws on the recommendations from these reports, combining them into four primary areas for action, namely infrastructural, enforcement capability, regulatory effectiveness, and the food safety capacity of food business operators. The areas identified for prioritisation in this plan include those where additional budgetary resources may be required to develop frameworks, infrastructure, and processes that

can strengthen the functioning and operation of the existing food safety infrastructure in Bangladesh.

This Plan is developed to support engagement with competent authorities, stakeholders, and potential funders on potential areas for investment, and to provide context for financial feasibility studies in the identified investment areas. The four primary areas identified for investment are categorised in a way that can optimise investment, avoid duplication, and maximise impact across the food safety regulatory environment.

## Food Safety Regulatory Priorities

There are four main areas identified for action, namely infrastructural, enforcement capability, regulatory effectiveness, and food safety capacity of food business operators. While categorised separately, elements of some of the priorities are linked to priorities within different categories. For example, the development of a veterinary medicines database is categorised as an infrastructural investment, while training of those who will use it in the field is categorised under enforcement capability.

Actions listed in this report relate to specific recommendations contained within the four referenced reports, which provide the context, detail and objective for the recommendations and are not repeated within this Prioritisation Plan.

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<sup>3</sup> This study followed the January 2022 Study by UNIDO “Gap Analysis to assess capacity of DLS and other Competent Authorities to perform regulatory functions related to Food Safety of Products of Animal Origin”



## 1. Developing a Food Safety Infrastructure

1.1 Develop a national database of Food Business Operators, initially identifying area of activity e.g., dairy, beef or poultry. This database must facilitate future development to enable registered FBO's, to list their registered suppliers including farmers, collection hubs and other suppliers of foods, ingredients, and their components. Later iterations of this system should facilitate a system of developing a unique herd identification number for all farmers, and at a later stage of development, the incorporation of individual animal identification numbers.

1.2 Develop a national database to record national food and feed incidents of identified risk to public health are identified, including food and feed contaminants and adulterants. This database must in the first instance must have controlled data entry by agreed competent authorities and allow for access by registered Food Business Operators to view and notify of incidents, contaminants, and adulterants.

1.3 Develop a database for recording of all registered agro, food and feed products used in the production and processing of food and feedstuffs. Management of this data must rest with the competent authorities with responsibility for approval and registration of specific products. This database must be accessible by enforcement agencies, veterinarians and livestock professionals.

1.4 Create a virtual platform to enable collaboration between regulatory agencies engaged in the regulation of veterinary medicines and biologicals, including enhanced awareness, surveillance and risk management of veterinary drug and chemical residues, AMU (and AMR).

1.5 Develop an investment plan for the development of a national laboratory infrastructure that supports competent authorities in ensuring compliance with food safety requirements for foods of animal origin. This must ensure that adequately equipped laboratory services are available to support analysis at all stages of the supply chain.

1.6 Develop a national laboratory proficiency programme that can support inter-laboratory validation, assist in capacity building and support, initiate proficiency testing programs and promote accreditation to 17025.

## 2. Building Enforcement Capability

2.1 Develop a Food Safety Inspectorate, within DLS with collaboration with other competent authorities engaged in the regulation of foods of animal origin. This must be adequately resourced with a dedicated team led by senior management and provided with the resources necessary to implement a risk-based inspection system for food products of animal origin.

2.2 Develop a formal interagency process with responsibility to manage food, feed and animal health incidents at regional and national level. This process must involve the existing Food Safety Inspectorate but must have access to its own resources to communicate and respond quickly to incidents.

2.3 Develop written procedures, guidelines, and metrics specific to the interpretation and

enforcement of official controls within competent authorities.

2. 4 Initiate a bespoke training programme for all enforcement personnel across competent authorities to ensure food control officials are properly educated in the delivery of official food controls.

2. 5 Develop and implement a human resource performance and talent management system for staff within competent authorities engaged in food regulatory roles. This should be benchmarked against international best practice.

### 3. Strengthening Regulatory Effectiveness

3. 1 Provide resources for a National Codex Coordination Committee to enable coordination and sharing of expertise in food safety of foods of animal origin, among relevant regulatory agencies, subject matter experts and relevant stakeholders and to support participation by national experts in relevant Codex Committees.

3. 2 Provide resources for a National World Organisation for Animal Health (WOAH) Committee to enable coordination and sharing of expertise in food safety of foods of animal origin, among relevant regulatory agencies, subject matter experts and relevant stakeholders and to support participation by national experts in relevant WOAH Committees.

3. 3 Invest in the development of resources, guidance and training for members of competent authorities that are engaged in enforcement, policy development and the drafting of regulations, to assist them in areas such as the application of international standards when evaluating compliance, enforcement policy, and administrative procedures in official controls and compliance.

3. 4 Develop a resource that can provide ongoing training of individuals from competent authorities engaged in enforcement activities that that focuses on proficiencies in sampling, data recording, data management, communication and investigative assessment.

3. 5 Provide resources for reviewing/updating existing regulations for compliance and evaluated for effectiveness and accomplishable on a regular basis by the competent authorities.

### 4. Food Safety Capacity Building of Food Business Operators

4.1 Create a forum for the development of Guidelines and Codes of Practice for Food Business Operators (FBOs) on food safety requirements in Bangladesh. These should be developed through facilitated stakeholder consultations with specific focus on

- Code of Practice for milk production in Bangladesh
- Code of Practice for meat production in Bangladesh
- Good Animal Husbandry Practices
- Good Management Practices
- Regulatory Requirements for Food Business Operator

4.2 Develop a stakeholder engagement resource for the promotion, communication, and adoption of the guidelines and codes of practice amongst Food Business Operators in Bangladesh. Recognizing the scale of the sector in Bangladesh, a number of these facilities will be required to ensure sufficient engagement and input from stakeholders across the country.

4.3 Develop digital solution for Food Business Operators to access the National Databases for Food Business Operators, registered products, and food and feed incidents which will enable them to record animal movement, authorization status of inputs and awareness of food safety incidents.

## **COMMUNICATION, PARTNERSHIP AND COORDINATION**

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The food safety regulatory landscape study purposes to achieve structural transformation in the food safety regulatory environment in Bangladesh through developing a framework for greater collaboration and partnership between individual competent authorities, and between competent authorities and food business operators. As identified within the gap analysis, while many national committees exist by merit of existing legislation, it has not provided the level of collaboration between agencies as envisaged within the initial regulatory texts. However, it must be stressed that in seeking greater collaboration between regulatory agencies, the purpose of existing steering and advisory committees should not be undermined. Committees comprised of senior representatives across government agencies fulfil a critical function providing strategic direction to the sector and provide a crucial linkage between public expenditure, accountability, and governance. The recommended approach calls for more operational coordination and management committees that are set at the operational level and that could report to the high level committees.

This study has focused on the food safety regulatory landscape as it pertains to competent authorities and food business operators, identifying areas for improvement and investment. However, it is important that consumers are recognised as a crucial element in a food safety system. While the primary objective of a robust food safety system is to protect the consumer, it is also the case that the consumer provides the strongest incentive for providing high quality, safe food.

Consumers demand drives the market for food. While the cost of food is a crucial factor in consumers purchasing decision, and quality criteria can be subjective, food safety is the single most important criteria for consumers within their purchasing criteria. Most consumers take food safety for granted or as a given within the foods that they purchase. For food business operators, how they can communicate the food safety credentials of their foods remains a challenge. A common statement by FBO's in Bangladesh is that many consumers do not differentiate on food safety when food is procured for formal and informal marketplaces. Accordingly, to achieve a greater market demand for foods produced through a strengthened food safety infrastructure, it will be necessary to create a market differentiation for foods produced through improved food safety processes. The role of the consumer is crucial in this, and consideration must be given to consumer education programmes that inform them of how

the food safety regulatory environment is changing and more so how and where such foods can be purchased.

## **THE NEXT STEPS**

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The recommended actions within this food safety regulatory landscape study are incorporated in the “Food Safety Regulatory Investment Prioritisation Plan” which sets out an investment framework for the actions identified that will require additional resources.

A number of actions identified within this report may be acted upon without additional resources and can be addressed within existing frameworks. These actions can be implemented without delay and will provide an important framework which will prepare for subsequent investment in the areas identified.



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