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KIAMBU COUNTY FOOD SAFETY POLICY

2020

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Foreword

Food safety needs to be addressed by protecting the food supply from microbial, chemical and physical hazards that may occur during all stages of food production, including growing, harvesting, processing, transporting, distributing, retailing, storing and consumption. Well-developed food safety systems contribute to improved public health, increased access to food trade, increased food security and the protection of the environment. Access to safe food is a fundamental right as prescribed in Article 43 as read with Article 46 of the Constitution of Kenya 2010. The formulation of the Kiambu County Food Safety Policy 2020 shall strengthen the Food Safety Control system in Kiambu County.

Components of Food Safety Control system are being managed by different stakeholders in a random manner. A county depending on both home-grown and imported food with fast developing agriculture sector is greatly in need of a systematic approach to manage Food Safety Control.

The scope of this policy covers all aspects of county, national, regional, and international practices, principles, guidelines, standards and agreements governing food safety systems. The policy includes all public and private entities involved in the technical, operational and management aspects of food safety and control systems in Kiambu County.

In order to achieve integrated food safety and control management, the policy is carefully formulated taking into account the pillars of Food Safety control Management namely: Food Law, Regulation and standards, Inspection Services, Laboratory services, Monitoring and Training.

This policy shall enable the successful improvement and implementation of food safety related issues, including import, export and locally produced food in the County. Furthermore, I am confident that this policy and its implementation shall improve the food safety which shall contribute to the health and well-being of our people.

This policy has been developed with collaboration and consultative effort by national stakeholders including governmental and non-governmental stakeholders. The formulation of policy was generously funded by MESSPT I would like to take this opportunity to express my sincere gratitude to MESSPT for their continuous support. My appreciation also goes to all stakeholders for their contribution during consultative process.

Definition of Terms

<i>Contaminant</i>	Any biological or chemical agent, foreign material, or other substances not intentionally added to food that may compromise food safety of suitability
<i>Feed</i>	Any single or multiple material, whether processed, semi processed or raw, which is intended to be fed directly to food producing animals.
<i>Food</i>	Means any substance, whether processed, semi processed or raw, which is intended for human consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of food but does not include cosmetics or tobacco or substances used only as drugs.

<i>Food Hygiene</i>	All condition and measures necessary to ensure the safety and suitability of food at all stages of the food chain.
<i>Food business operator</i>	A food business operator is as any undertaking, whether private or public, for profit or not, carrying out any of the activities related to any stage of manufacture, processing, packaging, storage, transportation, distribution of food, imports and including food services, sale of food or food ingredients
<i>Food Safety</i>	All measures to ensure that food will not cause harm to the consumer when it is prepared and/ or eaten according to its intended use.
<i>Foodborne disease</i>	A general term used to describe any diseases or illness caused by eating contaminated food or drink. Traditionally referred to as food poisoning.
<i>Hazard</i>	Anything microbiological, chemical or physical that can harm to a consumer.
<i>Risk</i>	Is the probability of an illness as a result of a hazard occurring in a food. Although a pathogen may represent a serious hazard, if it is unlikely to occur in a food (or at low numbers), then the risk to the consumers is very small. The risk to consumers is also influenced by the dose, so the more consumed the more likelihood of a health hazard.
<i>Street Vended-food/street food</i>	Food prepared and/or sold by vendors in streets and other public places for immediate consumption or consumption at a later time without further processing or preparation. This definition includes fresh fruits and vegetables which are sold outside authorized markets for immediate consumption.

Acronyms and Abbreviations

HCD- Horticultural Crops Directorate

KCFSTC-Kiambu County Food Safety Technical Committee

KDB-Kenya Dairy Board

KEBS- Kenya Bureau of Standards

KEPHIS-Kenya Plant Health Inspectorate Services

FBO-Food business operator

WARUHIU ATC-Waruhiu Agriculture Training Centre

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1.0 BACKGROUND TO THE POLICY

Food safety is crucial for human health and development and poverty reduction. It includes all measures intended to protect human health. Food is considered to be safe if there is reasonable demonstrated certainty that no harm will result from its consumption under anticipated conditions of use.

Kenya lacks a defined and published policy on food safety. However, there exists food laws, both at national and international level. The national food safety is managed by various statutory government agencies. They include the KDA, KEPHIS, KEBS, and HCD among others. They aim at promoting public health, protecting the consumers against health hazards and enhancing economic development. They also sensitize and implement codes of hygiene and agriculture practices by stakeholders throughout the food chain.

Food safety is being kept as low priority due to the lack of proper regulatory framework and inadequate human, technical and financial resources. The national food control system is fragmented and roles and responsibilities of various stakeholders are not well defined and their functions overlap. Under such circumstances, Kiambu County may become vulnerable to consumption of sub-standard, low quality and contaminated food and food products which may have negative impact on health, environment and well-being of its people.

The overall food safety situation, enforcement of regulations and national capacity to address emerging food safety issues can only be strengthened by a specific food safety policy and better coordination among major stakeholders. Therefore, formulation of a food safety policy is important for policy direction, resource mobilization and better coordination among stakeholders.

This policy aims at highlighting the roles played by various stakeholders, the gaps and challenges as well as the mechanisms to curb them. It shall also ensure that safe food is the result of adequate control at all stages of the supply chain rather than corrective action taken later in the process.

1.1 SITUATION ANALYSIS

The situation in Kiambu is that there is inadequate food safety interventions from production level up to consumption. This poses various challenges that hinder safe production and trade facilitation. There is uncoordinated food safety and control activities, poor harmonization of standards and regulations, inadequate capacity building and consumer awareness in food safety principles and lack of consumer awareness programmes.

In addition, the County lacks a digitalized database on the certified service providers and services, FBOs and producer organization, accredited labs and rapid testing kits and mobile testing units as well as a traceability and call back system.

The poor infrastructure delays transportation and compromises storage of perishables. There is influx of food products from other counties whose quality is not ascertained. Food handlers at farm level lack targeted training. The food grade equipment is costly. The food markets are poorly organized. Lastly but not the least, the whole system perceives food safety as the sole responsibility of the regulator.

1.2 Processes and achievements

Kiambu County has formed a food safety committee known as KCFSTC and sub committees for purposes of coordination and harmonization of approach in addressing food safety challenges in the County. This is already achieved. The committee has convened through Virtual meetings and workshops with key stakeholder to jumpstart the process of development of KCFS draft policy.

2.0 THE COUNTY FOOD SAFETY POLICY

Statements of vision, mission and policy objectives

2.1 STATEMENT OF VISION

To be the leading county in food safety systems, free of food borne illnesses/diseases

Mission

Promotion of safe wholesome food towards a healthy population in Kiambu County

2.2 POLICY OBJECTIVES

Overall Objective

The overall objective of this policy is to establish a framework that will guide safe production, value addition, handling, storage and sale of food in Kiambu County.

Specific Objectives

- i. To promote safe production, handling, processing, transportation and storage of food
- ii. FBOs to take responsibility in ensuring food safety
- iii. To sensitize and create awareness on food safety amongst stakeholders.
- iv. To enhance collaboration and coordination among different stakeholders and government agencies.
- v. To establish a system for uniform inspections throughout the county
- vi. Develop and enforce legislations to promote food safety
- vii. Strengthen food safety and quality control and monitoring systems
- viii. Promote education and research on food safety
- ix. FBOs establish a traceability system
- x. Develop systematic and non-systematic education on food safety for personnel involved in food safety activities

2.3 KEY PRINCIPLES

This policy is guided by the following principles

- i. It is the sole responsibility of all FBO's to comply with regulation
- ii. The control shall be preventive
- iii. FBOs approval/registration
- iv. The inspection is the pillar in the control with FBO's

- v. The analytical control shall be a verification of whether the FBO's system is effectively implemented
- vi. The controls shall be both risk based and regular
- vii. Control should seek the source
- viii. The control shall use the sanctions necessary to ensure that the regulations are observed
- ix. The effect of the control shall be uniform, both geographically and within the branches; meaning for example, that import and production shall have the same requirements, and that regulations shall be enforced equally throughout the county
- x. The control shall be able to document its reliability and effectiveness
- xi. Food safety programme shall be sensitive to culture/traditional/religious practices and county's context perspective while sustainable use of natural resources and environment impact are to be taken into account.
- xii. Food safety activities have to be based on continuous research programme to enable the strengthened linkage between sustainable food production, nutrition, and health.

3.0 POLICY ISSUES AND INTERVENTIONS

Policy directions

Policy Issue No. 1- Legal and Regulatory framework (Food Law and regulation)

Challenges

- Poor Coordination among implementers, regulators and enforcers – There is no existing structure to bring together the implementers and regulators
- Each regulator works independently leading to overlapping and duplication of roles resulting to conflicts among them and confusion to the FBOs
- Emerging issues such as street vended foods have not been formally recognized in the various legislative framework.
- Lack of food and feed raw regulation

Policy Intervention

- Establishment of a county food safety coordination committee(CFSCC)
- Develop and Review laws and regulations on food safety to support the control system.
- Establish designated well equipped food market within the County
- Develop a regulatory framework for management of street vended foods

Policy Issue No. 2 – Information, Education and Communication

Challenges

- Inadequate public awareness on food safety
- Lack of County FBO platform
- Lack of registered and Unaccredited food safety training Organisations/colleges

- Lack of real time food safety data management information system.
- Inadequate research/studies to inform policy and decision making.

Policy Intervention

- Strengthen public awareness, through county government advocacy, mainstream and social media.
- Establish platforms for FBOs for coordination, linkages and information sharing
- Enhanced collaboration between stakeholders in food safety and sharing information on food safety incidences.
- Establish and train County food safety committee and build their capacity for improved coordination
- Establish a county food safety database.
- Build capacity of staff and farmers through recognized institutions such ATVETs.
- Involve special interest groups in the dissemination process (e.g. political class)

Policy Issue No. 3 –Traceability

Challenges

- Lack of clear food recall plans
- Lack of elaborate traceability systems in the county.
- Contaminated food finding its way back into food chain
- Inadequate capacity in management of traceability systems by actors including regulators and enforcement agencies.
- Negative attitude amongst producers/processors on traceability with fear of taxation.
- Lack of Safe disposal of contaminated product
- Influx of food and food products from other counties whose quality is not ascertained

Policy Intervention

- The County to support the FBOs to have a traceability system in place.
- Enhance inter County Food safety Committees collaborations
- FBO to have a food recall plan
- FBO to have documented procedure for handling and disposal of contaminated foods and the county to supervise and provide a site

Policy Issue No. 4 – Infrastructure and Capacity

Challenges

- Limited human resource capacity for food safety in the county.
- Inadequate numbers of recognized and accredited laboratory facilities for testing food safety samples.
- Lack of rapid field test kits for diagnostic analysis that enable timely food safety decision
- High cost of food grade equipment

- Lack of adequate storage facilities for perishable products

Policy Intervention

- To capacity-build the county staff and other key stakeholders on food safety
- Map and establish laboratories for testing of food samples both public and private and provision of mobile testing kits.
- Prioritized budgetary allocation for food safety management.
- Development of strategies for resource mobilization for food safety infrastructure development.
- County to promote and support innovation and appropriate technologies to support use of food grade equipment

Policy Issue No. 5 – Emerging and re-emerging food safety concerns

Challenges

- Inadequate capacity of implementers and regulators to conduct surveillance for foodborne diseases, contaminants and impact of food related pandemics and endemics.
- Inadequate capacity of implementers and regulators to conduct inspections for compliance.
- Lack of consumer awareness on the potential health risks posed by unhygienic food handling.

Policy Intervention

- Establish and implement a regulatory framework for management of street vended foods.
- Strengthen capacity of county food inspectors and regulators to conduct surveillance schemes in food.
- Sensitizing consumer through mainstream and social media regarding food borne diseases and contaminants.

Policy Issue No. 7 – mandates. Collaborations and capacities

Challenges

- Inadequate networking and linkages between national and county government functions relating to food safety.
- Lack of scientific data at the county level to inform on policy and decisions (both on food safety incidences and surveillance).

Policy Intervention

- Improve collaboration between national and county government with clearly defined mandates.
- Strengthen collection of scientific data on food safety that would inform policy and decision making at both county and national governments.

- Establish an institutional framework to be known as Kiambu County Food Safety Coordination Committee to enhance Coordination, Consultation and cooperation.

4.0 POLICY COORDINATION AND IMPLEMENTATION

4.1 Institutional mechanisms for achieving policy objectives

The Constitution mandates the county to licence and regulate the food safety in the County. As a result, the county has established departments of health, trade, agriculture, environment and administration to regulate and enforce the issue of food safety. The mandate is also delegated to other government bodies including but not limited to KDB, KEPHIS and KEBS. The different agencies lack a unified platform to address the food safety issues. This in turn has led to overlap of mandates and difficulties in sharing information. This has created gaps in effectively implementing and enforcing the food safety laws and regulations in place.

To address the challenges, there is a need for a multi sectoral approach towards food safety. The aim is to bring representatives of different stake holders and key players under one unified platform who shall spread the information in their different fields. This in return will ensure that the views of the stakeholders are well represented. This platform with stakeholders cutting across shall also ensure that the County Government is well versed with the emerging issues and is able to tackle them urgently and effectively.

4.2 Implementation framework

The policy proposes establishment of a unified platform which shall be known as a Kiambu County Food Safety Coordination Committee (KCFSCC).

The function of this committee shall include but not limited to:

- a) Bring all institutions and food safety actors together in a unified platform, coordinate food safety activities while safeguarding, facilitating and strengthening each actor's mandate in food safety control, this will eliminate conflicts and overlaps amongst the actors to seal the gaps and inefficiencies in the current food safety control system.
- b) Organize trainings for the stakeholders
- c) Enhance capacity building within the county
- d) Protect and promote human, plant, animal and environmental health;
- e) Facilitate the orderly development of the food industries as well as fair practices in food trade;
- f) Fulfill the International, Regional, National and County Food Safety Obligations
- g) Link both horizontally and vertically (inter-counties and nationally)
- h) Coordinate all the existing food control infrastructure and services and redefine their roles in order to eliminate areas of overlap and conflict.

The policy proposes membership as follows;

FROM THE COUNTY GOVERNMENT

- 1) A representative from the department of Health services (Public Health)
- 2) A representative from the department of Administration & Public service
- 3) A representative from the department of Water, Environment, energy & Natural resources

- 4) Five (5) representatives from the department of Agriculture, Livestock & Irrigation
- 5) A representative from the department of Trade, Tourism and Enterprise development
- 6) A representative from the office of the County Attorney
- 7) Technical, Vocational, Education Training (TVET)

FROM THE COUNTY ASSEMBLY

- 1) Chairman of the Agriculture Committee
- 2) Chairman of Health Committee

FROM THE NATIONAL GOVERNMENT-A representative from:

- 1) KEPHIS
- 2) Kenya Dairy Board
- 3) N.E.M.A
- 4) HCD
- 5) KEBS
- 6) County Commissioner

KEY STAKEHOLDERS-A representative from:

- 1) Producer organization
- 2) Consumer network
- 3) Civil society
- 4) Processors organization

Co-opted Member (as need arises)

ROLE OF FBO

- To embrace written scheduled own check programmes and submit reports to the relevant authorities
- To report any food safety incidence to regulatory authority
- To ensure that foods and food handling facilities comply with provisions
- Institute food recall and traceability processes
- Not to sell food when suspected and found unfit
- To adhere to food hygiene practices

ROLE OF REGULATORY AUTHORITIES

- To prepare legislation
- To carry out inspections
- Creating awareness on Food safety
- Conduct Food Safety Audits
- Advisory role to FBOs
- Food sampling and analysis
- To verify that legislation is met by FBO
- Conduct food surveillance activities
- To share information
- To enforce legislative provisions

4.3 Monitoring and evaluation

FBOs self-assessments Reports - develop a self-assessment checklist against which evaluation will be done, and reports generated such as Monthly, Quarterly, Annually.

Peer review/assessment- to invite fellow professionals in food safety from other organizations to review/assess progress.

Quarterly stakeholder's forum- to organize regular forums with stakeholders to communicate and discuss successes and gaps of policy implementations.

Risk based inspections – these are assessments aimed at identifying and analysing potential areas of negative impact to the implementation of the policy.

Laboratory analysis – regularly carry out the lab tests to verify the accuracy of the results and reliability of the testing equipment

Surveys- carry out random samples from various sections of the value-chain to ascertain the success of the policy implementation.

Technical Audits – using a team of professionals and pre-determined data collection instruments to carry out audits to determine the success of the policy implementation.

5.0 POLICY FUNDING MECHANISMS

This policy will be financed by the County Government of Kiambu through budgetary allocation, cost recovery mechanism, public private partnership and relevant donor funding.

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