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GRASP • PAKISTAN

**GROWTH FOR RURAL
ADVANCEMENT AND
SUSTAINABLE PROGRESS**



Capacity Assessment Report

Balochistan Food Authority

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Growth for Rural Advancement and Sustainable Progress

Capacity Assessment Report – Balochistan Food Authority

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This report has been authored by ITC's National **Consultant**, Dr. Zaffar Mehmood. The views expressed in this report are those of the author's and do not necessarily coincide with those of the International Trade Centre.

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Acronyms

BFA	Balochistan Food Authority
GRASP	Growth for Rural Advancement and Sustainable Progress
ITC	International Trade Centre
MSME	Micro, Small and Medium Enterprises
SOPs	Standard Operating Procedures
MOUs	Memorandum of Understanding
FAO	Food and Agriculture Organization
OIE	World Organization for Animal Health
WTO	World Trade Organization
MRL	Maximum residual Limit
IPO	Intellectual Property Office
KPK	Khyber Pakhtunkhwa
AJK	Azad Jammu & Kashmir
GMO	Genetically Modified Organisms
SPS	Sanitary and Phytosanitary Measures
PSQCA	Pakistan Standards and Quality Control Authority
FSSAI	Food Safety and Standards Authority of India
GLP	Good Lab Practices
FA	Food Authority

CHAPTER 1: INTRODUCTION

The International Trade Centre (ITC) is the joint agency of the World Trade Organization (WTO) and the United Nations (UN). It is the only development agency that is fully dedicated to supporting the internationalization of micro, small and medium enterprises (MSMEs). ITC's mission is to foster inclusive and sustainable economic development and contribute to achieving the United Nations Global Goals for Sustainable Development. ITC is implementing the EU funded 'Growth for Rural Advancement and Sustainable Progress' (GRASP) project which aims to contribute to the reduction of poverty through development of rural MSMEs in selected districts within two provinces of Pakistan: Balochistan and Sindh. GRASP will focus on selected product lines within livestock and horticulture. GRASP will take a holistic approach to building MSME competitiveness in agribusiness value chains starting from a deep understanding of markets and working back through the value chain to enable MSMEs and ultimately producers to create and capture additional value. To do this, GRASP will implement three outputs:

- Output-1. Institutional capacity strengthened and business environment improved for rural MSME development.
- Output-2. Agribusiness service providing MSMEs (run by Male/Female) and their BIOs are capacitated to enhance primary production and quality.
- Output-3. Commercially operating MSMEs Male/Female) are trained in appropriate environmentally sustainable technologies value and enhance marketed volumes.

Under output 1, GRASP will provide support to strengthen the regulatory and institutional frameworks in the areas of domestic commerce, agricultural policies and quality along with SPS at the federal and provincial levels, to enhance the competitiveness of rural MSMEs. Under the quality and SPS component of output 1, GRASP will be providing technical assistance to the Balochistan Food Authority (BFA) and Sindh Food Authority (SFA) to strengthen their institutional and technical capacities (including those of the human resources). Furthermore, it will improve their service portfolio, compliance mechanisms and effectively perform their functions in laying down standards, procedures, processes and guidelines in relation to food in the province (including food business, labeling, additives etc.). In this context, GRASP is undertaking a comprehensive institutional and capacity assessment of the two food authorities to identify the areas and activities in which there is a demand for technical assistance and to develop a plan for the strengthening of the two institutions according to the needs and aspirations of stakeholders and best international practices. Subsequently, GRASP will provide further technical support to implement the findings of the assessments.

Balochistan food authority was established through Balochistan food authority Act 2014 and its operational activities stated late in 2019. Balochistan food authority is assigned numerous powers and functions through this act to enable BFA to set food safety standards and regulations and to implement and enforce these standards in its jurisdiction. As a recently established institutions Balochistan food authority have established its head office with necessary infrastructure to house its employees. Human resource services from other allied

departments are hired on deputation basis for necessary functioning. BFA has been provided with building for central food control lab, and as next step purchase of laboratory equipment for central food control lab is in process. Process for securing mobile food labs has been initiated for rapid testing of food commodities during field operations. Licensing of food business premises has been started, whereas operational activities across Balochistan has started despite limited resources.

Achieving its mandate to safeguard Balochistan population against unsafe and substandard foods, highly concentrated efforts and focus is required for newly established food authority. Similarly, achieving globally accepted laboratory quality and safety perspective needs to be prioritized. Followed by basic lab setup, hiring of lab managers, experts and research officers is critical step for food safety authority.

Although, food regulations have been elaborately designed, yet there is need for comprehensive review of regulations with national and international food standards. For example, a preliminary review suggests there is need for drafting further regulations such as, regulations for discarding and disposal of unsafe food, food packaging materials, food recall procedures, marking of infant food, discarding used cooking oil, infant formula marketing, pasteurization for milk, novel/genetically modified foods, regulations on health claims etc. Moreover, there is need for more standard operating procedures (SOPs) such as, SOPs for storage and display of foods, SOPs for food recalls/traceability etc. Furthermore, interpretation of food safety standards should be uniform within the food authority which needs extensive training sessions. These training sessions should also integrate complaint handling and investigation of foodborne diseases, communicable diseases, and incident reporting skills.

Consumers are the highlight of food safety. They need to be aware of its impact and integrity. Food authorities need to develop frameworks that educate and raise awareness about food safety issues, consumer rights, complaint mechanisms, hygiene, sanitation, and compliance. Introduction of IT based dashboards and user-friendly mobile apps is a great head-start towards consumer awareness and capacity building of small Food business operators.

The need is momentous to improve, strengthen and institutionalize coordination and knowledge sharing mechanism among all stakeholders to support the functions of Balochistan Food Authority and ensure quality of food products as per national standards at all levels from farm to market for healthy Pakistan.

CHAPTER 2: BALOCHISTAN FOOD AUTHORITY: INSTITUTIONAL FRAMEWORK

The Government of Balochistan has enacted the Balochistan Food Authority (BFA) through Balochistan food authority Act, 2014. The Food Authority have status of a corporate body, having perpetual succession and a common seal with power to enter into a contract, acquire, possess or dispose of property and may, by its name, sue or be sued. The mandate of Balochistan food authority is to safeguard interest of consumers of foods and provide them with health, safe and nutrition food.

Composition of Food Authority

The composition of Balochistan food authority as approved by Balochistan food authority includes several members and is headed by a Chairperson nominated by Balochistan Government. Balochistan food authority as per its act included a very balanced representation of members from different ministries, representations form food technologists, farmers, chambers, politicians, and consumers. Other than these designated members, Food authority may opt to include any person as member BFA with Government approval. Similarly, apart from these members, there is provision in the act to nominate further members as non-official members if needed by Government of Balochistan.

1. Secretary, Food Department, Government of Balochistan
2. Secretary, Health Department, Government of Balochistan
3. Secretary, Public Health Engineering Department, Government of Balochistan
4. Secretary, Industries & Commerce Department, Government of Balochistan
5. Secretary, Agriculture Department, Government of Balochistan
6. Secretary Livestock & Dairy Development Department, Government of Balochistan
7. Secretary, Local Government & Community Development Department, Government of Balochistan
8. Three members of the Provincial Assembly of the Balochistan to be nominated by the Government
9. Two food technologists or scientists to be nominated by the Government
10. One representative of the Chambers of Commerce & Industry
11. One representative of Food Industry
12. One representative of Food operators
13. Two representatives of farmers
14. Two representatives of consumers

Objectives and mandate

The objective of Food Authority is to regulate and monitor the food business to ensure provision of safe food. The Authority has the mandate to formulate standards, procedures, processes, and guidelines in relation to food including food business, food labeling and food additives. In the same manner, food authority can specify enforcement systems and has the power to specify procedures and guidelines for setting up an accreditation of food laboratories.

As function of compliance with food standards, BFA can formulate method of sampling, analysis of samples and reporting of results. Food authority has a mandate to promotes general awareness to food safety and standards and can organize training programs in food safety and standards.

Power and functions of food authority:

According to Balochistan Food Authority Act 2014, following power and functions have been entrusted to the food authority.

- 1) The Food Authority shall regulate and monitor the food business in order to ensure provision of safe food.
- 2) Similarly, the Food Authority may–
 - i. formulate standards, procedures, processes and guidelines in relation to any aspect of food including food business, food labeling, food additive and specify appropriate enforcement systems
 - ii. specify procedures and guidelines for setting up and accreditation of food laboratories
 - iii. formulate method of sampling, analysis of samples and reporting of results
 - iv. specify licensing, prohibition orders, recall procedures, improvement notices or prosecution
 - v. determine terms and conditions of service of its employees
 - vi. provide scientific advice and technical support to the Government in matters relating to food
 - vii. collect and analyze relevant scientific and technical data relating to food
 - viii. establish a system of network of food operators and consumers to facilitate food safety and quality control
 - ix. organize training programs in food safety and standards
 - x. promote general awareness as to food safety and standards
 - xi. levy fee for registration, licensing and other services with prior approval of the Government
 - xii. certify food for export
 - xiii. perform any other prescribed function or do any other thing which is necessary for the discharge of its functions under the Act.

Constitution of scientific panel for BFA

As per Balochistan food authority act 2014

- (1) The Food Authority may establish one or more Scientific Panels, which shall consist of the following–

1. Director General of the Food Authority (Convener);
2. A representative, having background of food science or technology, of an organization established for determining standards and quality of food
3. A representative, having background of food science or technology, of an organization established for scientific or industrial research on food
4. A representative, having background of food science or technology, of the National Institute of Food Science & Technology, University of Agriculture, Faisalabad
5. A food technologist or scientist
6. A medical practitioner registered with Pakistan Medical and Dental Council; and
7. Three representatives of the food manufacturers in the relevant field.

Terms of reference for Scientific panel:

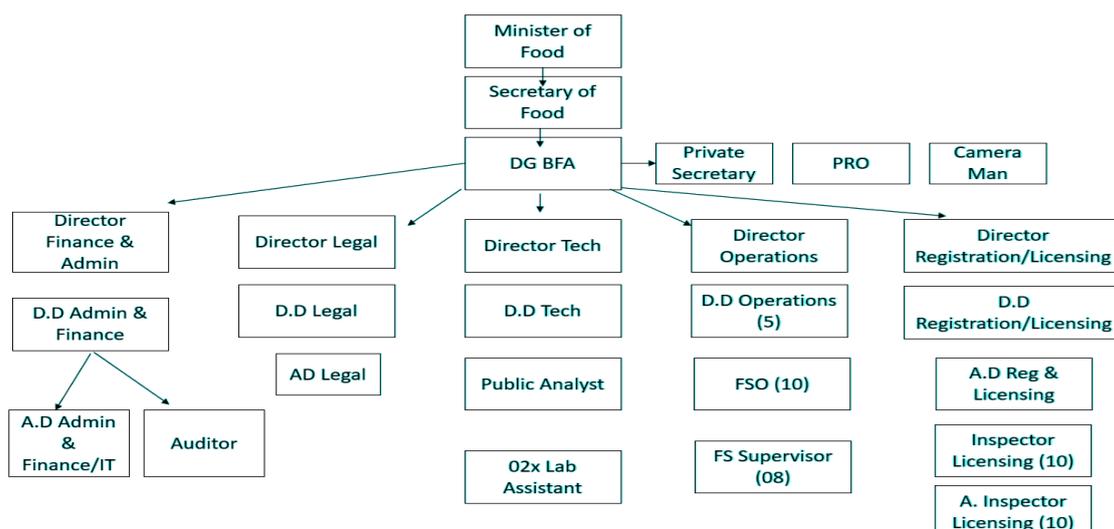
- i. A Scientific Panel may co-opt any other member from the relevant industry.
- ii. The Food Authority shall determine the terms and conditions, including tenure of members of a Scientific Panel other than ex-officio members.
- iii. The Food Authority may refer any matter relating to food to the Scientific Panel for recommendation.
- iv. The Scientific Panel may, after due deliberations with the relevant industry and consumer representatives, make recommendations to the Food Authority on standards, products, procedures, processes and guidelines in relation to any technical aspect of the food.
- v. If the Food Authority does not agree to the recommendations of the Scientific Panel, it may, with reasons, refer the case back to the Scientific Panel for reconsideration.
- vi. The Scientific Panel shall reconsider the reference and forward its reconsidered recommendations and the Food Authority shall act accordingly.

Organogram

According to the proposed organogram for BFA, Minister of Food acts as Chairman of BFA. Whereas Secretary Food and DG BFA work under guidance of Chairman BFA. There are five directorates working under DG BFA, these are

- i. Registration/Licensing,
- ii. Operations,
- iii. Technical,
- iv. Legal,
- v. Admin & Finance

As per newly proposed organization structure below is the organogram showing different roles and number of positions for every title.



Anticipated and sanctioned positions for future hiring in BFA for Quetta headquarter include:

Posts	Number of positions
Directors	5
Deputy Directors	9
Assistant Directors	5
Food Safety Officers	10
Public Analyst	1
Public Relation Officer	1
Food Safety Supervisor	8
Inspector Licensing	10
Assistant Inspector Licensing	10
Lab Assistant	2

CHAPTER 3 OPERATIONAL READINESS OF BFA

Achievements:

Despite these challenges, BFA has done a remarkable job since all government machinery is very keen to uplift the food safety standards in the province. It was found through consultative meetings with stakeholders that there is a serious resolve by every stakeholder to make food authority a real success. In this very limited time, BFA has taken a serious action to improve school food canteen in around 700 schools to make healthy food choices for school children. Similarly, major focus was laid on improving standards and awareness in masses about basic commodities like meat, dairy, fruits and vegetable, edible oil and ghee, water, and flour.

Establishment of a Food Academy is a very visionary goal as discussed with BFA’s leadership. Concept paper is being prepared by food department to establish a training institution of food department/BFA. One of the unique features of proposed food academy is to offer interdisciplinary trainings to all other allied departments within Balochistan to achieve SPS and related food commodity compliance. It is envisioned that through food academy all stakeholders such as farmers, retailers, distributors, storage related personnel and food

marketing can be trained under this initiative for need based skill sets. All these stakeholders are formally or informally involved in food supply chain and are expected to yield very holistic results. If this concept is well conceived and taken to the implementation phase it would be one of the hallmarks for food safety in Pakistan and first of its kind as well.

Operational activities of Balochistan Food Authority:

Balochistan Food Authority has not been fully functional till now and the related regulations for food safety standards and rules of business are in the process to be approved by provincial assembly. BFA at present have 4 Deputy Director Operations and 6 Food Safety Officers to carry out the mandated operational activities. Balochistan region is divided into seven divisions and 4 border offices for operationalization of its activities. These six notified divisions are

- i. Quetta (Headquarter)
- ii. Zhob Division at Loralai
- iii. Kalat Division at Khuzdar
- iv. Sibi Division at Sibi
- v. Naseerabad Division at Dera Murad Jamali
- vi. Mekran Division at Turbat
- vii. Rakhshan Division at Kharan

Similarly, there are four border district offices proposed for BFA, including

- i. Hab
- ii. Chamman
- iii. Rakhni
- iv. Jaffarabad

At present, these divisions are not functional due to absence of human resource and infrastructure. Service rules are yet to be formulated to start the hiring of regular staff for regional offices and headquarter. Current staff members are not regular employees of food authority and their services are hired from other departments from Balochistan government. With limited human resource, infrastructure, and related regulations BFA has started ground-breaking work for food safety in the provinces. Headquarter based at Quetta is carrying out the operations through its human resource throughout the vast spread of Balochistan. Managing the food safety regimen in this vast spread of land with scattered population and limited food industry is a unique challenge for BFA. Majority of food business are small scale, unregulated and based on primary industries especially agriculture produce like grapes, dates, and apples. Other industries include around 15 flour mills and approximately 50 small to medium scale food factories. Major food commodities are imported from other provinces and adjoining countries through formal and informal routes. Thus, monitoring and compliance of imported

food commodities is yet another unique challenge faced by BFA. To resolve this issue, four border district offices are planned to carry out the operational activities with these commodities imported from other provinces in BFA jurisdiction.

Registration and Licensing of food business:

This activity of registration and licensing of food business operators has started its operations from headquarter with limited support of field staff and IT based dashboards or field equipment. This is further challenging due to fact that majority of industry in Balochistan is in informal sector and based on raw material trade, with limited understanding of regulations or compliance in absence of any formal training or infrastructure is in place. In many cases it is being regulated by local administration such as meat and chicken shops for the purpose of registration. Balochistan imports majority of processed food from other provinces and for that purpose Balochistan food authority accepts license granted by other food authorities of exporting provinces. BFA envisions to work on five major commodities as priority sectors (meat, spices, dairy, fruits and vegetable).

Food safety standards and operational regulations

The BFA act was enacted in 2014 while operationalization of this Authority took a considerable time and was established in late 2019 with a time lapse of around 6 years. To fully operationalize; the BFA will have to send all newly developed regulations to the provincial law department for vetting so that the regulations can obtain its legislative position for the operations of BFA.

Balochistan Food Safety Regulations 2020 includes duties, powers of FA, licensing and registration for food businesses, sampling and procedure of seizure, medical fitness of food workers, prevention of food poisoning, regulations for food establishment and regulations related to each food category with respect to composition, additives etc.

However, as far as regulations are concerned, detailed guidelines regarding FBOs (Food business operators), SOPs for food manufacturers, traceability frameworks, operational jurisdiction of BFA and regulations regarding food borne illnesses have not been formulated.

Regulatory enforcement Mechanism

Monitoring and enforcement tools have been devised by BFA, however these are in the process of approval. Following enforcement tools have been prepared.

- i. Licensing of food business
- ii. Improvement notices
- iii. Prohibition order
- iv. Emergency prohibition order
- v. Notification of food poisoning

vi. Food recall procedures

According to the progress report BFA has started its field operations and is actively doing field inspections and corrective actions are being taken. Some of the highlight of these corrective actions against serious malpractices include operation against farmers growing vegetables from sewage water. Furthermore, several food outlets were sealed due to non-following of SOPs given by BFA.

BFA has inspected 14,740 units from January to November 2020 and a fine of PKR 8.33 million has been imposed. Furthermore, 152 units have been sealed throughout the year, 7,572 improvement notices have been served, and 106 products have been banned by BFA.

Technical Capacity of Balochistan Food Authority:

Food laboratories play a crucial role for implementation of food safety standards for any food authority. To analyze the compliance with food safety standards, recently Balochistan food authority has submitted a PC-1 (worth 151.7 million PKR) for a central food laboratory in Quetta and 2 mobile labs (worth 38.26 million PKR) in Turbat and Nasirabad for approval. It is expected to have a basic food control lab set up by 2021.

Currently, there is no laboratory support to analyze the samples. Procedural, training, and manuals for laboratory staff are yet to be prepared. Furthermore, field testing equipment which is vital for a food authority have not been provided by the BFA to the field inspection staff. Limited analytical services are available through third party laboratories due to financial constraints and lack of skilled workforce to handle food sampling. Analytical services from other government departments can be sought as per need and these relevant laboratories include Agriculture, livestock, health departments and Pakistan council for scientific and industrial research (PCSIR). It is pertinent to mention that these departments have only limited testing capacity for food analysis and are constrained for funding and human resource.

Balochistan Regulatory Reforms:

One of the encouraging fact is the coordination of different departments for uplifting food safety standards and stakeholder engagement from government departments is better established through boarder engagement among departments. It is further strengthened by the fact that the services for other departments are hired and unlike other provinces food safety authority is well accepted. Balochistan has been actively working on regulatory reform and currently reforms in agriculture regulations due to devolution of powers to provinces are under way. Baluchistan fertilizer act and Pesticide act are being developed. Similarly, other regulations in livestock, agriculture extensions and agriculture departments are being drafted. Moreover, Balochistan food authority, in its board of governors have presentations form secretaries from other departments. Secretary industries is assigned the role as focal person for food safety and food security, the positive outcome of this role is better interdepartmental coordination between industry and BFA. This harmony among departments at the onset is highly appreciable and it is right time to have better coordination mechanism by involvement

of technical experts across the board to formulate regulations and rules of business on holistic approach keeping in view Balochistan unique food landscape.

CHAPTER 4: NEED ASSESSMENT OF BALOCHISTAN FOOD AUTHORITY

Organization Structure:

While drawing comparison in terms of organization structure with earlier established provincial counter parts in Punjab and KPK it has been observed that following additional positions and their roles are assigned for various specialized tasks to streamline the functions of food authorities. The roles of these nodes at food authorities are more focused and specialized in terms of operation and responsibilities and this can be adopted by BFA for smooth functioning as well.

- i. Balochistan Food authority Schools: Through BFA do not have its own school, however, proposed food Academy can take up that role. The proposed food academy if established and supported can act like a training school. This academy can play critical role to produce master trainers, design standardized curriculum, certification systems and develop training module for different industries. It can fulfill the mandatory food safety training gap for food handlers and can also generate funds for sustainable outcomes.
- ii. Director Vigilance: keeping in view the rampant irregularities and malpractices a separate wing of vigilance to crackdown on spurious foods and malpractices would be very effective. This is even more needful at border districts to control substandard, non-compliant food to safeguard human health and spread of disease through crops and animals.
- iii. Director IT & Monitoring: for smooth communication, data management systems.

Harmonization of national and provincial food Regulations:

A detailed review of variation in national and provincial standards is required to reach to a uniform one national standard as directed by Government. PSQCA had been given this mandated to formulate national standards after consultation with provinces and there seem a lot of bottlenecks in terms of following.

- i. Formulating agreeable uniformed national standard for all provinces at national level is challenging task because of inherent difference among provinces. For example, different provincial territories have different industrial landscape, institution capacities and unique challenges depending upon type of industries located in their jurisdiction.
- ii. There is a need for further agreement in terms of registration and licensing of food premises and food products originating from these provinces.
- iii. Moreover, revenue generation and sharing has to be agreed upon between national and provincial government in terms of licensing fee and penalties imposed on FBO.
- iv. In addition to the mentioned, another challenge would be to reach an acceptable agreement in terms of laboratory results and acceptable laboratory protocols recognized at both national and provincial level for smooth functioning of national food control system.

Further regulations need to be drafted in harmony with other provinces:

There are different other regulations in place in existing food authorities in Pakistan and depending upon consequent approval and deliberations some of the below mentioned existing regulations can be formulated for harmonization across Pakistan.

1. Notification of food poisoning regulations
2. Food Packaging materials regulations
3. Marketing of Infant food regulations
4. Product registration and display of BFA logo regulations
5. SOP for storage and display of foods
6. Waste cooking oil regulations
7. Infant formula marketing regulations
8. Minimal pasteurization law for milk sold in Balochistan
9. Organic food standards
10. Genetically modified food standards.

Harmonization with International Standards:

Although the BFA regulations for food establishment have an agreement with developed world in general, yet these regulations are extremely weak in the context of product recall and traceability mechanism. In addition to a potential risk of food hazards, labeling of food products should be according to EU and Codex standards and a separate section should be assigned for novel and GMO foods. Also, HACCP implementation should be ensured along with stringent guidelines for import/export foods, special consideration towards zoonotic diseases and pest management should be detailed extensively. Prudent regulations are recommended on food labelling and health claims are required.

Constraints of BFA

There is great deal of capacity building work that would be required to make the BFA a functional entity. In addition to the issues highlighted above, following considerations can be suggested.

- i. Food safety trainings for BFA staff is a mandatory requirement not only for their capacity building but also as legal requirement and improving their capacity to train food business operators. Food safety level-1 training has been conducted for only few staff members and on business operator levels there are no capacity building trainings related to food operations, food safety is in practice.
- ii. BFA needs help in conducting filed surveys and field data collection to issues related to food safety, licensing of premises and product registration due to vast scatter of food businesses and limited field staff. There are similar issues with communication and advocacy as well as consumer awareness and education.
- iii. Balochistan food industry landscape is unique in a way that it is dominated by small scale industry and informal sector. FBO seriously lack technical skills and food safety and

compliance knowledge. Keeping in view the food industry landscape of Balochistan province it is critical to educate and train FBO for food safety and compliance.

- iv. Halal and traceability issues are a challenge for BFA particularly for Balochistan regions because of border districts attached with other countries/provinces and administrative jurisdictions. Food is imported from other territories and there are issues related to quarantine, animal health, and compliance issues with food items especially traceability, labelling, and halal origin of foods. Non-compliance and testing at bordering districts lead to influx of sub-standard food products and can be a serious threat to food safety and compliance with BFA standards cannot be achieved.
- v. There are capacity flaws with allied departments as well that lead to poor performance of food safety regime. For example, Agricultural Department of Balochistan has certain capacity issues which leads to weakness of food safety regime. Agriculture employees around 1400 field officers with no official training history. No training institute exists for field officers and they have serious issues of capacity that leads to issues of food safety at later stages. Major crops of Balochistan include apple, tomatoes, grapes unfortunately, lack cold storage facilities and there is drop in export of these commodities to other countries due to non-conformity with international food standard.
- vi. Scientific panel members meeting need to be conducted on regular basis and sound technical inputs and support system is required for smooth functioning and relevant food legislation.
- vii. Grant in aid funding is available for operation of BFA, however, no fixed amount of budget is allocated to BFA.

CHAPTER 5: RECOMMENDATIONS

Food safety and compliance in Pakistan has been neglected for a very long time and it came into limelight very recently through activation of provincial food authorities. Achieving an aggressive target of safe and healthy food for masses is a very challenging task. This would for sure require very serious efforts in terms of capacity building in every aspect of supply chain of food. It is pertinent to mention that this chapter highlights numerous capacity gaps among food authorities in general and suggestions are made for improvements based on technical inputs by consultant, benchmarking regional and international best practices and keeping in mind the local food safety challenges. Food authorities in general are constrained by availability of human resource, finances, and infrastructure and above all very serious food safety challenges, rampant adulteration practices across the board. These institutions are challenged to provide safe food, whereas provision of safe food is multifaceted and needs to focus many dimensions whether social, institutional, regulatory, supply chain, awareness, or advocacy and above all highly technical requirements. Due to this complex nature of food safety problem food authorities need tremendous focus on mandate and support from all stakeholders for its capacity building.

In many of highlighted areas, none of food authorities can enhance internal capacity due to the specialized nature of those challenges and technical assistance is only way forward for these newly established food authorities in Pakistan. Food authorities have been supported by many international donors, national governments for technical assistance in those areas and there are lot of new technical assistance areas are highlighted in this chapter for further technical assistance and support to food authorities.

Technical capacity Building:

Food safety and compliance with food standards is a highly technical subject and requires technical capabilities and diverse skill set. Whereas food authorities are quite a recent development in Pakistan where new food standards are being framed and related rules of business being established. Food safety related issues are unique to this region and these issues had been ignored since decades. For example, adulteration of food commodities and non-compliance with standards and even awareness about applicable standards has been noticed in absence of provincial food authorities particularly for small, medium or unorganized food sector. Keeping in view all these facts in mind it is obvious to understand that challenges for newly established regulatory bodies are of massive scale.

Technical skills gaps

1. Food safety awareness of real issues and constant update about new emerging adulterants and malpractices is a challenge at national level. Even at universities, food safety research has been overlooked since inception of Pakistan. Balochistan universities are not offering any food safety related courses or research. Hence food safety and adulteration or other malpractices are not properly addressed and lack of data about Balochistan provinces is a serious concern. In general, other provincial data suggest gravity of food safety challenges

is very alarming. Punjab food authority sets a good example to have separate research and development budget for local food safety related research and data collection to improve regulatory standards in accordance with evidence generated. Newly established food authorities in general have fresh graduate inducted as food safety officers with limited specialization and exposure to food safety issues. This problem can be ameliorated by involvement of academic and technical experts in scientific panel and better collaboration with local universities for evidence generation in emerging issues.

2. Awareness of local food safety and adulteration challenges, how to address those challenges and their implication is an evolving concern for food authorities. There should be a strong link with local R&D organization to update knowledge and field staff should be constantly educated about new issues through training and refresher courses. Involving resource persons and conducting focused seminars on specific issues related to food safety/nutrition is suggested for capacity enhancement in terms of awareness.
3. Ability to set up fully functional and fit for purpose food control laboratories is yet another challenge for food authority to have a dedicated building, layouts, scope of lab testing, equipment, and instrumentation. Third party support is highly recommended for these specialized tasks because of a general lack of expertise in government sector, particularly in this sector.
4. Similarly, apart from establishing food control laboratories, management of such food control labs in terms of record keeping confidentiality measures for the sake of transparency and fairness. Training should be conducted by third party at local or international level and exposure visits for technical wing can equip them with such skills.
5. Specialized trainings for food safety officers and food analysts should be designed and delivered on food sampling with focus on legal requirements as per food regulations, labelling, transportation and handling of food samples, record keeping, and sampling gears required for different food commodities.
6. Since food analysis is a very challenging and highly specialized field, coupled with the fact that there are huge number of analytical tests are involved and they have a legal binding on food authorities it is recommended that capacity building in terms of analytical skills of running food analysis equipment will be required at later stages once equipment is procured.
7. Development of standard analytical methods and protocols is a critical step for any food control laboratory in terms of quality control, ease of operations, smooth management, legal compliance, and fairness principles. It is recommended that BFA technical wing should establish its standard operating procedures and it should be disseminated not internally but externally as well.
8. Development of manuals for standard methods of analysis would be highly useful to avoid duplication of efforts, training of new staff and consistency of analytical outcomes. Such manuals not only would be applicable for food authority internal working, but external third-party laboratories should follow these standard procedures to avoid errors and variations in outcomes.
9. Reporting and interpretation of sample analysis needs to have uniformity across all labs within province and across country to have transparency and fairness in operations. This

would be possible by a review of current practices and update of these procedures based on review outcomes.

10. Quality systems such as Good laboratory practices (GLP), ISO 17025 awareness and implementation and accreditation with international bodies would be very useful once the food control laboratories are established by BFA.

Operational Capacity Building

Operation capacity for a food authority is linked with many factors such as.

- i. Availability of human resources is vital for operation of Balochistan food authority. Being recently established entity staff needs are unmet both in terms of operational staff and technical staff. FSA has yet to establish divisional and border offices along with complete infrastructure in terms of building, laboratories, and human resources. Unless FSA becomes fully functional across all Balochistan licensing of food premises and product registration will remain a challenge. Similarly, exercising control on smuggled food products or imported food products for quality assurance and compliance is special challenge for Balochistan.
- ii. Availability of standard operating procedures and rules of business needs to be further drafted in areas such as recall procedures, traceability mechanisms, halal, and SPS related matters particularly for Balochistan. Halal standards and compliance is a special need for Balochistan.
- iii. Availability of labs is one of the major hurdle for compliance. Through approved PC-1 BFA is in a process to start the process of equipment procurement for a central lab for Quetta, and two mobile van labs for field testing.
- iv. Coordination mechanism within food authority, regional teams, headquarter, other sections of food authority can be further improved by having dedicated dashboards and provision of tablets where real time information can be processed regarding implementation and enforcement outcomes.
- v. Coordination and communication among departments and with other stakeholders needs to be further strengthened this is particularly relevant for consumers engagement, donor agencies, gender representation.
- vi. Trainings are needed for field officers in many aspects such as communication skills and incident reporting particularly designed for food safety officers. Further to this commodity specific trainings for food safety offices would be more effective where only food safety officers trained commodity such as meat, dairy, agriculture, oil and ghee, flour etc. can inspect relevant FBO for better transparency and to avoid lawsuits and appeals against food authority.
- vii. Interpretation of food safety standards and regulations should be uniform within food authority staff, this can be achieved by rigorous on job training and refresher courses for food safety officers.

- viii. Food commodity survey and data collections ability of field staff to design effective interventions is very critical due to lack of food safety data and research as mentioned earlier. This information would be helpful for formulating need base standards for region. For example, many local food products are not standardized in terms of safety and quality standards e.g., milk in terms of microbial load, total fat and solid nonfat solids differ on regional and seasonal basis. Similarly, consumption pattern and consumer opinion surveys can also help draft relevant regulations.
- ix. Mechanism for incident reporting is very critical as it has been observed in many cases of food poisoning in country in general has not been properly handled due to overlapping areas of responsibility between local governments, law enforcement agencies, health department and food authorities.
- x. Complaint handling and investigation of food borne diseases, communicable diseases spread through food is very specialized area and this needs to be addressed in terms of training and formulations of regulations.

Regulatory Capacity Building:

Regulatory capacity building entails all the skills and capacities to be able to frame robust, holistic, realistic, and applicable food safety standards considering both regional needs and international standards. Whereas these skills are mostly acquired and come with practical exposure of subject matter and discipline knowledge and qualification. It is a slow process that can gradually improve with uplifting standards in food industry, awareness among consumers and learning curve from field operations. With regards to Pakistan food standards, this process remained at halt for around six decades after food standards framework of 1960s. After 2010 this process of having new food authorities started and first ever improvement came with Punjab Pure food regulations 2017 and later with next version of these regulations in 2018.

Capacity building issues related to framing regulatory mechanism can be improved by:

- i. Having flexibility in rules of business to modify standards as and when needed based on new understanding of issues, new scientific knowledge, new food safety issues and challenges etc. These challenges can be met by involvement of all relevant stakeholder and scientific panel in decision making on case-to-case basis so that food standards and operational issues are resolved as soon as possible based on real learning of ground realities. This is evident by frequent updates of food regulations in regional food authorities such as FSSAI and provincial level by Punjab food authority. It has been learnt that despite adopting international standards for majority of food commodities, food safety standards for local food products/practices are not promulgated. When food authorities started enforcing food regulations there came a steep learning curve with realization of local products/process issues. Food business associations have played a critical role in formulating standards on the basis of local needs through their involvement with food authorities.
- ii. Mechanisms to base new food safety standards on risk assessment basis is highly recommended. However, relevant capacity for risk assessment and institutionalization of

risk assessment is never practiced because it involves multiple departments working coherently. Whereas food authorities in general addressed these issues as an institution in isolation, the impact of new food safety regimen has not realized its potential. Major reason for this isolation is the institutional structure and mechanism of allied department is not autonomous, outdated regulations and poor capacity issues.

- iii. Understanding of regional and international food safety standards and best practices and following these practices are very important. Since Codex standards and international standards provide general guidelines and robust safety standards, local scenarios may be different and food regulations should be able to address local challenges. Some examples are SOPs for local food vendors, local cuisines, unregulated food sector and adulteration malpractices unique to this region needs to be seriously addressed.
- iv. Harmonization of food safety standards at national and international level for ease of doing business is strongly felt by food business operating at national and international level. It is argued by food industry associations that they must comply to multiple standards/protocols due to variations in relevant food authority regulations. For example, there are varied labelling requirements, separate premises and product registration requirements as well as variation in safety and quality standards at interprovincial and intra-provincial level.
- v. At food business handler level, it is equally important to educate food business operators about regulatory standards, their compliance, importance of these standards and capacity strengthening for compliance. Particularly for MSME businesses in Balochistan needs specific trainings for food business operations, safety, hygiene and compliance related capacities.
- vi. Food Authority also needs to play role in creating awareness about nutrition sensitive approaches and role of food safety for food security by arranging media campaigns to involve public seminars, involving food ambassador programs at academic level as practiced by Punjab food authority and radio channels.

Adopting National Food Control System approach:

With devolution of powers food, health, agriculture and livestock and all related departments have a mandate to have their own set of standards and rules of business at provincial level. Establishment of food authorities at provincial level was a first step to establish independent food authorities. While adoption of new standards and rules of business and progress in food department was extraordinary as compared to other departments. Partly this can be attributed to autonomy and flexibility inherent in food authority acts for all of food authorities. Further improvement can be attributed to availability of funds and technical assistance provider support to food authorities.

It is very evident that there is need for following actions to adopt a national food control system approach.

- i. It is pertinent to mention that to bring order in this national food control system to uplift food safety standards and SPS measures major reforms are needed in every allied departments that provide raw materials for food. A comprehensive review by field experts is required to align related regulations of allied departments so that food safety from farm to fork approach can be improved. Examples include agriculture, livestock, quarantine and plant health departments, seed certifications, health, veterinary health, primary industries etc. It is important to reframe new regulations in these sectors with a holistic approach.
- ii. Moreover, there is need for review of internal standards with national and regional standards where there is overlapping of area of responsibility. Such as role of PSQCA as national standardization body and its implementation for import regulations by federal government is overlapping with provincial standards and autonomy. Similarly, rendered animal oil is another example, misuse of used vegetable oil and rendered animal oil has been practiced for human consumption routinely across Pakistan. To discourage this menace different provinces formulated standards to ban use of rendered fats and used oils, however poultry feed regulations allow use of rendered fats for feed purposes. It is worth mentioning there are multiple examples of these overlapping/grey areas and it demands a comprehensive review and comparisons among different regulatory standards within departments and across departments i.e. local, provincial and where possible national and international level harmonization is needed.
- iii. After having uniformed standards within provinces, the next challenge to streamline food safety compliance and transparency, there is need to establish rules of business for allied department that should be in harmony with these regulations and standards.
- iv. Governance mechanism is direly needed with different departments as there are overlapping in terms of areas of responsibility within department and duplication of efforts leads to wastage of resources and badly impacts ease of doing business. For example, in case of meat processing slaughterhouses and chicken meat shops are regulated by local administration or livestock department whereas many cases safety of these commodities is compromised. This is also applicable to quarantine inspection of food commodities by quarantine department, inspection of food commodities at customs department by ministry of commerce, pesticide residues in food commodities by pesticide labs working under agriculture department, drug residues and zoonotic diseases in meat and dairy by livestock department are few examples. Similarly, Agriculture, storage practices, communicable and zoonotic diseases are some more examples where area of responsibility is not clearly defined in terms of regulations. Due to these factors, food authority cannot intervene or take punitive measures in many such cases to streamline the food safety regime. However, it is right time as provincial governments have started drafting provincial regulation for devolved subjects and it offers an opportunity to consider all these hurdles to adopt a robust food system approach by working in collaboration within departments.

- v. Food incident reporting mechanism and helpline needs to be established for recall or withdrawal of the food product from market, which is a public health threat, for this purpose a sophisticated traceability mechanism needs to be established to immediately withdraw products from market either through producer or BFA operation wing.

In summary, capacity building is required at various levels (individual, organization, and systems level) with respect to food safety and quality. Capacity building should initially involve system level efforts (which involves any revisions necessary in the policies and regulatory documents i.e. detailed guidelines to be provided regarding FBO, SOPs for food manufacturers, traceability frameworks, operational jurisdiction of BFA, regulations regarding food borne illnesses, GMOs and zoonotic diseases) then involve individual level efforts (for food producers, processors, distributors, consumers etc. on basic food safety and newly formulated food regulations and rules of business). After that the focus should be the organization level (i.e. BFA's operational staff, food enterprises, food inspectors, consumer groups and stakeholder groups) at first, the focus should be the capacity assessment of relevant stakeholders related to implementation of SPS, WTO measures in the province (i.e. Food, Livestock, Agriculture, Trade, Health etc.) to ensure strengthening of food authorities and uplifting the FBO status for export globally, another important aspect is to guide the staff of food control laboratories about food sampling, handling, and their analysis, furthermore, for the purpose of transparency, fairness and improvement of regulatory compliances lab manuals and SOPs should be drafted and shared with FBO and technical staff for ease of compliance. Similarly, implementation of quality management systems at BFA labs would be a way forward to create credibility of these reports generated by these labs and reduction in legal issues/court cases and lawsuits.

Consumer Awareness and Advocacy:

Consumer of food plays very critical role in the whole eco-system and it is equally pertinent for all government departments to serve the end user in amicable way. It is apparently disconnected with authorities and end users. Food authorities should have a mechanism to educate and raise awareness about food safety issues, consumer rights, complaint mechanisms, nutrition and health, hygiene and sanitation and compliance reports of various food industries. Similarly, at organization level food authority should have a communication strategy to gain more acceptance from stakeholders including industry and consumers. Since food safety regime is relatively recent in Pakistan, it is important to make comprehensible food regulations for small business in the form of easily understandable requirements for commodity specific vendors including registration, licensing, standards, enforcement, and complaint redresses etc. IT based dashboard and consumer friendly mobile apps can be useful tool for consumer awareness and capacity building of small business owners.

Training needs:

Systematic trainings can be conducted at all tiers of food authority. Some of the suggested modular breakdown with hierarchy are as below:

1. Top Management level Trainings and exposure visits are highly relevant for newly established for authorities both at national and international level. These sorts of trainings and exposure visits are highly recommended for management and administration to equip them with the concept of national food control systems and how established food authorities function in other regions. Similarly, trainings on international obligations in wake of WTO, IPO, SPS measures and international obligations for food control are required. nutrition sensitive approaches, international regulations, other regulations impacting food safety and international trade, effective communications and leadership are some of the highlighted areas that can be considered while developing capacity building programs.
2. For technical wings, trainings on below mentioned area are essential. Food safety level-1, Food safety level-2, Food safety level-3, Person in Charge and Hazard analyst at critical control point (HACCP) trainings are highly recommended for food authority technical staff. This should be followed by trainings to food business operators.
3. Other trainings include Food safety issues/inquiry of incidents, interpretation of regulations, food sampling, food handling, food analysis, training requirements for lab staff, interpretation of results, lab accreditations, analytical techniques etc.
4. For operations department technical capacity building of MSME, making it use friendly, rating and appreciations for MSME, ease of doing business for MSME and involvement of industry and business associations to develop understanding of the local industry challenges and mitigating them would be useful.
5. SPS capacity building needs to be given attention by interdepartmental workshops/ training sessions for relevant stakeholders i.e. Agriculture, Livestock and Quarantine Departments.

Coordination and Communication Mechanism:

Keeping in view the multi stakeholder involvement in the food safety and quality domain, it is crucial for any food authority to have strong coordination mechanism with all stakeholders by

- i. Involving industry, academia, chambers, associations, education institutions, food department, gender experts, community level organizations, training institutions etc. other line departments- Food/agriculture/livestock/trade/public health and local Government departments. This can be done through food academy platform in Balochistan or otherwise through technical wing to organize trainings/seminars/workshop for inputs, capacity building and advocacy purposes. Technical assistance from other institution is also recommended.
- ii. Involving quarantine, agriculture, trade and livestock experts in the scientific panels of BFA is of high value and there should be routine meetings of these experts on case to case basis and food standards should be reframed if and when needed on the basis of technical opinion.
- iii. An IT wing to support communications among BFA departments is highly relevant as established by other effective FAs such as Punjab and KPK food authorities. A dashboard for effective coordination among food staff and top management would be an effective tool for real time updates and action by food authority staff would streamline the overall

performance of BFA. Similarly, medical screening and food safety training certifications and license updates, fines and penalties can be interlinked on such dashboards for effective management.

- iv. Removing bottlenecks for exports i.e. (solving SPS capacity gaps for improving market access) by reducing the risk of pests, diseases, and health burden through collaboration with Health, Quarantine, Livestock and Agriculture Departments would make it easy for MSME to be able to export agriculture and food commodities and generate revenues.

Gender Integration:

It should be ensured that equal opportunities for both genders are provided at every level in employment, decision making, growth and inclusion at Balochistan food authority and business sector and at consumer level. This can be ensured through gender participations in all these technical, policy and management level meetings and decision-making process. Keeping in view the food insecurity and its profound impact on women nutritional status and health, nutrition sensitive approaches need to be promoted by BFA through its media and public awareness campaigns. The role of food authorities through social medial and print and electronic media has been profound and it played a key role in sensitization about food safety and nutrition.

Other Considerations:

1. Food authorities are resource scarce and poorly funded. To make their operations more sustainable, sustainable business models need to be devised for funds generations and management. Striving for bilateral donor funded projects (FAO and or OIE) for ensuring food safety, animal, and plant health control is one immediate way forward to deal with short term financial shortcomings. However, long term sustainability is possible through creation of services and charging fees, fine collection, collection of revenue through premises and product registration. Food Academy can also play its role in revenue generation by offering paid training programs.
2. Licensing of new food business is a huge task keeping in mind the huge number of business operators in different sectors and limited number of field staff available with BFA. There is a need for stronger licensing mechanism with embedded IT systems to help ensure implementation of enforcement tools such as prohibition orders, improvement notices and food recalls.
3. Moreover, product registration needs a lot of dedicated work to register each product and assuring compliance such as composition, label, and categorization of product as per BFA food regulations. Product registration needs provision of technical report before approval by BFA. Product registration wing can be helpful for better coverage and thus compliance with standards.
4. Food handlers of food businesses need to be trained on food safety and hygiene as it is mandatory requirement through these regulations to grant a license to FBO. However, limited capacity to train huge number of food handlers in organized and less organized

sectors is a challenge. This can be addressed by developing online modules/interventions/trainings and record keeping systems for such food handlers.

5. Record keeping for mandatory food safety training and medical screening as essential legal requirement for approval of food handler. This data is very critical to ensure compliance and it is equally difficult without having a mechanism for record keeping. Record keeping should be done through MIS to keep record of approved food handlers and status of regulatory compliance for food handlers.
6. Inspection SOPs should be different for each province depending upon types of industries and status of industries in each province. In general, for organized food sector these SOPs can be in harmony with globally followed SOPs. However, for street vendors/less organized sector/cottage industries and small-scale eateries these SOPs should be drafted as per local conditions.
7. Auditing standards for food product registration and food premises licensing are variable across provincial authorities. BFA's proposed regulations have a separate section for regulations for food establishment unlike other provincial authorities where SOPs specific to food premises at par with local conditions are mentioned.
8. Product licensing should be harmonized across provinces to facilitate FBO. One of the concerns by FBO is that they have to undergo expensive and frequent compliance analysis requirements for each authority registration separately, raising cost and duplication of efforts.
9. Campaigns should be run to make the public and food businesses aware about hazards of food adulteration and its impact on quality of life.
10. Nutritional labelling and regulations on health claims should be ensured on all food products registered under BFA.
11. Food poisoning cases in interior Balochistan needs to be given attention for ensuring public health and these should be used as case studies to ensure restricting such cases and eradication of their root causes.

CHAPTER 6: 5-YEAR ACTION PLAN BALOCHISTAN FOOD AUTHORITY

Purpose:

The purpose of this consultancy is to conduct a comprehensive institutional capacity assessment of the BFA to identify the areas and activities in which there is a demand for technical assistance and to develop a plan for strengthening of the FA according to the needs and aspirations of stakeholders and best international practices.

Directions:

1. This work plan will serve as a bench mark for next 5 year activities
2. Distribution of work plan copies among FA personnel and stakeholders would be necessary to keep track of the progress, along with awareness about risks of potential barriers in progress and mitigation strategies.
3. Keep copies handy to bring to meetings to review and update regularly. Work plan can be reformed according to the situations (especially during COVID era)
4. Coordination of BFA with different departments i.e. Agriculture, Livestock, Trade, Health, SPS (Sanitary and Phyto-sanitary), WTO (World Trade Organization), Quarantine, Industry and Consumers to ensure harmonization for strengthening of BFA's regulatory writ

Expected Results/Accomplishments:

- i. Coordination among stakeholders is an important step in this 5 year action plan to clear out any exiting loopholes in Balochistan food safety management systems.
- ii. Strengthening of BFA by ensuring the implementation of food safety and hygiene at all levels.
- iii. Adaptation of globally accepted best practices by both food handlers and food regulators.
- iv. Revision of PC1 of food laboratories (central/mobile) for their approval and to make them operational as per international standards.
- v. Capacity building at individual, organization and framework level.
- vi. Development of an organized food safety system with globally accepted functional components.

<p>Action Steps-1 Infrastructure/Lab</p>	<ol style="list-style-type: none"> 1. Establishment of Central Food Control lab, regional laboratory setup and mobile van labs. Suitable infrastructure/layout for food control labs depending upon nature of food analysis. 2. Guidelines for quality systems and accreditation of these labs. 3. Hiring of Technical staff for labs/Capacity building for technical staff. 4. Mechanism and guidelines/protocols for food analysis through subsidiary third party private/government labs
<p>Action Steps-2 Licensing & Registration</p>	<p>Development of website and web portal for communication. Development of registration and licensing wing. Licensing and registration of food premises and product registration protocols and MIS system. Comprehensive IT Dashboard Development of a comprehensive dashboard with real time updated information. User friendly applications with commodity compliance education details. Licensing mechanism needs to be improved along with product registration and specific guidelines to be established for medical checkup of food handler’s safety training certification records</p>
<p>Action Step-3 Institutional Structure</p>	<p>Governance and Institutional structure issues should be addressed in terms of shortage of HR and inclusion of new roles as practices within country such as legal advisors, vigilance, and public relation departments.</p> <p>Development and strengthening of internal R&D and data collection/research capability for local food safety issues in data scarce areas for effective regulatory and compliance coverage.</p> <p>Establishment of Food academy and designing training schedules among farm to fork stakeholder engagement through sustainable modular approach.</p>
<p>Action Steps 4 Capacity Building Trainings</p>	<p>Some of the suggested training sessions to be organized by Food academy for different sections of BFA</p> <ol style="list-style-type: none"> i. Top Management: Managing Food authorities, food control systems, exposure visits, compliance, WTO, SPS etc. ii. Technical management: on basic food safety & hygiene, food handling, sampling, analysis, HACCP, and regulatory affairs) should be conducted for food handlers of food businesses with dairy, spice, oil, water and meat being priority areas. iii. Furthermore, stakeholders i.e. PSQCA, Livestock, Agriculture, local Government, Food, WTO, SPS and Quarantine Departments should be involved to ensure harmonization and to make collaborative efforts fruitful especially in terms of regulations and training of staff on relevant aspects iv. Operation management staff can be inducted into training areas such as ease of doing business for MSME, leadership and communication skills, community engagement and development. v. Similarly incident reporting, risk assessment or global food systems and regulation awareness trainings can be conducted to technical resource persons/scientific panel.

<p>Action Steps 5 Public Relations/Inspections</p>	<p>A campaign should be run to guide general public and food businesses about food adulteration and how it's an unethical practice, furthermore, an online monthly magazine /social media strategy should be developed by food department for sharing information and important achievements of BFA. Development of robust reporting system for public in case of outbreak, non-compliance, food safety incident Development of mock/friendly audit systems to familiarize FBO about new food safety regime and protocols. Human resource development for food safety officers with commodity specific training for inspection Training/refresher courses/on-job training for food safety officers about interpretation of regulations and how to conduct food safety audits.</p>
<p>.Action Step-6 Stakeholder engagement Mechanism</p>	<p>Engagement of stakeholders (i.e. Food, Agriculture, Extension, Trade, Finance, Planning and Development, Public health, Livestock, Industry representatives and Local Government for collaborative efforts towards uplifting food safety in province through engagement mechanism of technical expertise across allied departments. Food academy can play a bonding role between these departments by development of effective liaison and need assessment of stakeholders and capacity building for all the food supply chain stakeholders.</p>
<p>Action Step -7 Formulation of regulations</p>	<p>Formulation/approval of comprehensive rules of business and Implementation/enforcement tools. Some of highlighted areas may include but not limited to</p> <ol style="list-style-type: none"> i. Food Packaging materials regulations ii. Implementation and enforcement regulations iii. Improvement notices, prohibition order and emergency prohibition order regulations iv. Marketing of Infant food regulations v. Product registration and display of BFA logo regulations vi. SOP for field visits vii. SOP for storage and display of foods viii. Waste cooking oil regulations ix. Infant formula marketing regulations x. Minimal pasteurization law for milk sold in Balochistan
<p>Action Step-8 Harmonization of Standard</p>	<p>Harmonization of standards is needed at three tiers.</p> <ol style="list-style-type: none"> 1. At provincial level: comprehensive review and comparison is required to harmonize standards across provinces and to reduce variation among standards and rules of business to facilitate FBO. 2. At national level: Harmonization of standards and rules of business mutually agreed by all provinces to be set as national standards as directed by national government and implementation/enforcement mechanism devised for provincial level. 3. At International level: Comprehensive review is needed to harmonize with international standards where possible and to include more areas under food regulations previously not included for example, organic foods, genetically modified foods and health claim regulations to name a few.
<p>Action Steps 9 Advocacy Strategy</p>	<p>Capacity building in terms export/import related food regulations, rules of business and development of a sound advocacy strategy for harmonization between other departments where area of responsibility overlaps and coordination would yield better compliance to SPS both at provincial and national level.</p>

Evidence of Success

- i. Positive feedback from stakeholders
- ii. Information dissemination among all the components throughout the chain
- iii. Checklist of plan of action every month
- iv. Physical realization of PC-I draft in the form of functional Food Quality Control lab/Mobile Lab.
- v. Capacity built at individual/organization/framework level
- vi. Improving regulatory and food safety situation in Balochistan

Evaluation Process

- i) Evaluation through 3rd party auditors
- ii) Evaluation by means of internationally recognized bodies.

ANNEX 1: EQUIPMENT LIST FOR BFA CENTRAL LAB

Below is list of equipment requested by Balochistan food authority in its PC-1 for approval from Government of Balochistan.

Sr. NO	Name of Equipment
1	Lactoscan
2	Tintometer for oil testing
3	GCMS-MS
4	FTIR
5	Polymerase Chain reaction
6	Moisture tester for oil and water
7	Kjeldahl apparatus for protein determination
8	Elisa Automatic liquid sampler and reader
9	Analytic balance
10	Conductivity meter
11	Rapid moisture meter
12	Moisture analyzer Halogen lam
13	Refractometer digital for sugar Brix.
14	Bomb Calorimeter
15	UV-VIS Scanning spectrophotometer
16	Automatic polarimeter
17	Water bath automatic
18	Muffle Furnace
19	Potentionmeter
20	Rotary evaporator
21	Refrigerated Centrifuges
22	Water purification system
23	Soxhlet apparatus
24	Microscope
25	Autoclave
26	Melting point apparatus
27	Biosafety Cabinets
28	Incubator
29	Florescence detectors for HPLC

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