



MINISTRY OF HEALTH Government of the Republic of Trinidad and Tobago

**MINISTRY OF HEALTH'S WRITTEN SUBMISSIONS
TO THE JOINT SELECT COMMITTEE ON FINANCE
AND LEGAL AFFAIRS**

**Additional Questions on the
Inquiry into Food Fraud in Trinidad and Tobago**

MINISTRY OF HEALTH

31/07/2017

JOINT SELECT COMMITTEE ON FINANCE & LEGAL AFFAIRS
Second Session (2016/2017) of the 11th Parliament on an Inquiry into
Food Fraud in Trinidad and Tobago

**OBJECTIVE 3: RECOMMENDATIONS FOR THE IMPROVEMENT OF STANDARDS
IN THE LOCAL FOOD INDUSTRY (BOTH IN THE SHORT AND LONG TERM).**

a) The draft food safety policy developed by the Ministries of Agriculture and Health should be widely circulated to members of the public for comment.

The draft Trinidad and Tobago Food Safety Policy (FSP) will be circulated for public comment with consultations among key stakeholders and for final endorsement and approval in the fiscal year 2018.

b) Arising out of the policy referred to at (a) documented standards must be drafted to guide the inspectorate. These standards should meet international standards but where appropriate, be tailored for this jurisdiction.

There are international standards and product specifications for specific foods. These include the Codex standards, Code of Practice and Guidelines and Regulations, which will be tailored to T&T setting. The development of a Risk Based Food Inspection Manual in conjunction with the Pan American Health Organization (PAHO) and the Food and Agriculture Organisation (FAO) will be used as the model to conduct inspection at manufacturing facilities.

Currently, the Chemistry, Food and Drugs Division (CFDD) inspectors are guided by inspection/audit forms which cover all the areas of Good Manufacturing Practices. Also, the provisions in the Food and Drugs Act and Fish Regulations are in place to monitor and audit fish processors for the purpose of issuing the Certificate of Establishment. These audit and inspection forms used when conducting inspections and audits of manufacturing facilities include:

1. Audit and Inspection of Fish and Fishery Establishment Form
2. Supermarket Inspection Form
3. Factory Inspection Form

c) In the interim, there must be strengthening of coordinating mechanisms amongst these agencies. In this regard, a Memorandum of Understanding (MOU) should be constituted within 3 months from the date of presentation of this report between the Ministry of Health, the Ministry of Trade and Industry (in particular the Consumer Affairs Division), the Customs Division and the Ministry of Agriculture, Land & Fisheries to facilitate more feet on the ground, given the limited resources that may be available to individual departments.

Currently, the CFDD interacts with the Ministry of Trade and Industry (Consumer Affairs Division), Customs Division and Ministry of Agriculture Land and Fisheries through the following mechanisms:

- The Consumer Affairs Division (CAD) provides information to the CFDD pertaining to complaints/notifications regarding food safety issues that have been brought to their attention. Additionally, the CFDD interacts with the CAD through participation in the Food Advisory Committee.
- All Customs eC82 declarations are electronically forwarded to CFDD through an electronic platform between the Customs Asycuda and the TTBiz Link. It is mandatory for all importers to complete these import declarations forms and provide certain documents to the CED prior to the importation of goods into the country. The decision to release for sale or other decisions such as refused entry into the country are the responsibility of CFDD.
- The Ministry of Agriculture through its Animal Health Division (AHD) is responsible for ensuring that all food products from an animal origin such as meats, meat products and dairy products being imported into the country are free from diseases. It is therefore a requirement for the importer of these products to obtain import permits from the AHD prior to importation. Once the import permits are issued it is then uploaded on to the TT

Bizlink platform by the importer. CFDD conducts documentary review and evaluation of the said permit to determine the final decision regarding the approval to import.

- Additionally, the CFDD interacts with the Ministry of Agriculture through participation in the Food Advisory Committee.
- The CFDD held discussions with the CAD in 2015 with the aim of formulating a collaborative arrangement. However, this arrangement was not finalized. The draft Memorandum of Understanding that was prepared based on those discussions is included at **Appendix 1**.

The CCFD will collaborate with all related agencies to finalize the MOU with a final round of consultations.

d) Food products even if they are manufactured by small local producers, must be adequately labelled and sealed. The labels should indicate the amount of sugar, sodium and preservatives used in the product. Labelling of food products must be in English and the necessary laws and or regulations should be amended to reflect this.

Currently, there are labelling regulations for foods under the Food and Drugs Act. Section 16 of the Food and Drugs Regulations clearly stipulate the labelling requirements for all pre-packaged foods sold in Trinidad and Tobago. It also states that the declaration on the food label 'shall be made in English'. The Regulation also makes provision for both English and a foreign language in the case where the food is manufactured in a country where the national language is not English.

The Regulation requires the complete list of ingredients (e.g. Preservatives, sugar). However, there are no requirements, currently in the Food and Drugs Regulations for the declaration of nutrition facts such as the amount of sugar, sodium, calories and trans-fats on the label of a pre-packaged food product.

There is a draft revised food labelling regulation that is currently being reviewed by a sub-committee of the Food Advisory Committee. This draft food labelling regulation contains several additions to the current labelling regulations including the mandatory declaration of certain

allergens on all pre-packaged food labels. Enclosed is a copy of the draft revised food labelling regulations.

Nutritional facts (sugar, salt content) will be considered during this revision especially since it is required by the National strategic plan for the prevention and control of NCDs in keeping with the Regional (CARICOM) and International (SDG) initiatives for addressing NCDs. This plan takes into consideration a range of health interventions necessary to combat the prevalence of NCDs. One of these interventions is the promotion of healthy lifestyles through proper nutrition and diet.

e) The Ministry of Health within one (1) month of the presentation of this report should commence consultations with other relevant stakeholders with a view to formulating amendments to the Food and Drugs Act, which would make adequate provision, and provide a clear definition of the concept of food fraud, refine offences and ascribe penalties associated with food fraud and provide provisions for genetically modified organisms (GMOs).

There are continuing discussions pertaining to amendments to the Food and Drugs Act regarding penalties, offences and other issues. These discussions are held with members of the Food Advisory Committee. See details of the Amendments in **Appendix 2**.

f) In addition, there must be a regulatory framework to assess pesticide residue in fruit and vegetables.

The CFDD is responsible for the administration and enforcement of the Pesticides and Toxic Chemicals Act (P&TCA) and Regulations. This includes regulating pesticide formulations as well as regulating the use of pesticides in agriculture. In this regard, there are regulations for pesticide formulations, a CFDD Pesticide and Toxic Chemicals Inspectorate and a CFDD testing facility for the analysis of pesticide formulations (such as agro- chemicals) and analysis of certain pesticide residues in agricultural produce.

In an effort to strengthen/improve its regulatory function pertaining to pesticides, the CFDD requested and received technical assistance from the Delegation of the European Union for a project entitled ‘Technical Assistance in the Conduct of a Market Basket Survey for Pesticide Residues on Agricultural Produce in Trinidad and Tobago’. The Pesticide and Toxic Chemicals Board is reviewing the recommendations in the report on the provision of guidelines pertaining to establishing a regulatory framework to assess pesticide residues in fruits and vegetables. The following are the three main components required for the framework:

- Firstly, there are currently no specific regulations for the use of pesticides on agricultural produce under the Pesticides and Toxic Chemicals Act (P&TCA). The promulgation of these regulations under the P&TCA, include the acceptable levels of pesticide residues on agricultural produce. This is one component of the framework that is currently required to assess pesticide residues in fruits and vegetables.
- Secondly, the CFDD laboratory facility would require upgrading and the analysts require further training to enable the CFDD to conduct the full range of pesticide residue analyses for the types of pesticides that are present on agricultural produce in Trinidad and Tobago. The laboratory would also need to be accredited to ensure the reliability of pesticide residue testing results. This is the second component of the framework required to assess pesticide residues in fruits and vegetables.
- Thirdly, there is a need to strengthen the Pesticide and Toxic Chemicals Inspectorate of the CFDD to enable them to conduct the sampling of fruits and vegetables to be analysed by the laboratory. There are limited numbers of inspectors available to perform this role and there would be a need for additional persons to assist with the sampling. This could be accomplished through MOU’s with other government departments such as the Ministry of Agriculture.

g) The Ministry of Health in collaboration with the Consumer Affairs Division, pending the drafting and enactment of legislative provisions concerning food fraud, shall implement a public relations campaign for the purpose of alerting the public about detecting instances of food fraud and how to report apparent cases of food fraud.

The CFDD provides information pertaining to food fraud/food safety issues to stakeholders and members of the public. The following are the mechanisms used to alert the public/stakeholders about food fraud:

- The CFDD prepares brochures that provide information for the public about food fraud/food safety issues. Brochures such as ‘ Facts to Consider when Purchasing Food Products’ are available to ‘walk-in’ clients of the CFDD who visit the office to conduct business. These brochures are also distributed at exhibitions such as the 2015 and 2017 Trade and Investment Convention and seminars were done at the TIC to advise the public on the said requirements as promulgated under the respective Act and Regulations;
- The CFDD held a Supermarket Stakeholder Meeting in 2014 where cases of food fraud/food safety were highlighted to proprietors/employees of supermarkets and there are several outreach programmes with other agencies such as Export TT and IICA, Customs and Custom Brokers association; and
- The CFDD intends to partner with the Consumer Affairs Division (CAD) through a Memorandum of Understanding (MOU) to advise the public on matters related to food safety and to address complaints from consumers.

h) A Food Advisory Committee be established to set policies to encourage supply chain transparency and simplification. When the supply chain is transparent, upstream traceability is improved.

The composition and recommendations of the Food Advisory Committee (FAC) is currently before the Cabinet and the members are expected to be appointed for a three (3) year period. The Chairman of the FAC is the Chief Chemist and Director of Food and Drugs, and the Chemistry, Food and Drugs Division (CFDD) maintains the secretariat for the Committee.

The following are the sub-committees that are established to support the work of the FAC:

- Organic Foods Regulations
- Revised Food Labelling Regulations
- Revised Fish and Fishery Products Regulations
- Sugar and Sugar Products Regulations
- Revised Grain and Bakery Product Regulations
- Meat and Meat Products Regulations

Inherent in the Quality Management Programmes and Food Safety Programmes (e.g. HACCP, GMP) are elements of traceability. Manufacturers are expected to provide adequate information regarding source of material/ ingredients used in manufacturing during inspection by CFDD.

While a traceability system is not mandated in the current regulation, consideration should be given to include provisions for the implementation of a traceability system.

i) A food fraud management system be put in place as a mitigation strategy.

The implementation of a food fraud management system requires a multidisciplinary approach to food fraud. This includes strategies for prevention, detection and deterrent. Currently, the strategies employed for prevention, detection and deterrent of food fraud in Trinidad and Tobago are as follows:

A. Prevention Strategies:

1. Enforcement of food legislation
2. Inspection/import control of food at the ports of entry
3. Inspection and auditing at local manufacturing/processing plants
4. Food Recalls
4. Stakeholder/public awareness

B. Detection Strategies:

1. Laboratory analyses
2. Inspection/surveillance activities at food retail establishments
3. Investigation of food fraud/food safety complaints

C. Deterrent Strategies:

1. Warnings to proprietors
2. Seizure of food items

Addressing food fraud is highly complex and requires a range of activities on the part of a competent authority, including prevention, verification of fraudulent practices and enforcement. Uncovering fraudulent practices depends on communication and intelligence, strategic regulatory programmes, robust laboratory methodology and effective enforcement practices.

In light of the above, comprehensive research and consultations will be conducted on the scope and requirements of developing of a food fraud management system for T&T.

j) A supplier audit program be adopted, since it is one of the single best strategies for deterring economic adulteration.

Currently, the Veterinary Public Health Unit, only audits exporting plants as this is required for certification in keeping with the import requirements of the receiving country. CFDD conducts the inspection of local food manufacturers to determine compliance with the Food and Drug Act. Furthermore, local manufacturers are issued with a Certificate of Free Sale provided that they satisfy the requirements of CFDD and the Public Health Inspectorate.

A specific foreign supplier verification program has not been established and is not required by the Food and Drugs Act and Regulations. However, it should be noted that the FDA Food Safety Modernization Act (FSMA) has a Foreign Supplier Verification Program Rule. It stipulates importers to verify that the food they import into the US is produced in compliance with the

hazard analysis and risk based preventive controls and standards to meet the safety provisions of the FDA, is not adulterated and is not misbranded with respect to food allergen labeling.

It is recommended that a similar system be implemented in Trinidad and Tobago. This would involve a system of registration of imported foods and locally produced foods, whereby it would be a requirement for importers and manufacturers to institute a supplier verification programme. Amendments to the current Food and Drugs Act and Regulations are required to make provision for the mandatory registration of foods including imported and locally produced foods.

k) There must also be regular audits of customs approvals for food imports and quality controls of food manufacturing and food processing plants.

Currently the CFDD is utilizing the TTBiz Link online system in the following two (2) functional areas:

1. e-Goods declaration
2. Processing of export certificates

e-Goods declaration processing entails reviewing all relevant documentation regarding the importation of all Food, Drugs, Cosmetics and Devices online. Decisions relevant to each importation are also made online using the TTBizlink and ASYCUDA system.

This new electronic system which has the concept of Single Electronic System (SEW) allows both the importer and all government agencies to review all documentation including relevant certificates such as Health Certificates/ Free Sale Certificate/ Certificate of Analysis/Aflatoxin Certificate/ Notice of Approval for specific for drugs.

Decisions with respect to whether to allow entry of a food commodity into Trinidad and Tobago are made on the system which is transmitted directly to the importer or agent. This results in a reduction of processing time by at least 50%. Also, all agencies that have remit for a particular commodity can make decisions simultaneously which also contributes to increasing the efficiency at the ports without compromising the safety of the consumers. Another benefit of this

system is that it allows the agencies to electronically keep track of the shipment from the port to the company's warehouse.

1) The Ministry of Health should expedite and complete the implementation process of the Poultry & Poultry Products Specification as approved by the 35 COTED.

The Food Advisory Committee has agreed to the CROSQ Poultry and Poultry Products Specification being included in the Food and Drugs Regulations, First Schedule, Division 13 - Meat and Processed Meat. A responsibility and resources implementation plan has been developed with key agencies for the implementation, pending adoption of the Standard Specification for Poultry and Poultry Products (CRS28:2012). The details are as follows:

Section 1: Roles and Responsibilities

Chemistry Food Drugs Division (CFDD)

1. To certify and approve the packaging material and the packaging operations.
2. Approve the label to be used in marketing the poultry food products (*Definition : any food or article intended for human consumption which is prepared or derived in whole or in substantial part from any ready to cook poultry carcass or part thereof.*)
3. Inspectors shall inspect and ensure that the poultry and poultry products offered for sale to the consumer satisfies Section 10 of the CRS 28:2012.
4. To verify through document / certificate review that all imported poultry and poultry products are in compliance with the Food and Drugs Act and Regulations (Section 5 of the Act). Furthermore, the CFDD will take the responsibility to monitor and prevent entry of frozen poultry which exceeds six (6) months from the date of slaughter into the local market for human consumption.

Veterinary Public Health Unit (VPHU)

1. Inspection of processing facilities for risk based Food Safety Management Programme such as HACCP and good hygienic and Veterinary Public Health practices.
2. Certify processing plant categories as Category 1(Commercial processing facilities) and Category 2 (Other processing facilities).

3. Conduct antemortem and postmortem inspection of the birds in accordance with section 11 of CRS 28:2012.
4. Certify the Grading scheme as outlined in Section 5-7.3.8.2 CRS 28:2012.

Public Health Inspectorate (PHI)

1. Inspectors shall inspect and ensure that the poultry and poultry products offered for sale to the consumer satisfies Section 10 of the CRS 28:2012.

Section 2: Resource Requirements

Chemistry Food Drugs Division (CFDD)

1. Recruit three (3) additional Food and Drugs Inspectors.
2. Equipment – 5 digital/ Infrared thermometers.
3. Appropriate Personal Protective Equipment.

Veterinary Public Health Unit (VPHU)

1. Fill existing vacancies at the Veterinary Public Health Unit (8 vacancies, interviews and merit listing done since 2013).
2. Fill contractual post of Public Health Veterinarian (file currently with Permanent Secretary; all requirements met including recommendations made by PMCD).
3. Appropriate digital scale for water absorption testing.
4. Appointment of all inspectors under the Food and Drugs Act.

Public Health Inspectorate (PHI)

1. Fill all vacancies.
2. Provide 40 Infrared thermometers.
3. Provide at least 2 laptop computers for EACH County.
4. ALL Inspectors to be provided with suitable and adequate Personal Protective Equipment including hard hats, coveralls, non-skid, steel toe boots and Dust masks.

m) The Minister of Finance mandates the Customs and Excise Division, to release quarterly reports containing key information such as the tariff number, details of the shipment and other pertinent documents which the agency sees fit and which are consistent with international best practice. These reports will enhance transparency in the operation of C&E Division and may act as a check and balance as they would be subject to public scrutiny.

This recommendation pertains to the Customs and Excise Division.

n) The amendment of the Food and Drugs Act to include provisions which empower the Minister to make regulations for the direct application of approved international standards such as the Codex Alimentarius Commission or any other competent body.

The proposed amendment of the Food and Drugs Act under section 25 (1) (c) empowers the Minister to make regulations for the application of approved international standards such as the Codex Alimentarius.

o) Annual audits of manufacturing facilities must be performed by both Public Health Authorities and Veterinary Public Health (applicable to livestock and poultry processing facilities only). These audits are necessary in order to ensure manufacturing facilities are properly registered and comply with requirements for Export.

Currently, the Veterinary Public Health Unit conducts biannual audits of all facilities (milk and meat) that are involved in export. The Public Health Inspectorate issues certification of registration for the premises as required by law. During the period 2014-2016, approximately 50 audits were conducted.

p) Fixed standards for food products must regulate the production and processing of food and there must be mechanisms in place to ensure compliance. This has the potential to enhance our competitiveness in foreign markets.

CFDD participates in the development process of CROSQ and CODEX food standards. Most recently, the Food Advisory Committee reviewed and recommended the adoption of the CARICOM Regional Standards for Poultry and Poultry Products (CRS28:2012). The CFDD would ensure compliance with Standards by using the inspection checklist developed and the requirements of the Food and Drug Regulations.

q) The establishment of an operational and certified food testing laboratory at the Chemistry Food and Drugs Division (CFDD) for the purpose of testing products suspected of food fraud or any other seized products that may be unfit for human consumption.

The CFDD has two main laboratories involved in the analysis of food products. They are the Food Microbiology and the Food Chemistry Laboratories. Both laboratories conduct a broad range of analyses on several categories of foods to determine compliance with the Food and Drugs Act and Regulations.

The following are the plans to ensure that the food chemistry and microbiology laboratories are operational and certified:

- The repairs to the laboratories are being completed and thereafter, there should be full compliance with the requirements of the Occupational Safety and Health Act;
- Equipment utilized by the laboratories will be serviced and calibrated to ensure it is functional;
- The necessary chemicals and other consumables required for the laboratory analyses will be acquired prior to the completion of repairs to the laboratories;
- All the test methods utilized in the laboratories would need to be validated prior to the resumption of laboratory testing; and

- Once the laboratories are operational, measures will be adopted to continue the implementation of a laboratory quality management system in preparation for accreditation.

r) With respect to the renovation of the CFDD's laboratory facilities, we recommend that:

i. The Ministry prioritize the renovation of the laboratory. The Ministry of Health must provide Parliament with an update on the status of the works on the lab within four (4) months following the presentation of this report.

The Ministry has commenced the various works at the laboratory with the percentage completed to date and the proposed completion date as follows:

- Exterior refurbishment works, inclusive of construction of security booth - 85% completed, and to be completed by August 17, 2017;
- Interior refurbishment works - 30% completed, and to be completed by September 30, 2017;
- Plumbing and Gas lines installation - 50% completed, and to be completed by September 30, 2017; and
- Supply and installation of Laboratory cabinets and benches for two (2) laboratories. To date, five (5) out of seven (7) laboratories will be operational by the end of the 2017 fiscal year and the additional two (2) laboratories within the next fiscal year 2018.

ii. The necessary Health and Safety systems must be installed in the building. This should include fire suppression systems and fire escapes.

Prior to commencement of operations, the Trinidad and Tobago Fire Service and the OSH Agency recommendations for the facility will be implemented.

iii. Given the generally poor conditions of the building designated as the laboratory of the CFDD, the renovation should be considered an interim resolution. It is recommended that a modern facility be identified to house the test labs of the CFDD.

It is proposed that CFDD will in time be located at the National Public Health Laboratories in Valsayn.

s) The old building which housed the Chemistry and Food and Drugs Laboratory and which is currently being refurbished seems to be unsuited for its purpose. Its location makes it difficult to access for the majority of the population. The length of time for which this Division which falls under the Ministry of Health, has been inoperative is unacceptable. The site visit to CARIRI highlighted the high standard of the Institute's facilities. As such, consideration should be given to collaboration with CARIRI to ensure that tests which are necessary to ensure that public health and safety issues are prioritized and are done in a regulated and professional environment.

Currently, there is a contractual arrangement between the CFDD and CARIRI pertaining to testing of imported food products. This arrangement involves sampling by the CFDD of imported food products and submission of these samples to CARIRI for testing. The test results provided by CARIRI are used by the CFDD together with other certificates as the basis for the decision to release the shipment of food products for sale or refused entry. This arrangement is based on a contract awarded by the Ministry of Health to CARIRI to provide these testing services during the period when the CFDD laboratories are being refurbished.

Additionally, clients requesting approval of locally manufactured food products for sale are required to have their products tested at CARIRI and to submit the certificate of analysis/test report to the CFDD. The CFDD would base its decision regarding approval of the food products on the CARIRI report. These clients are required to pay CARIRI the costs for these testing services.

However, these arrangements are only temporary until the completion of the repairs of the CFDD laboratories. Once the repair work is completed, the CFDD would resume testing of

samples of both imported and locally manufactured food products. The continuation of the current temporary arrangement between CARIRI and the CFDD would require the government to provide funding to CARIRI for the testing services.

t) Given the costs associated with acquiring the technical services of CARIRI consideration should be given to providing a financial facility to assist farmers or small business owners in paying for tests at CARIRI.

There are many laboratories such as the Faculty of Medical Sciences, Veterinary Public Health and Food Safety Laboratory that are more cost effective than CARIRI and some of these are currently being utilized by the industry. Many cheaper, quick test methodologies are available now for use in the industry rather than the traditional isolation methods being used by CARIRI.

Many of the processors that are exporting are using such technologies and the implementation of quality assurance programs such as HACCP has replaced the need for doing a large number of sampling of end of the line products and this is the current trend that should be encouraged. Alternatively, the Agriculture Development Bank (ADB), ExportTT and the Ministry of Labour may have facilities to provide financial assistance to farmers and small business owners to cover the cost of testing.

u) Given that only twenty (20) percent of imports are scrutinized at our ports of entry, spot checks at retail outlets or groceries and other places where imported packaged foods items are sold is imperative.

Currently both the Public Health Inspectorate and the Food and Drugs Inspectors are conducting supermarket inspections in Trinidad as part of their work programme for the fiscal year 2017. Due to insufficient numbers of Food and Drugs Inspectors, inspections are alternated between supermarket and pharmacy inspections.

The Veterinary Public Health Unit also conducts market surveillance of meat and meat products including poultry at supermarkets. However, because of the Unit's limited legal authority to

enforce seizures and compliance these activities are done in conjunction with the CFDD when infractions are picked up.

To strengthen these current activities, priority should be given to the overall improvement of Human Resource capacity in the filling of vacancies and training of officers to detect infringements. Consideration should be given to increasing administrative fines as a supporting deterrent strategy.

v) Consideration should be given to mandating the Trinidad and Tobago Bureau of Standards as the official inspectorate for food products.

Food safety is a public health issue and therefore the inspection of food products should be performed by a public health institution. The CFDD has the primary mandate of safeguarding public health and therefore it should be allowed to continue this function as the inspectorate for food products. The CFDD would however require additional resources to execute its functions more efficiently. There is a draft memorandum with the subject 'Relocation of the CFDD to Ministry Trade' that provides a strong justification for the CFDD to remain as the competent authority for the regulation of Food, Drugs, Cosmetics and Devices. These details are shown in **Appendix 3.**

w) The public must be alerted in a timely manner about products which are found to be unsuitable for human consumption.

Food Regulatory Agencies such as the U.S. Food and Drug Administration and European Food Safety Authority, Food Alert Networks such as INFOSAN and Food Manufacturers submit information or notifications about food recalls to the Chemistry, Food and Drugs Division (CFDD). A media release is prepared by the Corporate Communications Unit of the Ministry of Health for dissemination to the public.

The information pertaining to product recall of these products should be provided to the public to alert them of the unsuitable products in the market. This can be a practice of the CFDD that would assist in alerting the public in a timely manner about unsuitable products.

x) As food manufacturing technology is constantly evolving, the training of staff of the CFDD must keep pace with these advancements. As such, it is recommended that arrangements be made to expose chemists and biologists of the CFDD to the most up-to-date training opportunities. In this regard, collaborations with CARIRI should be explored.

Training has been conducted in the past for Chemists at the CFDD. The most recent training was done in November 2016. This involved training for one Chemist in fishery products testing. The training was done through a regional programme that was sponsored by the European Union and implemented by the Inter-American Institute for Cooperation on Agriculture (IICA). This regional training programme also included a training module for a Food and Drugs inspector in modern approaches to fish inspection and sampling.

Additionally, a Chemist and Microbiologist from the CFDD participated in a workshop entitled “Detection Methods for Genetically Modified Organisms (GMOs) in the Food Chain”. This training was conducted in February 2015 by the American Association of Cereal Chemists International (AACCI) and organized by the University of the West Indies (UWI).

The CFDD also received technical assistance from the Delegation of the European Union in a project entitled ‘Conduct of a Market Basket Survey for Pesticide Residues on Agricultural Produce sold in Trinidad and Tobago’. The workshops held during this project exposed chemists, other laboratory personnel and inspectors from the CFDD to best practices used for the control of pesticide residues on agricultural produce. The CFDD continues to maintain linkages with international organizations such as PAHO, FAO, IICA and other reputable organizations such as United States Department of Agriculture (USDA) and Delegation of the European Union in an effort to obtain up-to-date training opportunities.

y) Inter-agency collaboration must be fortified through constant information sharing and the use of ICT.

One of the IT platforms in place to support and improve collaboration, coordination and the sharing/management of information for import clearance of goods is the TTBizLink platform. The TTBizLink e-Goods Declaration Module allows traders/importers to receive electronic endorsements for their imported cargo from other regulatory agencies involved in border control. The agencies utilizing the TTBizLink e-Goods Declaration Module are the Trade Licence Unit of the Ministry of Trade and Industry; the Food and Drug Inspectorate and the Pesticides and Toxic Chemicals Inspectorate of the Chemistry, Food and Drugs Division, Ministry of Health; the Plant Quarantine Service of the Ministry of Agriculture, Land and Fisheries; and the Trinidad and Tobago Bureau of Standards.

First, Customs Border Control System (CBCS) transmits a data set to TTBizLink in accordance with Section 279 of the Customs Act, Chap 78:01. This data set contains the relevant information from the trader/importer pertaining to the application to import the goods. This information including the import declaration or e-C82 form, accompanying documents such as the commercial invoice, certificates and import permits are then examined by the relevant regulatory agencies and each endorsement provided by an agency in TTBizLink is automatically and instantaneously transmitted to the CBCS.

The Food and Drugs Inspectorate can also refer specific commodities to other agencies such as Plant Quarantine Services, Pesticides and Toxic Chemicals and to other offline agencies. Furthermore, there is a Risk Management tool built in to the e-Goods Declaration Module that allows agencies to create risk profiles based on parameters contained in the e-C82 declaration data set and agencies can share these risk profiles amongst each other.

One of the activities to strengthen the TTBiz link system is the development and implementation of a new risk management tool that is more robust and flexible so as to allow the border agencies including Customs and Excise Division to collaborate, coordinate and share/manage information more efficiently and effectively.

Further, links can be established with other Ministries using the iGovtt platform.

z) Training of Inspectors on how to deal with detected contraventions of the Act so as to increase prosecutions and ensure that offending items are not simply returned to shelves.

Food and Drugs Inspectors (FDI) are responsible for enforcing the Food and Drugs Act and Regulations. During an inspection the FDI may determine that an item (food, drug, medical device, cosmetic) is in contravention of the Food and Drugs legislation based on visual examination and/or from the results of laboratory analyses. If the item that is being offered for sale contravenes any provision of the Food and Drugs legislation then a FDI has the authority to seize the item(s).

During this process, a seizure form is completed with information pertaining to the details of the item, the premises and the name of the proprietor or person offering the item for sale. The proprietor/person offering the item for sale is required to sign the duplicate of the form. The person/proprietor is also issued a warning letter.

Based on the number items being seized, the inspector may physically remove all the seized items from the premises or he may place a seizure tags on the items and return subsequently to remove the items. The seizure tag that is placed on the items clearly states that it is an offence to remove, alter or interfere with any article seized without the authority of an inspector. The items that are removed from the premises are stored at the CFDD and subsequently destroyed/sent for disposal.

The CFDD can employ this strategy of forwarding information pertaining to the seizure of products to the Ministry of Health's Legal Unit in an effort to:

- seek advice regarding methodologies for dealing with contraventions to the Food and Drugs Act and Regulations so as to increase prosecutions; and
- where possible, begin prosecutions of persons involved in the sale of items that contravene the Food and Drugs Act and Regulations.