



Government of the Republic of Trinidad and Tobago
Ministry of Health

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September 13, 2018

Mr. Brian Caesar
Clerk of the House (Ag.)
Public Accounts Committee
Level G-9 Tower D,
International Waterfront Centre
1A Wrightson Road
Port-of-Spain

Dear Mr. Caesar,

Re: 17th Report of the Public Accounts Committee on the Examination of the Audited Financial Statements of the Trinidad and Tobago Bureau of Standards for the financial years 2009 to 2013

Kindly find the enclosed written response to the findings and recommendations of this Ministry in regards to the 17th Report of the Public Accounts Committee on the Examination of the Audited Financial Statements of the Trinidad and Tobago Bureau of Standards for the financial years 2009 to 2013. Kindly accept my apologies for the late submission.

Respectfully,


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Permanent Secretary
Ministry of Health

Ministry of Health

Question4: Written Response to the Need for a Single Standards

Coordinating Agency

Recommendation: The TTBS,MTI and MOH in collaboration with the Ministry of the Attorney General and Legal Affairs should take the requisite steps to determine the best possible option available for assignment of food and drug standards responsibility given international best practice and our local circumstances.

In Trinidad and Tobago, there are two separate organizations that develop, promote and enforce standards, namely; the Trinidad and Tobago Bureau of Standards (TTBS), Ministry of Trade and Industry and the Chemistry, Food and Drugs Division (CFDD), Ministry of Health.

In the first instance, the mandate of the TTBS is to develop, promote and enforce standards (except for food , drugs, cosmetics, medical devices and pesticides) in order to improve the quality and performance of goods produced or used in Trinidad and Tobago. It has the statutory responsibility for the quality of goods and services which are subject to trade in Trinidad and Tobago.

Secondly, the CFDD of the Ministry of Health has the legal mandate to regulate Food, Drugs, Cosmetics, Devices (Medical), Pesticides and Toxic Chemicals as promulgated under the Food and Drugs Act and Regulation and Pesticides Toxic Chemicals Act and Regulations. Standards for food, drugs, cosmetics, medical devices, pesticides and toxic chemicals are inherent in the regulations enforced by the CFDD.

The creation of a single standards agency would require the establishment of an agency with the mandates of both the CFDD and TTBS. However, the CFDD does not support the establishment of a Single Standards Agency for the following reasons:

1. The CFDD under the Ministry of Health is aligned to international organizations such as the WHO and FAO and focuses on safeguarding and promoting public health while the TTBS under the Ministry of Trade and Industry is aligned to the WTO and focuses on improving the quality of goods and services for trade.
2. The stated position of the WHO is that food, drugs, cosmetics and medical devices should be regulated together because of the linkages in the health system. Trinidad and Tobago is in alignment with this as the Food and Drugs Act which covers food, drugs, cosmetics and (medical) devices. Legislation for food and drugs is in keeping with international best practice and with the provisions in developed countries like the U.S, Canada, United Kingdom, Australia and the European Union.
3. The epidemiological surveillance and response to outbreak of illnesses in relation to food safety is an essential public health function of the Ministry of Health. In the event of a disease outbreak the health sector must rapidly mobilize and activate its resources and emergency system. The present food safety system of prevention, monitoring and emergency mobilization facilitates its emergency response as they all reside within one Ministry, the Ministry of Health. In the event of an outbreak, the CFDD in coordination with other Divisions of the Ministry of Health have the necessary competencies to manage the outbreak. The responsibility for food control should remain under the Ministry of Health and not with an independent single standards agency or with an agency under the Ministry of Trade and Industry.
4. The regulation of pharmaceuticals is also integral to public health. The standards as it pertains to pharmaceuticals are inherent in the drug regulations that are enforced by the CFDD. There are linkages that exist within the Ministry of Health pertaining to pharmaceutical regulation and therefore the responsibility for the enforcement of pharmaceutical standards/regulations should remain under the Ministry of Health and not with an independent single standards agency or with an agency under the Ministry of Trade and Industry.

5. Under the Food and Drugs Act, the CFDD is responsible for managing the Food Advisory and Drug Advisory Committees, which advise the Minister on standards and other matters pertaining to food, drugs and cosmetics. Both Committees consist of a broad range of professional and have been active in advising on standards/ regulations and making technical decisions pertaining to the approval/withdrawals of food and pharmaceuticals from the market. Therefore, the capability for standards/regulation development of food, drugs, and cosmetics already exists under the CFDD of the Ministry of Health and there is no need for an independent single standards agency to perform this role.
6. As a member of the FAO, Trinidad and Tobago actively participates in the work of the international food standards setting body known as Codex Alimentarius. The CFDD is recognized as the National Codex Contact Point for Trinidad and Tobago and in this regard the CFDD coordinates all activities pertaining to Codex in Trinidad and Tobago. The involvement of CFDD in Codex activities assists in the strengthening of Trinidad and Tobago's food control system. It is therefore not necessary to establish a single standards agency to perform this role.

The need for the establishment of a Single Standards Agency for the development and enforcement of standards/regulations for food, drugs, cosmetics, medical devices, pesticides and toxic chemicals is not required at this time in Trinidad and Tobago.

It is recommended that the CFDD be strengthened in function and capacity to deliver its mandate with supporting resources, provide for the adoption of the National Food Safety Policy and facilitate amendments to the Food and Drugs Act in order to allow for the improvement of the regulation of food, drugs, medical devices, cosmetics, pesticides and toxic chemicals.

Question 5: Written Response to Voluntary Standards at Medical Laboratories

Recommendation: The Ministry of Health in collaboration with the TTBS should take the requisite steps to accredit all medical, chemical and testing laboratories in Trinidad and Tobago and submit a report on the initiatives taken by August 30, 2018.

The Trinidad and Tobago Bureau of Standards (TTBS) has voluntary standards that are available for all medical laboratories to be certified. Since the standards are voluntary, they are not enforced by law, but they can be used by organizations at their discretion. This gives rise to the issue of participation because it is costly to gain accreditation.

In the interim, the Ministry of Health is currently developing a draft strategic plan and policy for the Licensing of Medical Laboratory and Registering Medical Laboratory Practitioners.