

Outcomes of the STDF-UNIDO-IICA Survey on voluntary third-party assurance



UNITED NATIONS
INDUSTRIAL DEVELOPMENT ORGANIZATION



STANDARDS *and* TRADE
DEVELOPMENT FACILITY

SUMMARY REPORT OF RESPONSES TO STDF/UNIDO/IICA VOLUNTARY THIRD-PARTY ASSURANCE (vTPA) SURVEY

Disclaimer

This report reflects the responses to an online STDF/UNIDO/IICA survey. It does not necessarily represent the views of the STDF, UNIDO or IICA, or other partners and members of the STDF.

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ACRONYMS

BRC	British Retail Consortium
CA	Competent Authority
CBs	Certification Bodies
CCFICS	Codex Committee on Food Import and Export Inspection and Certification Systems
CPOs	Certificate Programme Owners
FBO	Food-Business Operator
FSA	Food Safety Authority
GAPs	Good Agricultural Practices
GFSI	Global Food Safety Initiative
GHPs	Good Hygiene Practices
GMPs	Good Manufacturing Practices
HACCP	Hazard Analysis and Critical Control Points
IAF	International Accreditation Forum
IICA	Inter-American Institute for Cooperation on Agriculture
ISO	International Organization for Standardization
LAs	Local Authorities
LDCs	Least Developed Countries
MLA	Multilateral Recognition Arrangement
PPPs	Public Private Partnerships
SCS	Self-Checking Systems
SOPs	Standard Operating Procedures
SPS	Sanitary and Phytosanitary
SQF	Safe Quality Food
STDF	Standards and Trade Development Facility
UNIDO	United Nations Industrial Development Organization
UK	United Kingdom
vTPA	Voluntary Third-Party Assurance
WTO	World Trade Organization

EXECUTIVE SUMMARY

1. Voluntary TPA (vTPA) programmes are defined as "a non-governmental or autonomous scheme comprising of the ownership of a standard that utilizes national/international requirements; a governance structure for certification and enforcement, and in which food-business operator (FBO) participation is voluntary" (CX/FICS 18/24/6). They include quality assurance schemes which aim to improve the safety of food products, including private certification schemes, prerequisite programmes, official and corporate internal food safety schemes. Over recent years, food safety authorities in some countries are already making use of data from vTPA programmes to inform risk profiling of food businesses, improve risk-based inspection and more effectively target and spend public resources. In these cases, vTPA programmes are seen as a tool to help improve the effectiveness of competent authority oversight through a co-regulatory setup (where they do not replace this control, and public and private sector responsibilities remain strictly separate).
2. The Standards and Trade Development Facility (STDF), in collaboration with the United Nations Industrial Development Organization (UNIDO) and Inter-American Institute for Cooperation on Agriculture (IICA), conducted an online survey on the use of vTPA programmes (see Annex 1). The aim was to increase understanding of existing and/or planned regulatory frameworks and practices related to voluntary third-party assurance (vTPA) programmes (including quality management systems, assurance schemes or certification programmes) in food and feed safety.
3. The survey is linked to ongoing regional pilot projects by the STDF to pilot the use of vTPA programmes in [Africa](#) and [Central America](#), and complementary work by UNIDO in other countries. It incorporated some questions from a survey on food safety governance by Dr Tetty Havinga ([Radboud University](#)), and was reviewed by STDF partners and other experts involved in CCFICS work prior to finalization.
4. A link to the survey (in English, French, Spanish) was distributed through the WTO SPS and Codex e-mail lists in February 2020. Follow-up reminders were shared and the survey remained open until June 2020. UNIDO distributed an Arabic version of the survey to countries involved in the [SAFE programme](#). The survey was completed fully by 64 officials of competent authorities and their representations based in 47 countries/territories, including 18 developed countries and 29 developing countries (including 7 LDCs). In addition, 29 other officials completed only parts of the survey; these incomplete responses are not reflected in the analysis.
5. Key findings from the survey include the following:

Awareness and use of vTPA programmes

- i. Out of 64 respondents, 15 authorities are applying the vTPA approach at different levels and have formulated strategies and policies referring to vTPA programmes. 24 respondents reported that their authority is using information obtained from vTPA programmes in some way, though not all have related policies and/or legal frameworks in place. A further 24 respondents highlighted the interest of their authority to consider use of vTPA programmes in the future to complement and support their food control system.
- ii. vTPA programmes that are used, recognized and/or taken into account mainly cover manufacturing and primary production, closely followed by others. The most frequently used programmes in food manufacturing are ones recognized by the Global Food Safety Initiative (GFSI) or internal assurance systems. Participation in these programmes is mainly recognized through adapted frequency and/or scope of inspections.
- iii. The majority of respondents (75%+) see advantages of government cooperation with vTPA programmes. Reported benefits included: overall improvements in food hygiene and safety (49), more efficient allocation of time resources during inspections, allowing official controls to focus on what is considered as higher risks (48). Over half of the survey respondents also highlighted the opportunity for vTPA programmes to support food business operators to comply with food safety regulations.
- iv. Roughly half of respondents raised some concerns with this type of cooperation. Concerns raised focused on: possible additional financial costs for food business operators (33 responses); the confidentiality of private audit reports (26 responses), as well as reliability of private assurance systems (23), regulatory capture and duplication of existing laws and regulations (24).
- v. Adequacy of practices in voluntary audits and the reliability of the data generated by vTPA programmes are mainly assessed and ensured through legal requirements and revision of

- vTPA governance structure, and less by the competency of auditors working for private certification bodies.
- vi. Countries mostly consider the governance structure of vTPA programmes and the alignment with their legal requirements as methods or criteria for ensuring the reliability of data generated by vTPA programmes.

Operational aspects related to the assessment, recognition and/or use of vTPA programmes

- i. The survey revealed that the vast majority of regulators (93%) require FBOs to register with a national government authority before they commence operations. 72% of respondents indicated that the competent authorities conduct an initial inspection before approving FBOs. Less than half of respondents (44%) ask for and receive information about FBOs from certification bodies.¹
- ii. The main prerequisites for the use of the vTPA approach by governments include: i) use of vTPA programmes by FBOs at the country level, which reflects regulatory and buyer requirements; ii) the existence of national quality infrastructure that is internationally recognized to ensure trust in data from auditors; and iii) legal and operational capability (including relevant policies, strategies and legislation, as well as IT systems) regarding data privacy and ownership of regulators to collect, store and analyze data received in a secure and moral way.
- iii. Although around 66% of the surveyed cited they do not subcontract third parties to conduct inspection services on their behalf, 17% of the same sample assumed they are planning this for the future.²
- iv. Authorities that subcontract third parties to carry out food safety inspections on their behalf indicated their service provider must be accredited nationally;
- v. Only half of these authorities assumed the service provider shall be accredited by a national Accreditation Body which is a signatory to the International Accreditation Forum (IAF) or recognized regional groupings of Accreditation Bodies, through the Multilateral Recognition Arrangement (MLA).
- vi. Areas, where organizations subcontract external/third parties to conduct inspection services, include more inspection of food manufacturers, food business and food facilities, as well as export, import, border and port inspection, and less inspection of hospitality providers.

Data sharing, assessment and recognition of vTPA

- i. Among those 24 authorities identified in the first item (awareness and use of vTPAs), 19 receive information from vTPA programmes and certification bodies. The type of information received includes mostly names of participant FBOs, information on threat to public health and food safety, as well as major nonconformities and details on remedial actions.
- ii. In contrast, only 15 authorities indicated they currently share information with vTPA programmes owners and certification bodies, which concerns mainly food safety trends, challenges or systemic problems identified through inspections, names of certified food businesses found non-compliant as well as information indicating possible serious threat for public health and food safety.
- iii. Most authorities which are currently receiving information from third parties rely on a formal arrangement for the data sharing and have data privacy regulations in place in their countries. Most respondents that are not using the vTPA approach and do not have strategies and policies referring to vTPA programmes in place also indicated their country have a data privacy national law. Feedback on data sharing raised concerns regarding data privacy, with some respondents highlighting the need for data protection and confidentiality of reports to be regulated.
- iv. The survey explored practices and experiences related to the assessment and/or recognition of vTPA programmes by food safety regulatory authorities. It showed that responses point to a less than ideal set-up or practice within countries for ensuring the integrity and trustworthiness of data generated by vTPA programmes. In the best-case scenario, several parameters were cumulatively met, including:
 - having a national accreditation body, which is affiliated to the IAF and/or a regional body;

¹ Based on the information provided by 61 respondents.

² Based on the information provided by 61 respondents.

- awareness of regulators about the activities undertaken by certification bodies;
- registration of certification bodies with competent authorities;
- information from certification bodies provided to regulatory authorities on audited food business operators and their non-conformities; and
- nonconformity follow-up provided by certification bodies/competent authorities.

Only seven respondents (out of 58) responded positively to all these parameters, which points to an overall weak relationship between competent authorities and certification bodies in the majority of cases.

- v. Finally, the survey examined practices related to measures or consequences for certification bodies or vTPA programme owners that fail to provide adequate assurances on the compliance of FBOs. Half of respondents indicated that there are consequences, which include measures defined in an official document).

INTRODUCTION

1. This report describes and analyses the findings of a survey on the use of voluntary third-party assurance (vTPA) programmes carried out by STDF, together with UNIDO and IICA. Codex has defined a vTPA programme as "a non-governmental or autonomous scheme compromising of the ownership of a standard that utilizes national/international requirements; a governance structure for certification and enforcement, and in which food-business operator (FBO) participation is voluntary" (CX/FICS 18/24/6). The vTPA approach is enabled through the Codex Principles and Guidelines for National Food Control Systems (CAC GL 82-2013), which states that "where quality assurance systems are used by food business operators, the national food control system should take them into account where such systems relate to protecting consumer health and ensuring fair practices in the food trade" (para 54). It is conceptually linked to the Codex Principles and Guidelines for Monitoring the Performance of National Food Control Systems (CXG 91-2017).

2. There is a considerable variety in vTPA programmes, which cover quality assurance schemes, official and corporate food safety programmes, prerequisite programmes and private certification schemes. Some food safety authorities cooperate with vTPA programme owners to complement and support their national food control system. They are making use of reliable data and information from vTPA programmes to inform risk profiling of food businesses, improve risk-based inspection and more effectively target resources. Reflecting this trend and interest, the Codex Committee on Food Import Inspection and Certification Systems (CCFICS) is developing principles and guidelines for the assessment and use of voluntary third-party assurance programmes.

3. This survey aimed to increase understanding of existing and/or planned regulatory frameworks and practices related to vTPA programmes (including quality management systems, assurance schemes or certification programmes) in food and feed safety. It is linked to STDF's knowledge work on [Public-Private Partnerships \(PPPs\)](#) and STDF regional projects to pilot the use of vTPA programmes in [West Africa](#) and [Central America](#), as well as vTPA work supported by UNIDO's in the Arab region and COMESA.

4. Following a brief overview of the survey's development, dissemination and responses received, the key findings are presented. The findings and analysis are structured as follows: (i) awareness and use of vTPAs; (ii) operational aspects; and (iii) data sharing, assessment and recognition of vTPAs.

SURVEY DEVELOPMENT, DISTRIBUTION & RESPONSES RECEIVED

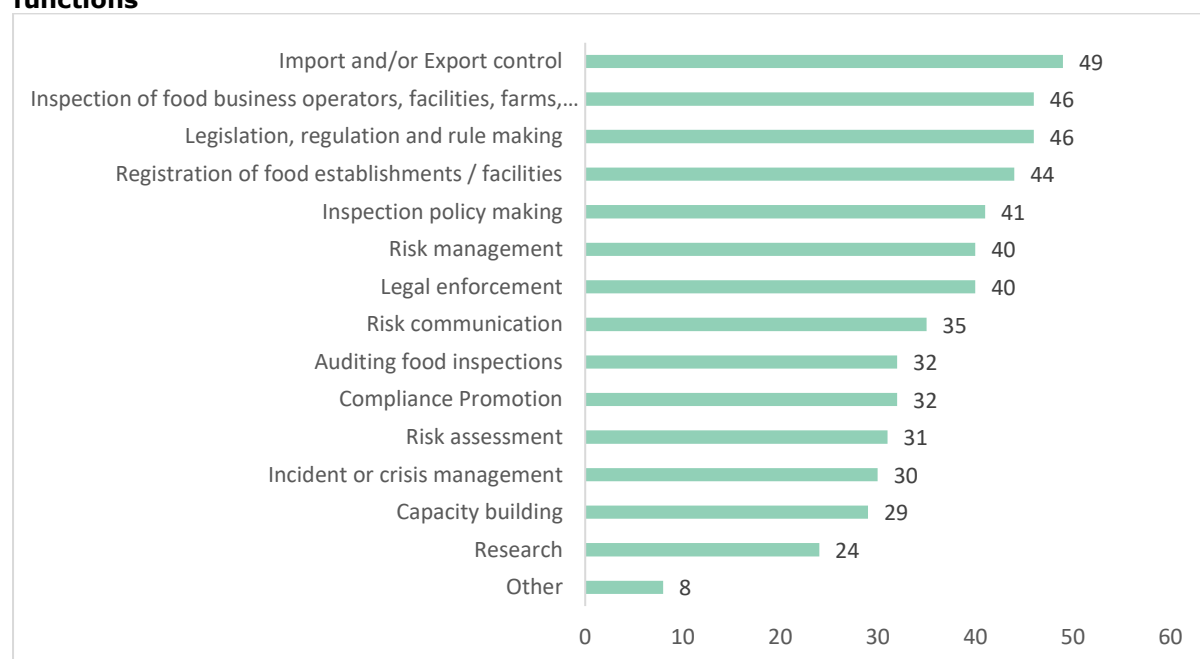
5. The survey was developed by the STDF Secretariat with UNIDO, IICA and other partners including food safety regulators (Canada and the UK) involved in the ongoing CCFICS work on vTPAs. It included a mix of multiple-choice, ranking and open-ended questions. Some questions from a previous survey on food safety governance by Dr Tetty Havinga ([Radboud University](#)) were incorporated to facilitate comparison of trends over time.³ To encourage responses from developing as well as developed countries, the number of questions was kept to a minimum.

6. The STDF Secretariat, WTO SPS unit, Codex Secretariat and UNIDO distributed a link to the online survey (in English, French, Spanish and Arabic). A total of 93 responses (complete and incomplete) were received. This report analyses complete responses received from 64 officials in government authorities in 47 countries/territories including 18 developed countries and 29 developing countries (of which seven Least Developing Countries). Most surveys were completed in English (37), followed by Spanish (10), Arabic (9) and French (8). The relatively high share of responses from developing countries compares to a more limited response from developing countries to the survey by T. Havinga (which obtained information from 41 countries, including 25 European countries, eight other developed countries and eight developing countries).

7. Responses were requested from officials working for food safety authorities. Figure 1 illustrates the diverse areas of work covered by the organizations of the respondents. These include Import and/or Export control (49), Inspection of food business operators (46), Legislation, regulation and rulemaking (46), Registration of food establishments (44), Inspection policy making (41), etc.

³ The report of the survey by T. Havinga is available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3347666

Figure 1: Survey respondents work for food safety authorities responsible for multiple functions⁴



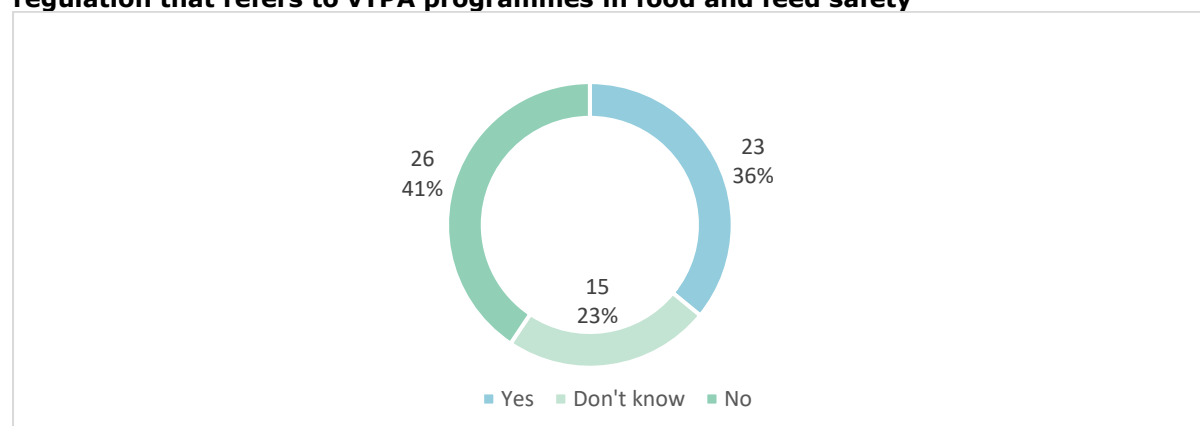
1. AWARENESS AND USE OF vTPA

8. The findings show that 15 authorities are using the vTPA approach to some extent and already have strategies and policies referring to vTPA programmes in place. From other countries (24) that are not currently using the vTPA approach but have an interest to do so, five have some kind of policy, regulatory or legal frameworks towards that interest in place.

9. As per good regulatory practices, food safety regulators should follow specific preparatory steps before such regulatory application is deployed. This would ensure the integrity and increase the possibility of positive outcomes, benefiting all stakeholders. 15 respondents were not able to answer these questions, which could be linked to the general awareness of the domain or the new nature of the vTPA acronym.

10. Figure 2 shows that only 36% of the respondents are aware of a national policy, strategy or regulation related to vTPA programmes in food and feed safety in their country (being 45% from developed countries and 55% from developing countries). From those who answered no (41%), 31% were from developed countries while 69% were from developing countries.

Figure 2: Awareness of existing national government policy, strategy, legislation or regulation that refers to vTPA programmes in food and feed safety⁵



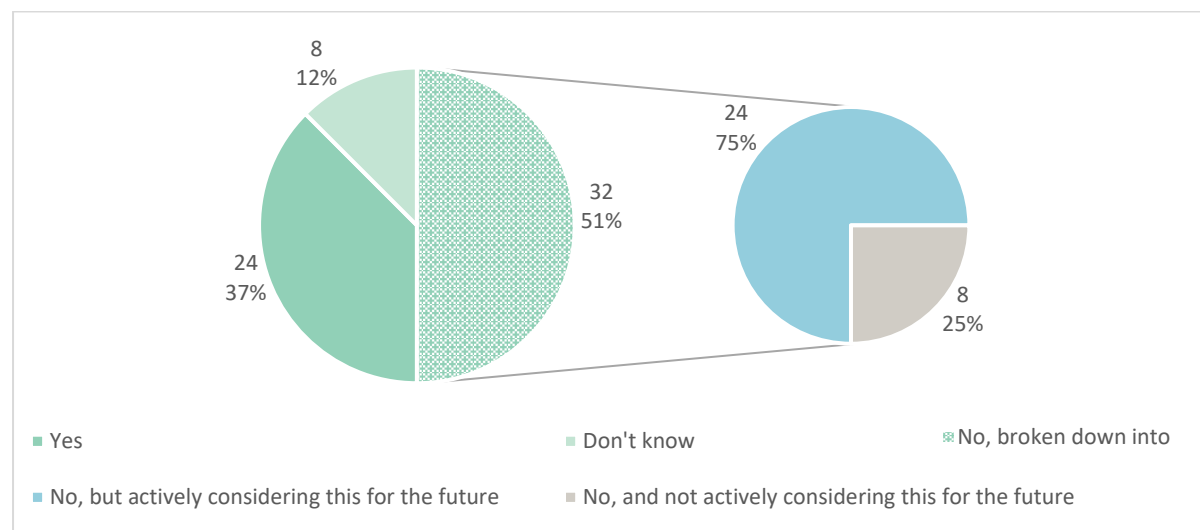
⁴ Based on the information provided by 64 respondents.

⁵ Based on the information provided by 64 respondents.

11. Figure 3 illustrates that 37% of respondents to the survey considered that their organization recognizes, takes account of and/or uses information from vTPA programmes to inform and/or support its national food control system.

12. Of the 32 respondents (51%) who replied that their organization does not recognize, take into account of use vTPA programmes, the majority (75%) indicated they were actively considering this for the future.

Figure 3: Recognition, consideration and/or use information from vTPA programmes⁶



13. Respondents were asked to rank the reasons driving their organizations to recognize and/or make use of vTPA programmes (Table 1). Less than half (25) of respondents provided an answer to this question. This may reflect limited overall knowledge on the existence, practical use and benefits of the vTPA approach to achieve food safety objectives, or an inability to rank the different factors.

Table 1: Factors pushing authorities to recognize, take account of and/or use vTPA programmes⁷

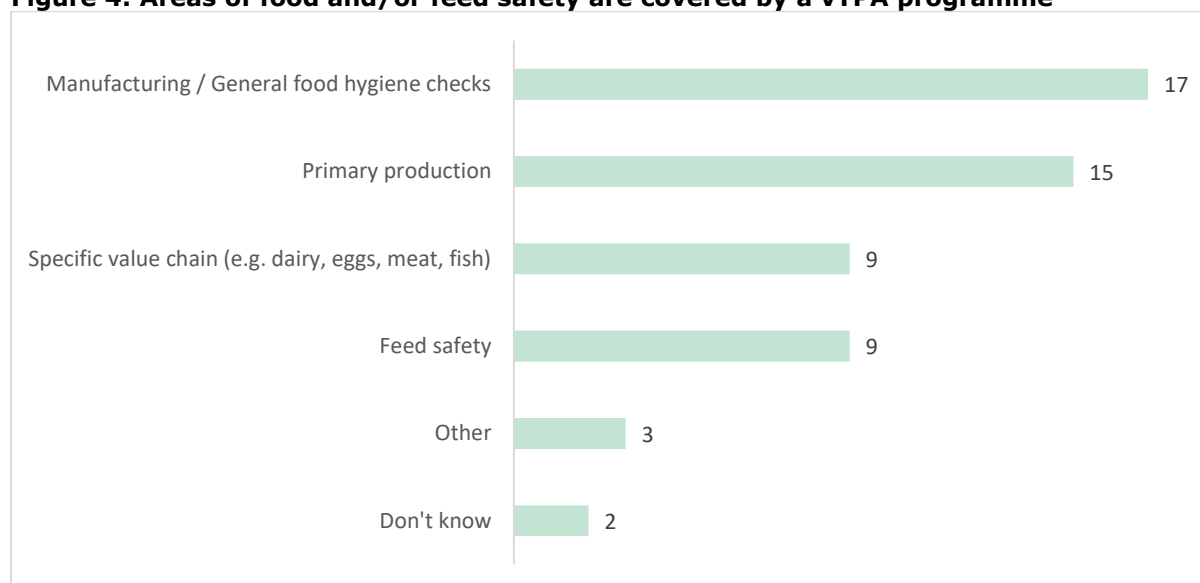
Why does your organization recognize, take account of and/or use vTPA programmes?	Ranking
Contributes to compliance with regulations	1 st
Avoid unnecessary duplication of controls	2 nd
More efficient and effective use of public budget	3 rd
To establish consumer trust in the safety of food	3 rd
Limited government capacity/resources for oversight	4 th
Reduction in the regulatory burden for food industry	5 th

14. The areas where vTPA are most used are shown in Figure 4. Respondents to this survey who provided additional detail on particular value chains mentioned dairy, sesame, mango, cotton, shea butter and wheat.

⁶ Based on the information provided by 64 respondents.

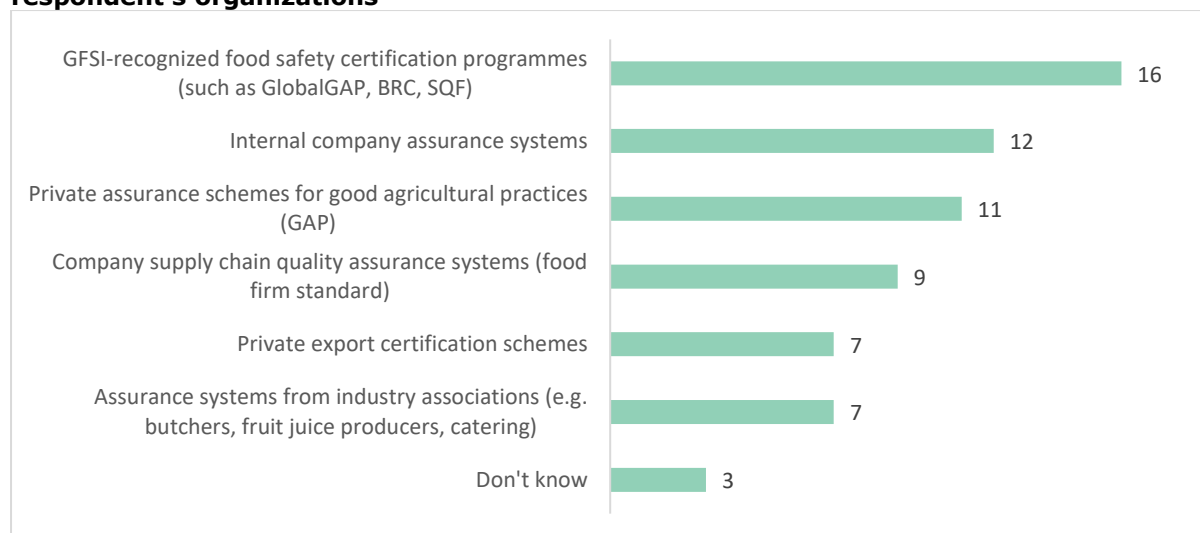
⁷ Based on the information provided by 25 respondents.

Figure 4: Areas of food and/or feed safety are covered by a vTPA programme⁸



15. As shown in Figure 5, the types of vTPA approaches used most frequently are GFSI-recognized programmes (including GlobalGAP, BRC, SQF, etc.), particularly among food manufacturers, followed by internal company assurance systems and assurance schemes for good agricultural practices (GAPs). Private export certification schemes and industry association developed assurance systems appear to be used less often. A few respondents pointed to other types of vTPA programmes recognized by their organizations, such as ISO 22000 standard, Halal and organic/fair trade certification. One respondent indicated that his/her authority authorizes certification bodies that meet specific criteria to carry out audits of food manufacturers.

Figure 5: Types of vTPA programmes recognized, taken into account and/or used by respondent's organizations⁹



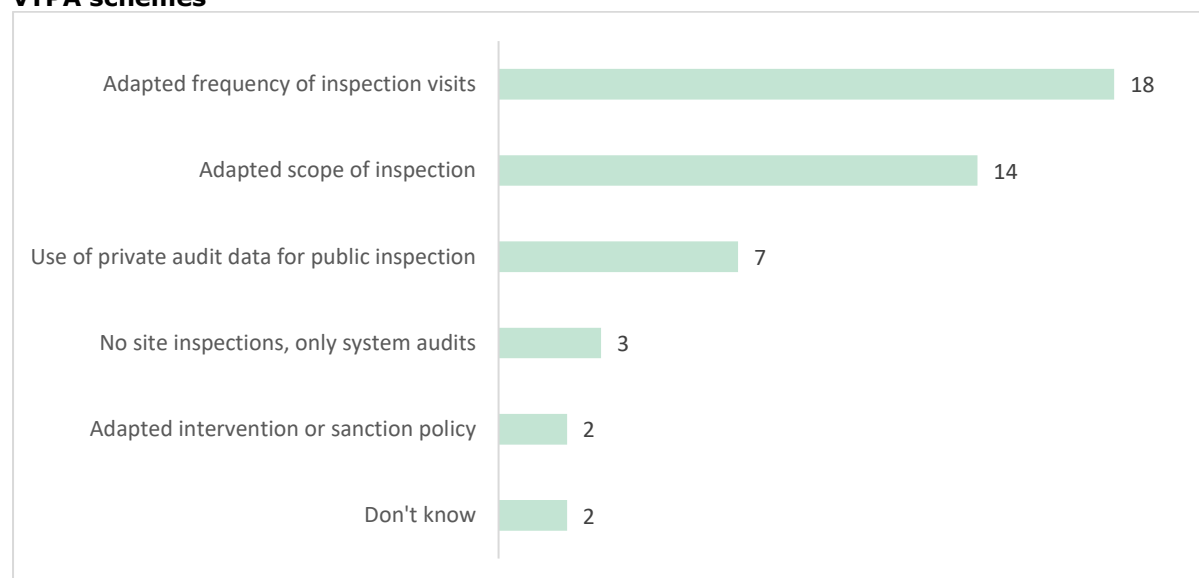
16. The survey responses show considerable diversity in the way in which food and feed safety authorities recognize and/or take into account participation in vTPA programmes (Figure 6). Adapted frequency and/or scope of official inspection are two of the main ways in which reliable data from vTPA programmes is used. Seven respondents indicated that private audit data is used to inform official inspections. Three respondents indicated that only systems audits (no onsite inspections) is carried out for FBOs using vTPA programmes, and two pointed to an adapted intervention or sanction policy. One respondent indicated that "subscription to vTPA scheme is accepted as adherence to food safety assurance programme, which is a regulatory requirement in domestic law". Although

⁸ Based on the information provided by 26 respondents.

⁹ Based on the information provided by 26 respondents.

he/she did not indicate in what specific ways his organization recognized participation in vTPA schemes.

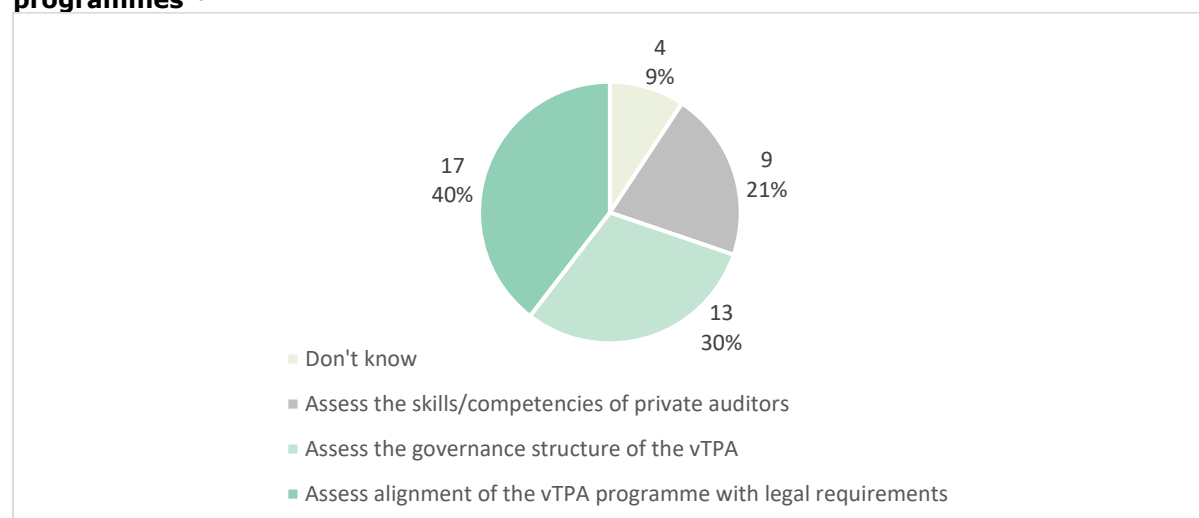
Figure 6: Ways in which organizations recognize and/or take into account participation in vTPA schemes



17. Depending on the local practices in conducting third-party audits, food and feed safety authorities consider different methods to evaluate the reliability of data generated through vTPA programmes. Figure 7 illustrates that 40% of 26 respondents indicated that they assess the alignment of the vTPA programme with legal requirements. In comparison, 30% consider the governance structure of the vTPA, 21% set the skills/competencies of private auditors, and 9% don't know.

18. A few respondents detailed their responses, adding that they: i) require the schemes to provide evidence on the assessment of auditor's skills; ii) assess reliability by following Codex draft guidance on vTPAs; and iii) monitor the certification bodies through audits and database of complaints, as well as the performance of vTPA providers through the routine work of government inspectors in establishments. One respondent indicated that while it does not currently conduct activities or systematically assess the reliability of vTPA schemes, it is currently developing an approach to engage with such activities in the future.

Figure 7: Assessment of information/data reliability generated through vTPA programmes¹⁰



¹⁰ Based on the information provided by 26 respondents.

19. Figure 8 illustrates the association between responses to four key questions in the survey. These questions are summarized in four blocks of rows (on the right side) and columns (on the bottom part). Each row (on the left side) and column (on the top part) of the matrix represents one response option linked to a question. Figure 8 is extracted from an online STDF/UNIDO data story. Readers are encouraged to consult the online data story to better understand and interact with the data presented below.¹¹

20. With the exception of cells appearing diagonally in the center of the chart, each cell in the matrix shows the number of responses accumulated to two different response options within the same question as well as across the four different questions. This value is mapped to the color depth of each cell and is also shown as a numeric label. For instance, from the 17 respondents that answered manufacturing as area covered by vTPA programmes, 14 pointed that GFSI recognized scheme serves as the primary data source for competent authorities, 14 (not necessarily the same 14 respondents to the previous item) indicated participation in vTPA programmes is recognized for adapted frequency of inspection, and also 14 considered that alignment of vTPA with legislation is a way to assess if data is reliable.

21. Based on Figure 8, it is possible to deduce that among the respondents who indicated that their organizations are using the vTPA approach for risk profiling, most data comes from GFSI recognized programmes. In particular, mainly for food manufacturing, 14 respondents noted that data comes from) GFSI recognized programmes. For primary production, 11 respondents noted that data came from GFSI recognized schemes and 10 from company quality assurance programmes. This data is mainly taken into account through the adapted frequency and/or scope of inspections.

22. According to the responses, adequate practices in voluntary audits and in turn the reliability of the data generated by the vTPA are mostly assessed to be ensured through legal requirements and revision of vTPA governance structure, and less so by the competency of auditors working for private certification bodies. Nevertheless, all these areas should be considered to ensure the trustworthiness of data generated by vTPA programmes. One authority has a more sophisticated regulatory framework where food categories are subjected to mandatory food safety auditing based on risk groups.

¹¹ An online [data story](#) contains an interactive version of this matrix, which facilitates its visualization.

Figure 8: Diversity of vTPA programmes and way they are taken into account

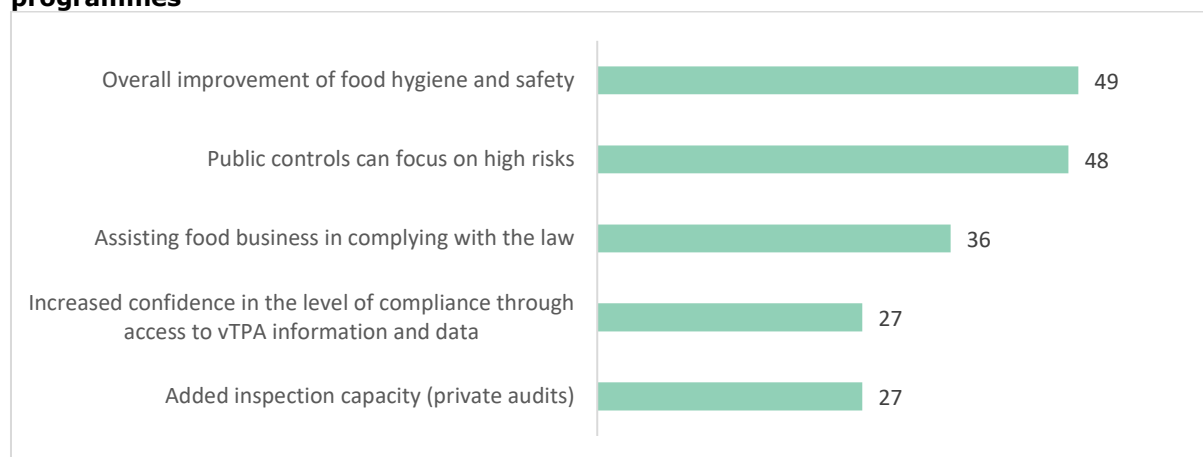
	Primary production	Manufacturing	Feed safety	Specific value chain	Company quality assurance (QA) system	Corporate supply chain QA system	GFSI recognized programme	Industry association QA system	Private export certification	GAP assurance schemes	Adapted frequency of inspections	Adapted scope of inspection	Use of private audit data for public inspection	Adapted intervention or sanction policy	No inspection, only system audit	vTPA governance structure assessed	Alignment of vTPA with legislation assessed	Competencies of private auditors assessed	
Primary production	15	11	8	5	10	7	11	7	3	9	12	9	5	1	2	10	12	6	Which areas are covered by vTPA programmes in your country?
Manufacturing		17	8	6	7	8	14	6	3	9	14	12	5	2	2	8	14	7	
Feed safety			9	3	5	4	8	4	1	5	9	5	2	1	1	5	8	4	
Specific value chain				9	3	3	6	4	3	4	6	5	2	1	2	4	7	5	
Company quality assurance (QA) system					12	6	8	4	5	6	9	8	4	1	2	8	8	4	Which types of vTPA programmes are recognized or used?
Corporate supply chain QA system						9	8	5	3	6	6	6	2	1	2	5	9	3	
GFSI recognized programme							16	5	3	9	11	10	4	1	1	7	13	5	
Industry association QA system								7	2	5	6	4	1	1	2	4	6	5	
Private export certification									7	4	4	5	2	2	3	5	4	3	
GAP assurance schemes										11	9	8	4	1	2	7	9	5	
Adapted frequency of inspections											18	11	5	2	2	10	12	9	How is the vTPA programme recognized and/ or taken into account?
Adapted scope of inspection												14	6	2	2	10	12	6	
Use of private audit data for public inspection													7	1	0	5	5	1	
Adapted intervention or sanction policy														2	1	2	1	1	
No inspection, only system audit															3	2	3	2	
vTPA governance structure assessed																13	9	6	How is the reliability of data from vTPA programs assessed?
Alignment of vTPA with legislation assessed																	17	6	
Competencies of private auditors assessed																		9	
Which areas are covered by vTPA programmes in your country?					Which types of vTPA programmes are recognized or used?						How is the vTPA programme recognized and/ or taken into account?					How is the reliability of data from vTPA programs assessed?			

Making use of vTPA programmes: benefits and concerns

23. Figure 9 demonstrates that the majority of respondents (75%+) see advantages of governmental cooperation with private assurance systems. Survey respondents cited two main benefits of this cooperation: i) an overall improvement in food hygiene and safety (49); and ii) the opportunity to target public controls to higher risk products (48). Over half of respondents pointed to the opportunity for vTPA programmes to support food businesses to comply with legal requirements. These findings reflect the views expressed in the survey by T. Havinga that use of vTPA programmes is likely to improve overall food hygiene and safety and promote compliance with regulations.

24. In general, all respondents whose organizations use, or plan to use the vTPA approach expect this to support food safety inspection by allowing decision-makers to redirect attention towards less compliant FBOs and higher risks. This is perceived to strengthen inspection capacity by expanding coverage to more sites, particularly when resources are limited. It is also seen as a way to raise awareness of the importance of food safety in FBOs and municipal governments. For instance, one respondent highlighted that "earned recognition"¹² had reduced the annual number of dairy inspections carried out by the central authority by 80% from around 3,800 to 760.

Figure 9: Main benefits of cooperation between the public sector and vTPA programmes¹³



Box 1: Voices from respondents on how vTPA programmes complement and support national food control systems¹⁴

"Although they do not replace regulatory oversight, vTPAs complement the regulatory oversight and enable the competent authority to efficiently use limited resources in high risk areas."

"Due to regulators' limited resources, vTPA programmes enable bigger capacity in increasing the implementation of food safety assurance program."

"The idea is to achieve two goals: a more efficient use of public resources and a better targeting of official controls. To achieve this, a procedure for validating the private standard (vTPA programmes) must first be established and the data protection or confidentiality aspect must be regulated. This also requires the agreement of the operator. The operator must be free to choose whether or not to participate."

25. Despite the widely perceived benefits, survey respondents also identified some concerns and risks related to the use of vTPA programmes. Over half are concerned that this type of cooperation may generate additional financial costs for FBOs. 42% pointed to issues or risks related to the

¹² Reduced inspection frequency introduced for compliant members of approved assurance schemes in three areas: primary production; dairy hygiene and animal feed.

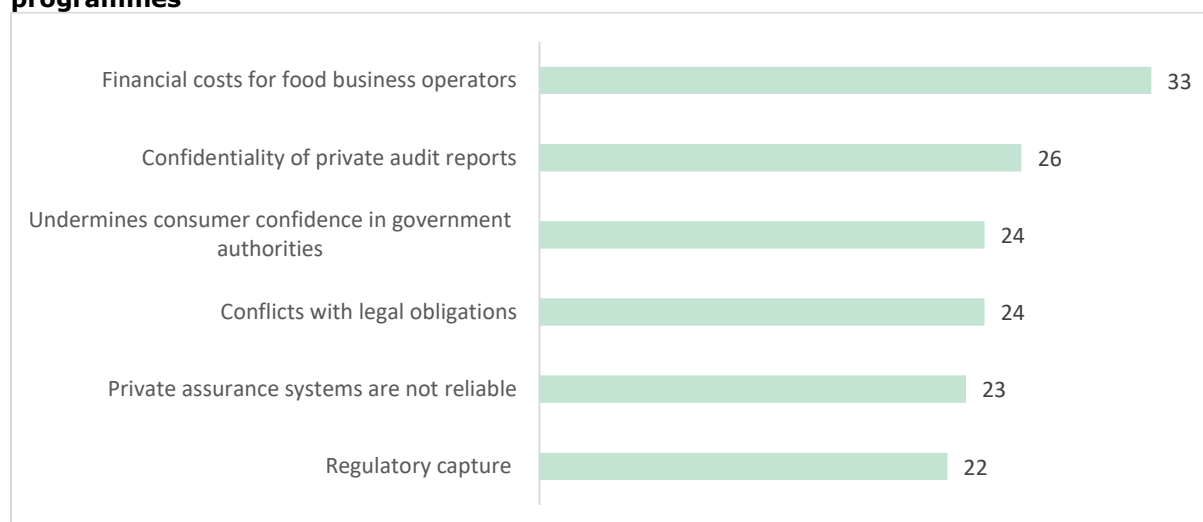
¹³ Based on the information provided by 62 respondents.

¹⁴ Based on the information provided by 27 respondents.

confidentiality of private audit reports as a risk for data-sharing. One important concern related to the risk that cooperation on vTPA programmes may compromise or threaten the responsibility and accountability of the public sector for food/feed safety control. Some respondents raised concerns about the potential confidentiality and reliability of audit reports given the limited independence and financial bottom-line driving private auditors. 35% pointed to concerns about regulatory capture, which related to public food authorities becoming dominated by the interests of the food industry. Other concerns raised related to: risks of private assurance systems not being reliable; potential conflict with existing laws and regulations; lack of alignment of private standards with public control measures; additional requirements that go beyond official food/feed safety standards. Some of these concerns reflect issues previously highlighted by respondents to the survey by T. Havinga. Though, the Havinga survey reported loss of consumer confidence in government authorities and regulatory capture as the highest risks of cooperation with private assurance systems.

26. One respondent pointed to considerable resource implications of working with vTPA programmes reflecting the need for to monitor these schemes and implement governance procedures. In this case, it was stated that such cooperation is more resource-effective when there is a certification body that covers a significant number of establishments or share of a food/feed sector. Another respondent noted that the risks are manageable, provided that the government is able to satisfactorily set-up and manage the use of vTPA programmes.

Figure 10: Main concerns or risks of cooperation between the public sector and vTPA programmes¹⁵



27. One respondent shared his/her concern about the competency of auditors to complete audit reports on the food safety performance of businesses.

Box 2: Voices from respondents on challenges facing cooperation between regulatory authorities and vTPA programmes

"The resource required to monitor the schemes and implement governance procedures can be onerous for the central competent authority, and so it is more resource effective to have a vTPA arrangement with a body that will cover a significant number of establishments or a large proportion of a particular feed/food sector."

"With regards to our answer of 'private assurance systems are not reliable', reliability of auditors is unknown. With regards to our answer of 'conflicts with legal obligations', private standards may not be aligned with public requirements"

"Accreditation and certification systems for GAPs are not reliable in my country and cannot control the safety of food from farm to table."

¹⁵ Based on the information provided by 62 respondents.

2. OPERATIONAL ASPECTS

28. Respondents identified three main prerequisites for their current or potential use of the vTPA approach:

- i. FBOs use vTPA programmes (which may comprise GFSI-recognized schemes, corporate internal food safety programmes, private schemes, company supply chain systems, private export certification, schemes owned by industry associations, etc.) based on their needs.
- ii. Existence of internationally recognized quality infrastructure system. The trustworthiness of audit outcomes depends on the development level national quality infrastructure system, and notably, the competence of auditors to generate trusted data.
- iii. Legal foundation and operational capability of regulators to obtain, assess, analyze and use reliable data from vTPA programmes. Specific modules of a performance monitoring framework of a national food control system should be in place, including the ability of regulators to gain, analyze and interpret data received from parties, which need to or are willing to share data / information. This also entails a more advanced information technology infrastructure and human resource for data application clearly guided by policies, strategies and laws concerning data privacy and ownership.

29. Table 2 reports on the survey's findings related to national requirements for FBOs. Over 93% of 61 respondents reported that FBOs are required to register and/or be licensed by a national government authority before starting operations. Registration may require provision of: i) general information on the company's name, address, company number, contact, start date, location, number of employees, commodity/products handled, etc.; ii) technical information on the type of industry / business (manufacture, processing, retail/catering), licenses, activities, processes, etc.); and/or iii) details on the food safety management system used including SOPs, GMPs, HACCP plans, etc. Registration by the competent authority depends on the type of product, risk and certification procedure.

30. Table 2 shows that a significant share (72% of 61 observations) of competent authorities conduct an initial inspection before approving FBOs. One respondent noted that a partial on-site inspection may also be required on the license holder's control programme and preventive plan, depending on the risks posed by the food commodity produced.

31. Survey responses show that fewer than half of regulatory authorities ask for and receive information about FBOs from certification bodies. One respondent indicated that information is not received directly from certification bodies, but audit reports are considered as part of the inspection. By comparison, the findings of the Havinga survey show a lower level of positive responses to a similar question. Her survey reported that in 2018, 33% of (40) respondents indicated that their country takes private assurance schemes into account in their inspection policy.

Table 2: Registration/licensing, inspection and use of information of FBOs

Answer	Registration/licensing of FBOs with a national government authority before starting operations	Competent authority conducts initial inspection before approving an FBO	Competent authority considers information about FBOs received from certification bodies in their inspection policy
Yes	57 (93%)	44 (72%)	27 (44%)
No	4	13	27
Don't know	n/a	4	7
Total	61	61	61

32. Figure 11 shows the association between responses provided to three questions related to registration/licensing and inspection of FBOs, as well as use of information received on FBOs from certification bodies. It illustrates that from 57 authorities that collect information from FBOs for registration purposes (sometimes complemented by on-side visits), a smaller number (42) cited they also require inspections before approving an FBO. From authorities that do both, registration and inspections of FBOs, before starting operations, only 20 indicated they consider information about FBOs received from certification bodies.

Figure 11: Association between questions on the registration, inspection and/or use of information provided by FBOs

Q12. Do food businesses have to register, or be licensed to commencing operation?	Q13. Does your organization conduct any initial inspection before approving a food business?	Q14. Does your organization consider information received on food business operators from certification bodies?
No 4	No 2	No 2
	Yes 2	
Yes 57	Don't Know 4	Don't Know 2
	No 11	No 6
		Yes 5
	Yes 42	Don't Know 5
		No 17
		Yes 20

Box 3: Voices from respondents on how information received from certification bodies is considered and the contribution it brings

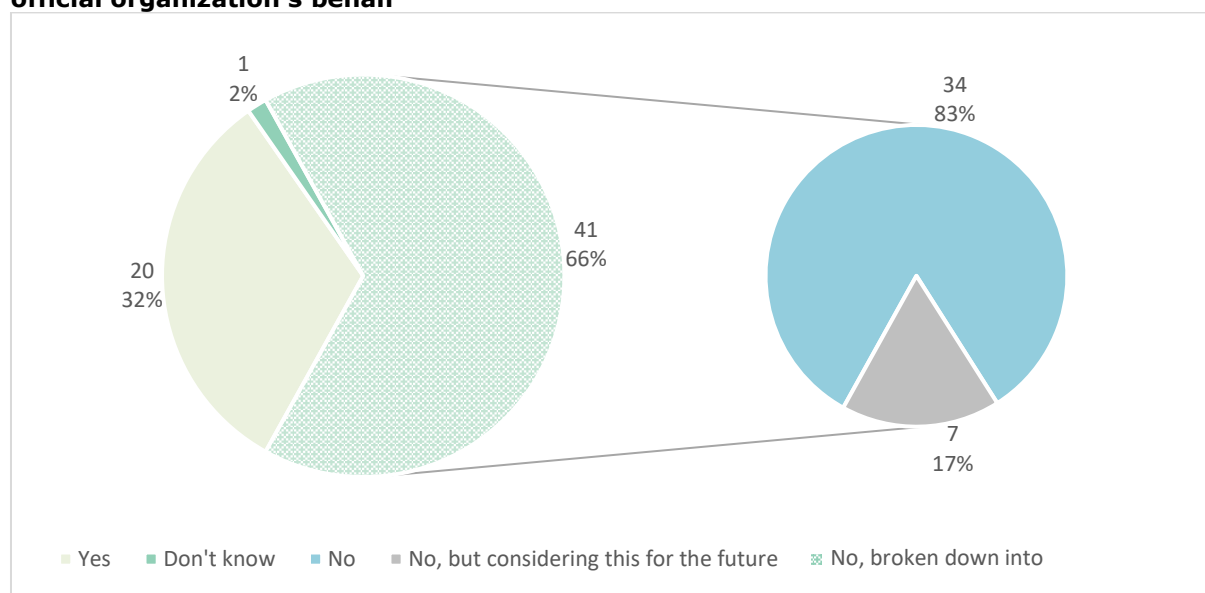
"Third party information is primarily used for inspection prioritization and to support participation in a voluntary imports program."

" All certifications received from private certification bodies is taken into consideration during the inspection as well as the documentation showing that the food business is compliant with the local standard or regulation (this includes ISO certification)."

"In my country, the food safety authority implements a risk-based control system of establishments which is based on routine inspections and voluntary validation/certification of Self-Checking Systems (SCS) through audits based on approved sector guides (GHP and HACCP). These audits can be performed by Competent Authority (CA) officials or delegated to Certification Bodies (CBs)."

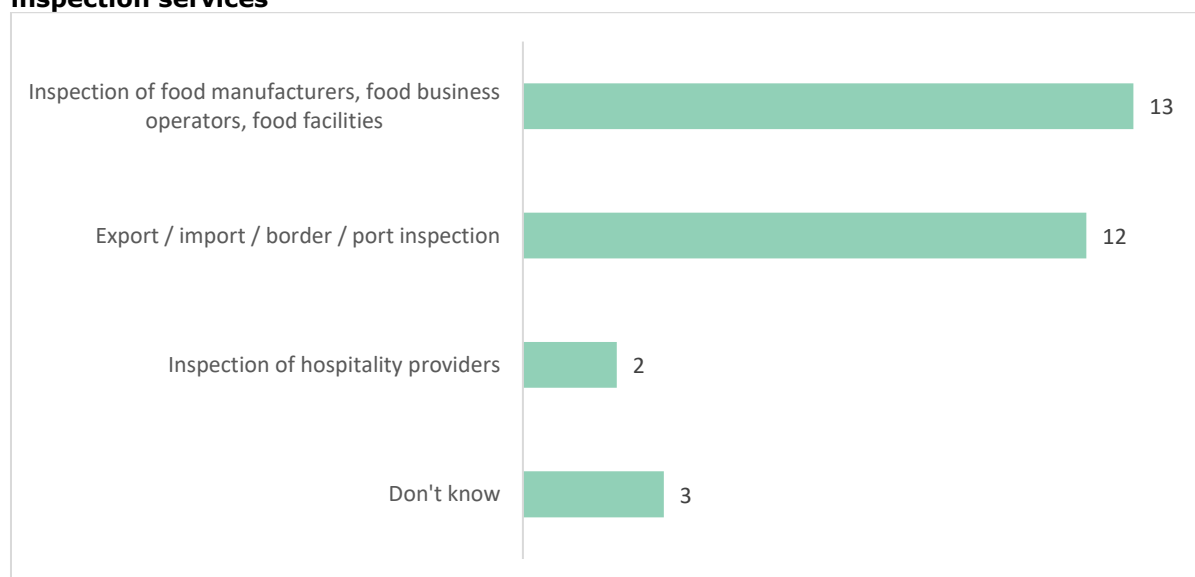
33. Figure 12 shows that about a third of the regulatory authorities responding to the survey subcontract third parties to carry out food safety inspections on their behalf, with others (17%) considering this option for the future.

Figure 12: Subcontracting external/third parties to conduct inspection services on the official organization's behalf¹⁶



34. Competent authorities subcontract the delivery of inspections to third party service providers in different areas, as shown in Figure 14. Considering the 20 abovementioned observations, more than half of the respondents (13) cited the first area as the scope in which their organizations subcontract external parties and 12 selected the second option, with four overlapping answers. Only two respondents indicated that their organizations subcontract external parties for inspection of hospitality providers. Respondents included other areas such as subcontract third parties to inspect primary production of food.

Figure 13: Areas where organizations subcontract external/third parties to conduct inspection services¹⁷

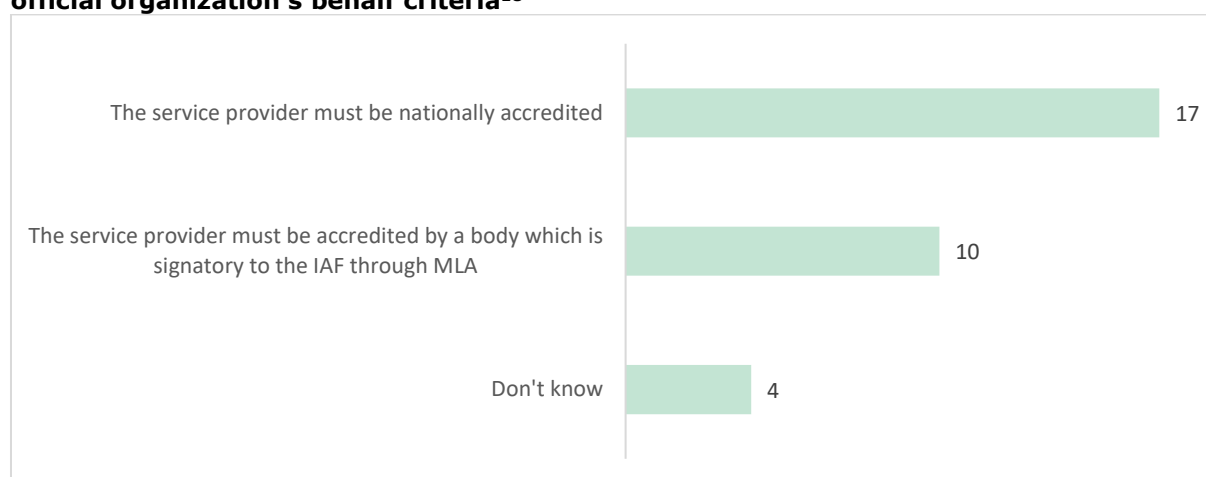


35. Out of the 20 national authorities that subcontract external parties, 17 indicated that their service provider must be accredited nationally (Figure 14). Ten respondents indicated that the service provider must be accredited by a body which is signatory to the International Accreditation Forum (IAF) via a Multilateral Recognition Arrangement (MLA). Seven respondents considered it is necessary to have both national and IAF accreditation.

¹⁶ Based on the information provided by 61 respondents.

¹⁷ Based on the information provided by 23 respondents.

Figure 14: Subcontracting external/third parties to conduct inspection services on the official organization's behalf criteria¹⁸



Box 4: Views from respondents related to vTPA programmes and food inspection

"Responsibility for food inspection is shared between Local Authorities (LAs) and the competent authorities (CAs). LAs carry out official controls on behalf of the CAs in the majority of food and feed establishments, and operate with a Framework Agreement with the concerned authority."

"Inspection is done with a risk approach. It takes into account the results of previous inspections, epidemiological research and consumer's complaints."

"Inspections are carried out on a risk-based approach, in order to focus efforts and optimize resources."

"vTPA concerns audits rather than inspections. Audits are based on the food safety authority approved sector guides in order to validate the self-checking system."

"Inspection for audit purposes for certification (e.g. HACCP) should be differentiated from inspection in the framework of official monitoring and control. The first one could be outsourced to a private service under a good system of official audit or verification towards the third one, but the second one is an inherent activity of the health authority. I would say non-delegable."

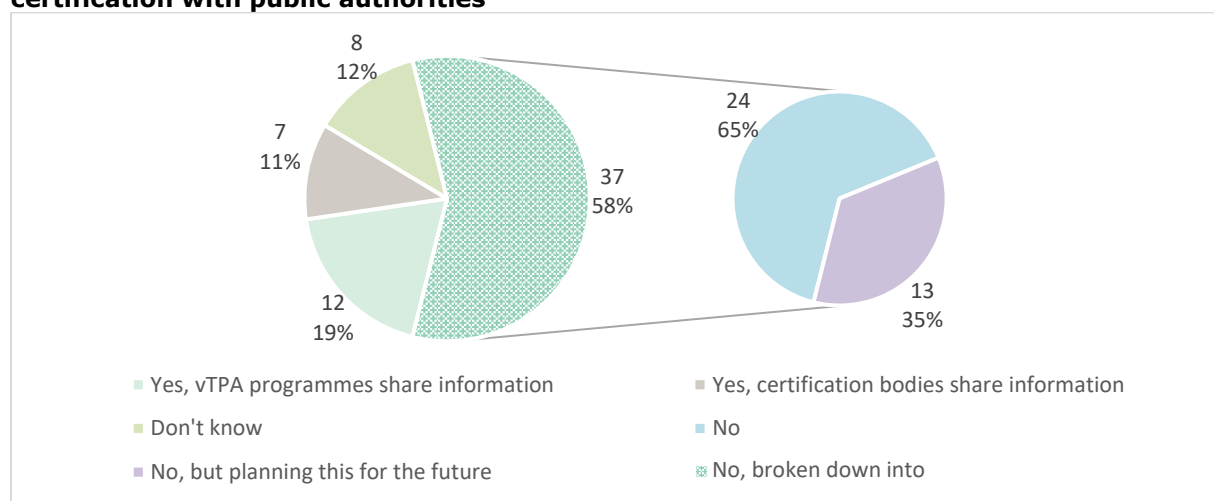
3. DATA SHARING, ASSESSMENT AND RECOGNITION OF vTPA

36. The survey investigated if and how regulatory authorities, vTPA programme owners and/or certification bodies share information with each other. Among the 24 government respondents who said that information from vTPA programmes is considered, recognized and/or used (Figure 3), 19 indicated they receive information from both vTPA programme owners and certification bodies. Twelve said they receive information only from vTPA programme owners, and seven only from certification bodies (Figure 15). Respondents from 13 authorities said they are planning to develop such information exchange.

37. Respondents who answered no to the question on information exchange noted that their country does not have a vTPA policy and pointed to weak or non-existence coordination between the regulatory authority and vTPA programme owners or certification bodies.

¹⁸ Based on the information provided by 24 respondents.

Figure 15: Share of information/data from third-party assurance programmes and/or certification with public authorities¹⁹



38. Further investigating, 16 authorities explained the kind of information they receive from certification bodies or vTPA programmes. As illustrated in Figure 16, this mainly includes information on: food businesses participating in vTPA programmes; serious food safety risks; major non-conformities and/or remedial actions. Respondents from four countries indicated that vTPA programme owners and certification bodies share all audit reports with their organization. Less systematic sharing takes place elsewhere. For instance, specific audit reports are shared on the request of five regulatory authorities, audit results are shared at an aggregate level with five respondents, information on all non-conformities is shared with five authorities.

39. Some respondents added that information shared by certification bodies may include audit results, serious notifications of non-conformities, audit planning, reports and any other relevant information requested by the competent authority. One respondent remarked that vTPA programmes operating under their third-party certification programme have an obligation to share serious findings with the competent authority. Finally, information shared by vTPA programme owners may also include results of sampling programmes.

Figure 16: Kind of information shared by voluntary third-party assurance programmes and/or certification bodies²⁰

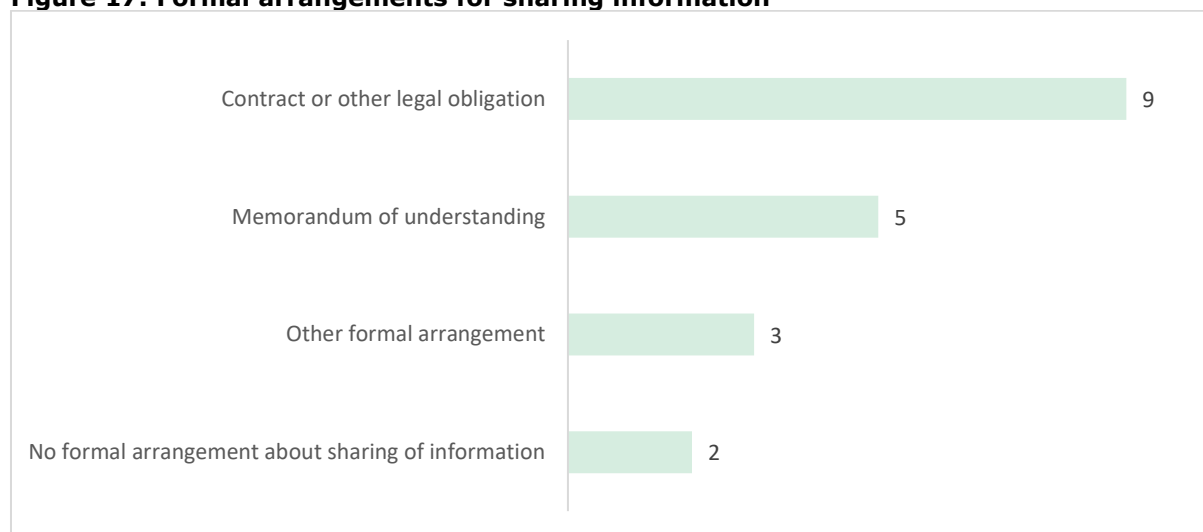


¹⁹ Based on the information provided by 58 respondents.

²⁰ Based on the information provided by 16 respondents.

40. The survey findings reveal that information sharing almost always occurs based on a formal arrangement, such as a contract, memorandum of understanding or other formal arrangement (Figure 17). Only two respondents pointed to information exchange in the absence of a legal understanding.

Figure 17: Formal arrangements for sharing information²¹



Box 5: Factors that limit information exchange between vTPA programme owners, certification bodies and competent authorities

"Concerns regarding legal requirements/restraints on sharing information on individuals, including general data protection regulations)."

"The internal safety control systems, defined and managed by the CA and eventually certified by non-official third parties, should generate information to facilitate the official control. Reliability of the information is the central issue for its use. This issue depends on the independence of the auditor, quality of the control instances including the analysis laboratories and timely availability of the results."

"Communication mechanisms have not been established. There is no specific department within the regulatory authority charged with managing communication and relations with these types of bodies."

"No national policy or legislation with enabling provisions in place. The current draft food safety policy only recognizes the role of vTPA programmes but does not elaborate further."

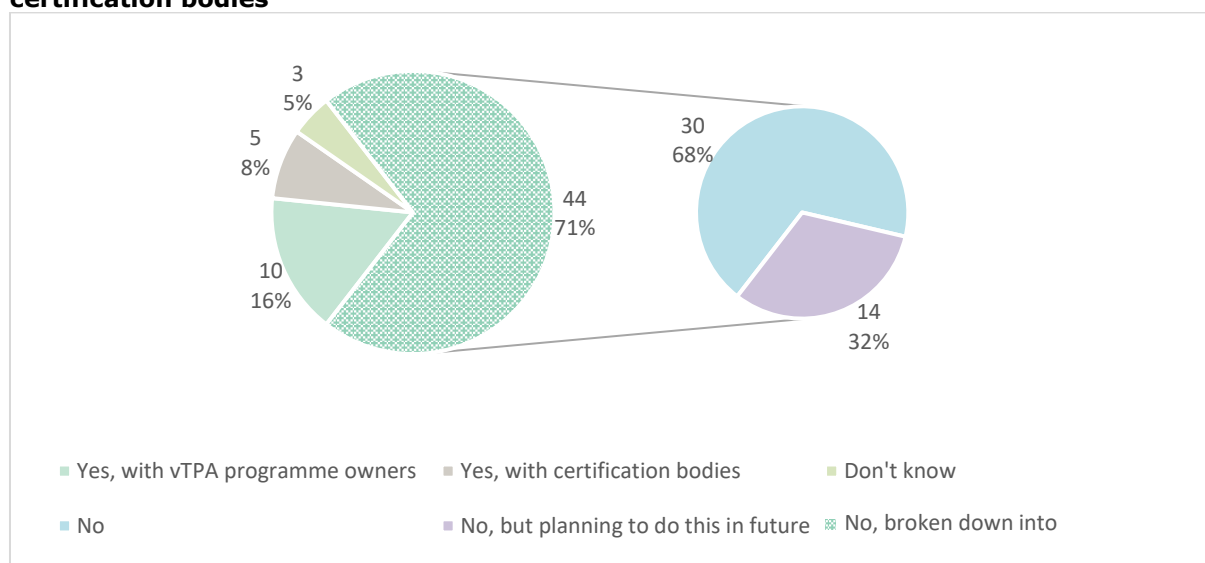
"Not required by law, but data may be requested for a risk assessment process or for scientific research."

"There is no recognition by the authority of the certification provided by third parties and therefore the authority does not use information on these certifications."

41. While some information flows from vTPA programmes and certification bodies to regulatory authorities, less information exchange occurs in the other direction. As shown in Figure 18, only 15 food and/or feed safety authorities (out of 60) share information with vTPA programmes owners and certification bodies. Ten authorities share data with vTPA programme owners and 5 with certification bodies. Among the regulatory organizations (44) that do not currently share information with the private sector, 14 (32%) plan to do so in the future.

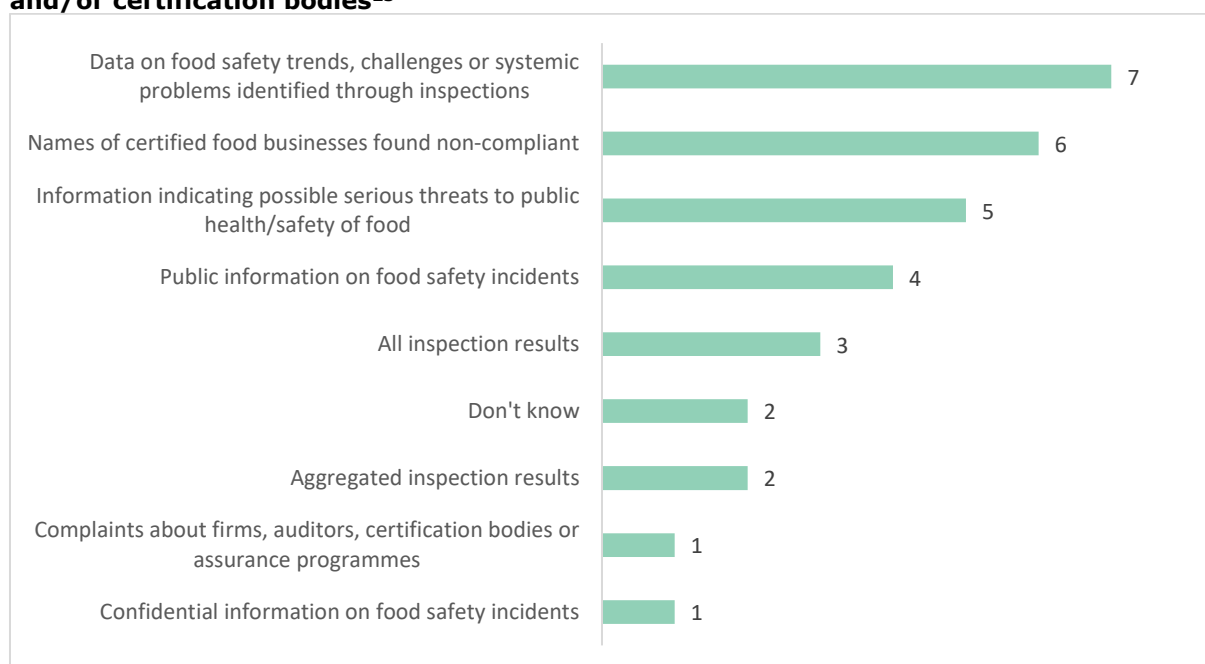
²¹ Based on the information provided by 17 respondents.

Figure 18: Information shared by competent authorities with vTPA programmes and/or certification bodies²²



42. Information shared by government authorities covers food safety trends, challenges or systemic problems identified through inspections, names of certified food businesses found to be non-compliant, possible serious threats and/or food safety incidents, etc. (Figure 19). Few government authorities share information on inspection results.

Figure 19: Type of information shared by competent authorities with vTPA programmes and/or certification bodies²³



²² Based on the information provided by 60 respondents.

²³ Based on the information provided by 14 respondents.

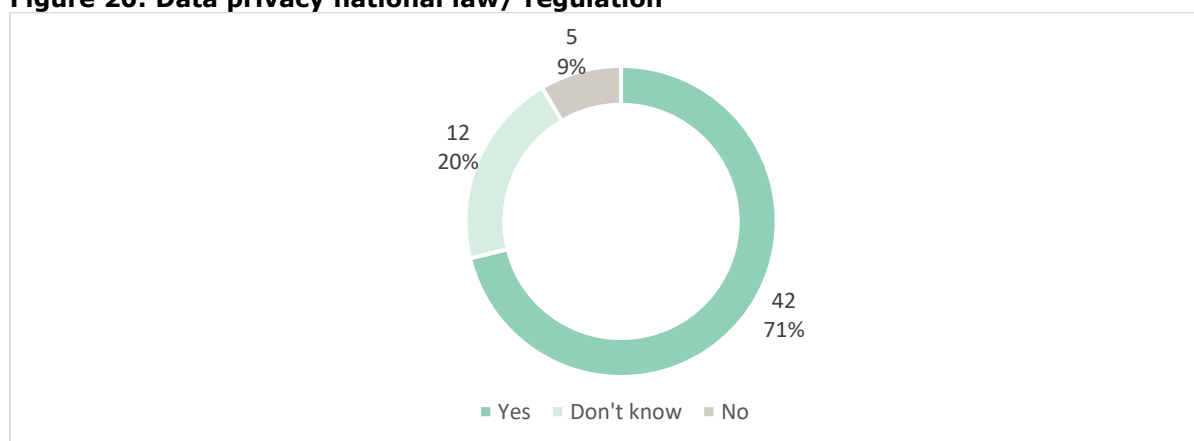
Box 6: Insights on how some authorities share information with vTPA programmes and/or certification bodies

"We rely on local authorities who are carrying out inspections to notify us if an establishment which falls under a relevant scheme has non conformances which require some action by the third-party assurance scheme. We then notify the scheme of the issues and request feedback on action taken by them to remedy the problem. We then update the local authorities. This ensures there is a complete information sharing loop."

"The communication of information from the Competent Authority (CA) to Certificate Programme Owners (CPOs)²⁴ exchange of data currently already exists in the feed sector; this concern results of CA and feed sector sampling plans. In addition, in the frame of the validation audits, the Certification Bodies also have the possibility to request the official inspection reports to the audited companies"

43. The majority of survey respondents indicated that they have data privacy law or similar regulations which ensure confidentiality (Figure 20). Respondents also remarked that data sharing may be part of a memorandum of understanding signed with relevant vTPA programme owners, and that regulations should govern information exchange between public and private stakeholders.

Figure 20: Data privacy national law/ regulation²⁵



Box 7: Insights from respondents on data sharing

"In my country, data sharing should consider: i) confidentiality and the nature of the information; ii) liabilities; iii) categorization/classification of information (what should be shared); iv) how should the information be shared (electronic only and/or paper); and v) channel of communication."

"There is minimal sharing from the national Food Safety Authority (FSA) to vTPA programme owners. vTPA programmes operating under our third-party certification programme have an obligation to share serious findings with the FSA."

"Regulations on data sharing include guidelines on managing, connecting and sharing digital data of state agencies, as well as standards to input data and for the preservation of electronic archives."

44. Data and/or information sharing is crucial for the successful use of vTPA programmes to better target official controls through improved risk-based inspection and enhanced risk profiling of food businesses. Some respondents pointed to the confidentiality of relationships between private certification bodies and their clients (e.g. information in private audit reports) as well as possible conflicts of interest (based on payments) as a risk for cooperation between regulatory authorities and vTPA programme owners. In that sense, one respondent added: "Private controls are paid for by companies which makes it difficult to be legally recognized as 'judge and party' of the control".

²⁴ Definition: "Auditors are employed by certification bodies (CBs), contracted by certification program owners (CPOs) to carry out audits according to the CPOs' scopes and standards". Retrieved from: <https://www.foodprocessing.com/articles/2020/four-gfsi-myths-busted/>

²⁵ Based on the information provided by 59 respondents.

No information was provided on formal agreement with food business to agree on sharing such information with competent authorities.

45. In order to consider the shared data as trustworthy, the survey explored practices and experiences related to the assessment and/or recognition of vTPA programmes by food safety regulatory authorities. The findings of these questions are aggregated in Figure 21, which also shows the associations between the responses.

46. While most respondents indicate the existence of a national accreditation body, around roughly half of respondents say their bodies are affiliated to IAF or related regional groupings. Around half of respondents indicated that they are aware of the work carried out by certification bodies. Approximately half also said they interact with certification bodies.

47. Some respondents explained how they stay informed about the work of certification bodies in their country, including through regular meetings, exchange via email, formal letters or other means, review of information available on the Internet and in other documents (e.g. newsletters, publications, etc.). Several respondents noted that officials from their authority interact with staff of certification bodies in other ways including participation in joint trainings, assessments for accreditation approval, and observation of audits.

48. Fewer than half of respondents were able to respond to questions related to how vTPA programmes are recognized in their country. This included questions on the availability of national conformity assessment services, which are essential to ensure the reliability of data generated by vTPA programmes as well as audits carried out by certification bodies (questions 32, 34 and 35).

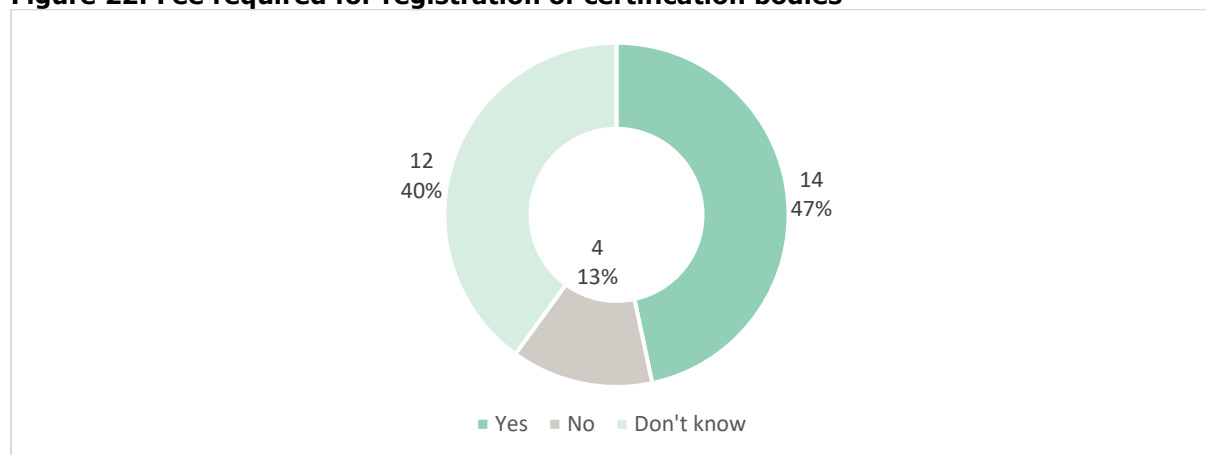
49. Figure 21 provides an overview of responses on questions related to the existence and standing (international/regional affiliation) of national accreditation bodies, regulatory authorities' awareness about national accreditation bodies, communication and interaction, information exchange and the need for registration of national accreditation bodies, etc. In general, the responses point to a less than ideal set-up or practice within countries for ensuring the integrity and trustworthiness of data generated by vTPA programmes, as shown below. This is because, in most cases, some elements of what would generally be desired in terms of accreditation and the relationship with regulatory authorities is missing. For instance, the areas shaded in blue illustrate two directions (to the right side) of responses that indicate this ideal set-up. Only seven respondents (out of 58) responded positively to all the aforementioned questions, which points to a weak relationship between competent authorities and certification bodies in the majority of cases.

Figure 21: Correlation of questions 27 to 35 on the assessment and recognition of vTPA programmes

Q27. Does your country have a National Accreditation Body?	Q29. Is the National Accreditation Body affiliated?	Q30. Does your organization know about the activities undertaken by certification bodies?	Q31. Does your organization have interactions with certification bodies?	Q32. Is it compulsory for certification bodies to register with competent authority?	Q34. Do certification bodies provide any information to your organization?	Q35. Do certification bodies provide any information to follow up on non conformities?
Yes 43	Yes, to IAF 21	Yes 14	Yes 12	Yes 8	Yes 6	Yes 4
						No 2
		No 7	No 5	No 5	No 4	
	Yes, to a regional body 13	Yes 8	Yes 7	Yes 6	Yes 3	Yes 3
	No 9	Yes 4	No 3	No 2	No 2	
No 15	No 15	No 7	No 6	Yes 3	No 2	
		Yes 8	Yes 5	Yes 2	No 2	
		No 3	No 3	Yes 2	No 2	

50. The survey findings indicate that certification bodies often must pay a fee to register with competent authorities (12 out of 30 respondents).

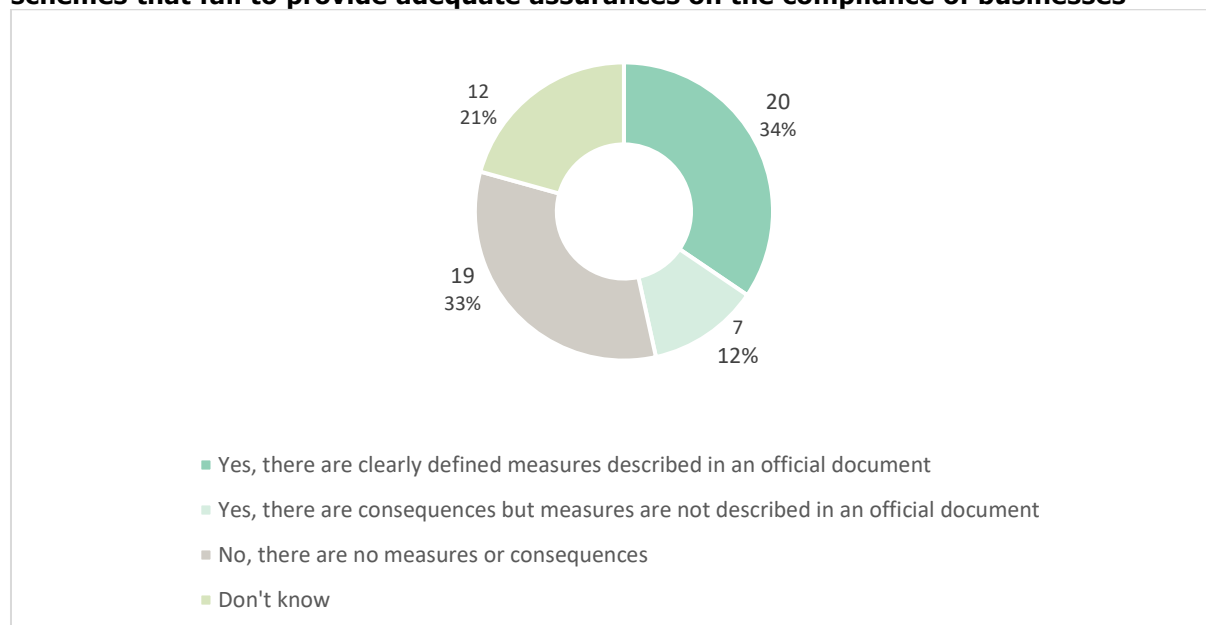
Figure 22: Fee required for registration of certification bodies²⁶



51. The survey also explored practices related to measures or consequences for certification bodies or vTPA programme owners that fail to provide adequate assurances on the compliance of FBOs (Figure 23). Close to half of respondents (46%) indicated that there are consequences (including defined measures described in an official document). Just under a third of respondents replied that there are no such measures or consequences, and 21% did not know.

52. Some respondents provided details on the types of measures applied to vTPA programme owners when the assurance provided on compliance is inadequate. These include withdrawal of the vTPA programmes approval for earned recognition, suspension of approval or restrictions, increased frequency of audits of non-conforming FBOs, increased inspections, etc.

Figure 23: Existence of defined measures or consequences for private assurance schemes that fail to provide adequate assurances on the compliance of businesses²⁷



²⁶ Based on the information provided by 30 respondents.

²⁷ Based on the information provided by 58 respondents.

Box 8: Additional insights on vTPA programmes shared by survey respondents

"In my country, the competent authority has a long established vTPA programme and introduced a reduced inspection frequency through earned recognition for compliant members of approved assurance schemes in three areas: primary production (2006); dairy hygiene (2011) and animal feed (2014). This earned recognition enables local authorities and the national authority to focus their resources on businesses that are less compliant and higher risk. For example, earned recognition has reduced the number of dairy inspections carried out by the competent authority from around 3,800 to 760 per year. For an assurance scheme to be approved by the competent authority, it must meet a number of recognition criteria and we keep the approved schemes under review to ensure fitness for purpose."

"It would be very useful for governments if vTPA programmes were developed according to the sphere of production being handled, e.g. primary production (unprocessed food) and processed food."

"The internal safety control systems defined and managed by the interested party, and eventually certified by non-official third parties, should generate information to facilitate official control, with the reliability of the information being central to its use: independence of the auditor, quality of the control bodies including the analysis laboratories, and timely availability of the results."

Key conclusions

53. There appears to be growing recognition of the benefits of cooperation between regulatory authorities and the private sector to multiply the results achieved by food control systems including to improve food hygiene and safety, support a more efficient allocation of resources (time) during inspections, and to allow official controls to focus on higher risks. This includes an exchange of information between regulatory authorities and the third-party service entities (vTPA programme owners and certification bodies) with the consent of food businesses. Existing concerns related to cooperation with the private sector on the use of vTPA programmes include possible additional financial costs for FBOs, confidentiality and reliability of private assurance systems, regulatory capture and duplication of existing laws and regulations. Factors that facilitate and/or encourage the use of the vTPA approach by governments include regulatory and buyer requirements, internationally-recognized quality infrastructure, and legal and operational capability (including policies, strategies, legislation, IT systems) to ensure data privacy and management.

54. The survey findings point to differences in the ways in which food safety regulatory authorities assess and/or recognize vTPA programmes. While some respondents pointed to limited capacity in this area, others indicated the existence of the necessary enablers / requirements to ensure the trustworthiness of the audit outcomes based on vTPA programmes, including: existing policy framework for proper deployment of the vTPA approach, a national quality infrastructure system with an existing national accreditation body affiliated to the IAF and/or an regional body, understanding of regulators about the competences of and activities undertaken by certification bodies; registration of certification bodies with competent authorities; and information sharing of audited food business operators based on a formal agreement.

55. The responses generally point to significant interest in the potential of the vTPA approach to strengthen national food control systems. However, the number of incomplete responses points to ongoing knowledge gaps about what this approach means in practice and how it can be used or actually built. In this context, the forthcoming Codex Guidelines on the use of third-party assurance programmes (expected to go to Codex for adoption in 2021) will be crucial to raise knowledge on this topic, and promote a more harmonized and robust approach to the use of vTPA programmes in practice. The Codex Guidelines will also help to ensure clarity on what the vTPA approach does not seek to do (i.e. they will not mandate the use of vTPA programmes, officially recognize inspection or certification bodies or apply private standards).

56. The survey findings underline the rich experiences and learnings related to the use of vTPA programmes, especially in the manufacturing and primary production among several developed countries. Despite the differences across developing and developed countries, these experiences can be valuable to anyone interested to learn more about different approaches used, as well as the challenges faced, and outcomes obtained. They also point to the need for further reflection and attention at the country level to:

- the particular context of the national food control system (including the legal framework, institutional roles and responsibilities in the regulatory authorities, the operation and delivery of food inspection, resources, etc.);
- the structure and capacity of FBOs (including level of organization, knowledge and skills, food safety infrastructure, etc.) as well as the service providers and conformity assessment infrastructure etc.
- the requirements (e.g. available human resources, knowledge and skills, the legal framework, inspection operating procedures, etc.) to make use of the vTPA approach.

57. The STDF regional pilot projects will provide a means to advance knowledge and learning on the above-mentioned issues in a developing country context, and to understand how the Codex Guidelines can be applied in practice. For instance, this may include attention to the development and use of guidelines that help regulators to make use of vTPA programmes in a way that supports the overall objectives of their national food control system. It may also encompass development of guidance and training on data sharing, supervision mechanisms, etc.

ANNEX 1. STDF/UNIDO/IICA SURVEY ON vTPA FOR FOOD SAFETY REGULATORS

STDF/IICA/UNIDO Survey to competent authorities on voluntary third-party assurance programmes

1. INTRODUCTION

Aim: this survey aims to increase understanding of existing and/or planned regulatory frameworks and practices related to voluntary third-party assurance (vTPA) programmes (including quality management systems, assurance schemes or certification programmes) in food and feed safety. It is linked to work by the Standards and Trade Development Facility (STDF) to pilot the use of vTPA programmes in [Africa](#) and [Central America](#), and complementary work by the United Nations Industrial Development Organization (UNIDO) in the Arab and COMESA regions. It incorporates some questions from a previous survey on [food safety governance by Dr Tetty Havinga](#) (Radboud University).

Who should complete this survey?

Representatives from government authorities with a role in food safety are kindly requested to complete this survey. We would like to learn from your knowledge and experiences. We will report on the collective responses received. Individual responses will be treated anonymously.

vTPA programmes: The Codex Committee on Food Import and Export Inspection and Certification Systems (CCIFCS) defines vTPA programmes as: "a non-governmental or autonomous scheme compromising of the ownership of a standard that utilizes national/international requirements; a governance structure for certification and enforcement, and in which food-business operator (FBO) participation is voluntary" (CX/FICS 18/24/6).

The vTPA approach is enabled through the Codex Principles and Guidelines for National Food Control Systems (CAC GL 82-2013) which states that "where quality assurance systems are used by food business operators, the national food control system should take them into account where such systems relate to protecting consumer health and ensuring fair practices in the food trade" (para 54).

Getting started: Please respond to the questions below based on your best knowledge. If you have any reservations with any questions or additional information which you might want to share, please do so at the end of each section. The survey will take approximately 20 minutes to complete.

*Mandatory questions

2. GENERAL QUESTIONS

- 1) What is the mandate or functions of your organization? Please select all relevant responses.*

- ☐ Legislation, regulation and rule making
- ☐ Inspection policy making
- ☐ Inspection of food business operators, facilities, farms, etc.
- ☐ Research
- ☐ Compliance Promotion
- ☐ Legal enforcement
- ☐ Registration of food establishments / facilities
- ☐ Import and/or Export control
- ☐ Auditing food inspections
- ☐ Risk assessment
- ☐ Risk management
- ☐ Risk communication
- ☐ Incident or crisis management
- ☐ Capacity building
- ☐ Other: _____

- 2) In your country, is there any national government policy, strategy, legislation or regulation that refers to vTPA programmes in food and feed safety?*

Yes ☐
No ☐
Don't know ☐

If yes, please provide additional information:

- 3) Does your organization recognize, take account of and/or use information from vTPA programmes to inform or support any aspects of its official control functions for food and feed safety?*

☐ Yes
☐ No, but actively considering this for the future
☐ No, and not actively considering this for the future
☐ Don't Know

If yes, go to Q4.

If no or don't know go to Q9

- 4) Why does your organization recognize, take account of and/or use vTPA programmes? Please rank the following reasons in order of importance, with 1 for most important, 2 for the second most important, etc.*

☐ Contributes to compliance with regulations
☐ More efficient and effective use of public budget
☐ Reduction in the regulatory burden for food industry
☐ To establish consumer trust in the safety of food
☐ Avoid unnecessary duplication of controls
☐ Limited government capacity/resources for oversight

- 5) Which areas of food and/or feed safety are covered by a vTPA programme in your country? Please select all relevant responses.*

☐ Primary production
☐ Manufacturing / General food hygiene checks
☐ Feed safety
☐ Specific value chain (e.g. dairy, eggs, meat, fish)
☐ Don't Know
☐ Other

Please specify the value chain or any other areas covered:

- 6) What types of vTPA programmes does your organization recognize, take account of and/or use in some way?*

☐ Internal company assurance systems
☐ Company supply chain quality assurance systems (food firm standard)
☐ GFSI-recognized food safety certification programmes (such as GlobalGAP, BRC, SQF)
☐ Assurance systems from industry associations (e.g. butchers, fruit juice producers, catering)
☐ Private export certification schemes
☐ Private assurance schemes for good agricultural practices (GAP)
☐ Don't know

Please provide information on any other types of vTPA programmes that are recognized:

- 7) In what ways, does your organization recognize and/or take into account participation in a voluntary third-party assurance programme? Please select all relevant responses.*

☐ Adapted frequency of inspection visits

- ☐ Adapted scope of inspection
- ☐ Use of private audit data for public inspection
- ☐ Adapted intervention or sanction policy
- ☐ No site inspections, only system audits
- ☐ Don't know

Please provide any additional information below:

- 8) What does your organization do to assess the reliability of the information/data that is generated through vTPA programmes so that it can be used to improve the national food control system?*

- ☐ Assess the governance structure of the vTPA
- ☐ Assess alignment of the vTPA programme with legal requirements
- ☐ Assess the skills/competencies of private auditors
- ☐ Don't know

Please provide any additional information:

- 9) What in your opinion are the main benefits (if any) of cooperation between the public sector and vTPA programmes? Please select up to three responses.*

- ☐ Overall improvement of food hygiene and safety
- ☐ Assisting food business in complying with the law
- ☐ Added inspection capacity (private audits)
- ☐ Public controls can focus on high risks
- ☐ Increased confidence in the level of compliance through access to vTPA information and data

Please describe any other benefits or add any other comments:

- 10) What in your opinion are the main disadvantages or risks (if any) of cooperation between the public sector and vTPA programmes? Please select up to three responses.*

- ☐ Private assurance systems are not reliable
- ☐ Conflicts with legal obligations
- ☐ Confidentiality of private audit reports
- ☐ Regulatory capture (public authorities become dominated by industry)
- ☐ Undermines consumer confidence in government authorities charged with safeguarding public health
- ☐ Financial costs for food business operators

Please specify any other disadvantages or risks; or add any other comments:

- 11) Please provide any additional information or views on the contribution or role of vTPA programmes as part of the national food control system:

3. INSPECTION-SPECIFIC QUESTIONS

- 12) Do food business operators in your country have to register, or be licensed, with a national government authority prior to commencing their operation?*

- Yes ☐
 No ☐
 Don't know ☐

If yes, what information do they have to provide?

- 13) Does your organization conduct any initial inspection before approving a food business operator?*

- Yes ☐

- No ☐
Don't know ☐

14) Does your organization consider the information received on food business operators from certification bodies in your inspection policy?*

- Yes ☐
No ☐
Don't know ☐

If yes, please briefly explain how this information is considered, and the contribution (positive and/or negative) it brings:

15) Does your organization subcontract external/third parties to conduct inspection services on its behalf?*

- ☐ Yes
☐ No
☐ No, but considering this for the future
☐ Don't know

16) If your organization subcontract external/third parties to conduct inspection services on its behalf, please specify whether:*

- ☐ The service provider must be nationally accredited
☐ The service provider must be accredited by a body which is signatory to the International Accreditation Forum (IAF) Multilateral Recognition Arrangement (MLA).
☐ It is done regardless of the accreditation status
☐ Don't know

17) If your organization subcontract external/third parties to conduct inspection services on its behalf, please specify in which areas:*

- ☐ Export / import / border / port inspection
☐ Inspection of food manufacturers, food business operators, food facilities
☐ Inspection of hospitality providers
☐ Don't know

Please add any additional area(s) below or include any other comments:

18) Please provide any additional information or comments related to food inspection:

4. QUESTIONS ON DATA SHARING PRACTICES

19) Do voluntary third-party assurance programmes and/or certification bodies share information/data with you or your organization? Please select all the responses that apply:*

- ☐ Yes, voluntary third-party assurance owners (also called Certification Programme Owners (CPOs) by GFSI) share information with my organization
☐ Yes, certification bodies directly share information with my organization
☐ No, go to Q22
☐ No, but planning this for the future. Go to Q23.
☐ Don't know. Go to Q23.

20) What kind of information is shared by voluntary third-party assurance programmes and/or certification bodies?*

- ☐ Names of food businesses that participate in the programme (issuing of certificates and withdrawal of certificates)
☐ Major non-conformities and details of remedial actions

- ☐ All non-conformities and details of remedial actions
- ☐ All audit reports
- ☐ Specific audit reports on request
- ☐ Audit results on aggregate level
- ☐ Information indicating possible serious threats to public health/safety of food
- ☐ Information on the total number of completed assessments
- ☐ Information on the number of overdue inspections that are outstanding
- ☐ Don't know

Please add any additional information below:

21) Is this sharing of information part of some formal arrangement?*

- ☐ Memorandum of understanding
- ☐ Contract or other legal obligation
- ☐ Other formal arrangement
- ☐ No formal arrangement about sharing of information
- ☐ Don't know

22) What are the reasons (if any) that limit vTPA programmes and/or certification bodies from sharing information/data with you or your organization? Please explain.

23) Do you or your organization share information with vTPA programmes and/or certification bodies?*

- ☐ Yes, with vTPA programme owners
- ☐ Yes, with certification bodies
- ☐ No
- ☐ No, but planning to do this in future
- ☐ Don't know

If yes, go to Q24.

If no or don't know go to Q25

24) What kind of information do you share:*

- ☐ Names of certified food businesses found non-compliant
- ☐ All inspection results
- ☐ Aggregated inspection results
- ☐ Data on food safety trends, challenges or systemic problems identified through inspections
- ☐ Information indicating possible serious threats to public health/safety of food
- ☐ Public information on food safety incidents
- ☐ Confidential information on food safety incidents
- ☐ Complaints about firms, auditors, certification bodies or assurance programmes
- ☐ Don't know

Please add any additional relevant information below:

25) Is there any national law / regulation in place for data privacy?*

- Yes ☐
- No ☐
- Don't know ☐

26) Please provide any additional information or comments on data sharing which might be important for vTPA programmes:

5. QUESTIONS RELATED TO CERTIFICATION BODIES

27) Does your country have a National Accreditation Body?*

- Yes ☐

No ☐

Don't know ☐

If yes, go to Q28.

If no or don't know go to Q30.

28) Please indicate the name of the body:

29) Is the National Accreditation Body affiliated (e.g. member, associate member, observer) to any international/regional accreditation body?*

☐ Yes, to the International Accreditation Forum (IAF)

☐ Yes, to a regional accreditation body

☐ No

☐ Don't know

30) Does your organization know about the activities (auditing, training and awareness raising) undertaken by certification bodies in your country?*

Yes ☐

No ☐

Don't know ☐

If yes, how do you receive this information? \$

31) Does your organization have any interactions with certification bodies?*

Yes ☐

No ☐

Don't know ☐

Please provide any additional information on the nature of these interactions:

32) Is it compulsory for certification bodies to register with the competent authority prior to launching their operations in your country?*

Yes ☐

No ☐

Don't know ☐

If yes, go to Q33

If no or don't know go to Q34.

33) Do certification bodies have to pay a fee for this registration?*

Yes ☐

No ☐

Don't know ☐

34) Do certification bodies provide any information to your organization on audited food business operators and their non-conformities?*

Yes ☐

No ☐

Don't know ☐

If yes, go to Q35.

If no or don't know go to Q36.

35) Do they also provide information on the outcomes of visits to follow-up on these non-conformities?*

- Yes ☐
No ☐
Don't know ☐

36) Are there clearly defined measures or consequences (e.g. fines or suspension of operations) for certification bodies or vTPA programmes that fail to provide adequate assurances on the compliance of businesses or that misguide regulators?*

- ☐ Yes, there are clearly defined measures described in an official document.
☐ Yes, there are consequences but measures are not described in an official document.
☐ No, there are no measures or consequences
☐ Don't know

If yes, go to Q37.

If no or don't know go to Q38.

37) Please share additional information (e.g. nature of measures, types of follow-up actions taken by your organization):

38) Would you like to share any additional information or comments related to any of the questions in this survey or the topic of vTPA programmes?

39) To help us better understand the responses to this survey, please complete the following:*

Your organization:

Your country:

40) If you would like to receive the report of survey responses, pls provide your name and email address:

Name:

E-mail:

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