



Faculty of Agriculture
and Food Sciences



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FOUNDATIONS OF A ROBUST, RISK- BASED AND PREDICTABLE FOOD REGULATORY SYSTEM

Supporting the Development of SPS Strategies
Across Africa

*30 September 2026 • Third Meeting of the African Food
Regulatory Forum (AFRAF)
Cairo, Arab Republic of Egypt*

A Food Regulator is NOT ONLY a Public Health Actor



Food Safety at the Intersect of the
Agriculture, Health and Trade Agendas

Impact on Several Policy Agendas

Health and Consumer Protection

Agriculture / Agri-Food / Food Industry

Trade

Domestic and International

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Codex Alimentarius: The Anchor for Food Safety Standards



Mandate of Codex: protecting the health of consumers and ensuring fair practices in the food trade

Codex standards are the recognized international benchmark for food safety measures under the WTO SPS Agreement

Guidance from the Codex Alimentarius Commission: The International Reference

- ❑ **CXG 82-2013** – Principles and Guidelines for National Food Control Systems: 13 principles to design, review and strengthen national systems
- ❑ **CXG 62-2007** – Working Principles for Risk Analysis for Food Safety: a documented, science-based decision-making process applied by governments
- ❑ **Science-based international standards:** food additives (GSFA), contaminants, residues, hygiene, labelling – developed openly, with all Members and observers
- ❑ **Alignment with Codex** builds national credibility, supports regional convergence and facilitates access to international markets

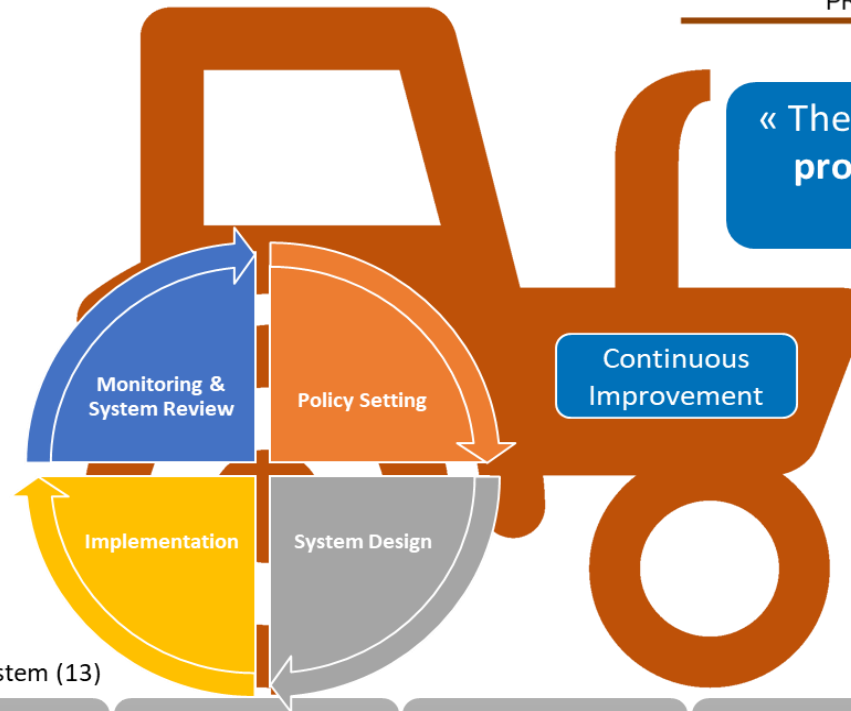
Effective Food Control Systems (FCS) are Guided by Codex Direction



PRINCIPLES AND GUIDELINES FOR NATIONAL FOOD CONTROL SYSTEMS

CAC/GL 82-2013

« The objective of a national food control system is to protect the health of consumers and ensure fair practices in the food trade »



Principles of a National Food Control System (13)



(Codex, 2013)

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Guidance from the WTO SPS Agreement and the SPS Committee

- ❑ **Science and risk assessment:** SPS measures must be based on scientific principles and on an assessment of risk (Articles 2 and 5)
- ❑ **Harmonization:** Codex standards are the recognized international benchmark for food safety measures (Article 3)
- ❑ **Transparency:** advance notification of proposed measures, enquiry points, opportunity for trading partners to comment (Annex B)
- ❑ **Equivalence and non-discrimination:** accepting different measures that achieve the appropriate level of protection (Article 4)
- ❑ **The SPS Committee:** the forum where specific trade concerns are raised and implementation guidance is developed

WTO SPS Agreement – Article 5: Key Obligations

Assessment of Risk and Determination of the Appropriate Level of Sanitary or Phytosanitary Protection

- 1 Based on an assessment of risk** – to human, animal or plant life or health, using risk assessment techniques developed by the relevant international organizations (Art. 5.1)
- 2 Grounded in available scientific evidence** – together with production methods, inspection, sampling and testing methods, prevalence of diseases or pests, and ecological conditions (Art. 5.2)
- 3 Minimizing negative trade effects** – when determining the appropriate level of protection (Art. 5.4)
- 4 Consistency** – avoiding arbitrary or unjustifiable distinctions in the levels of protection considered appropriate in different situations (Art. 5.5)

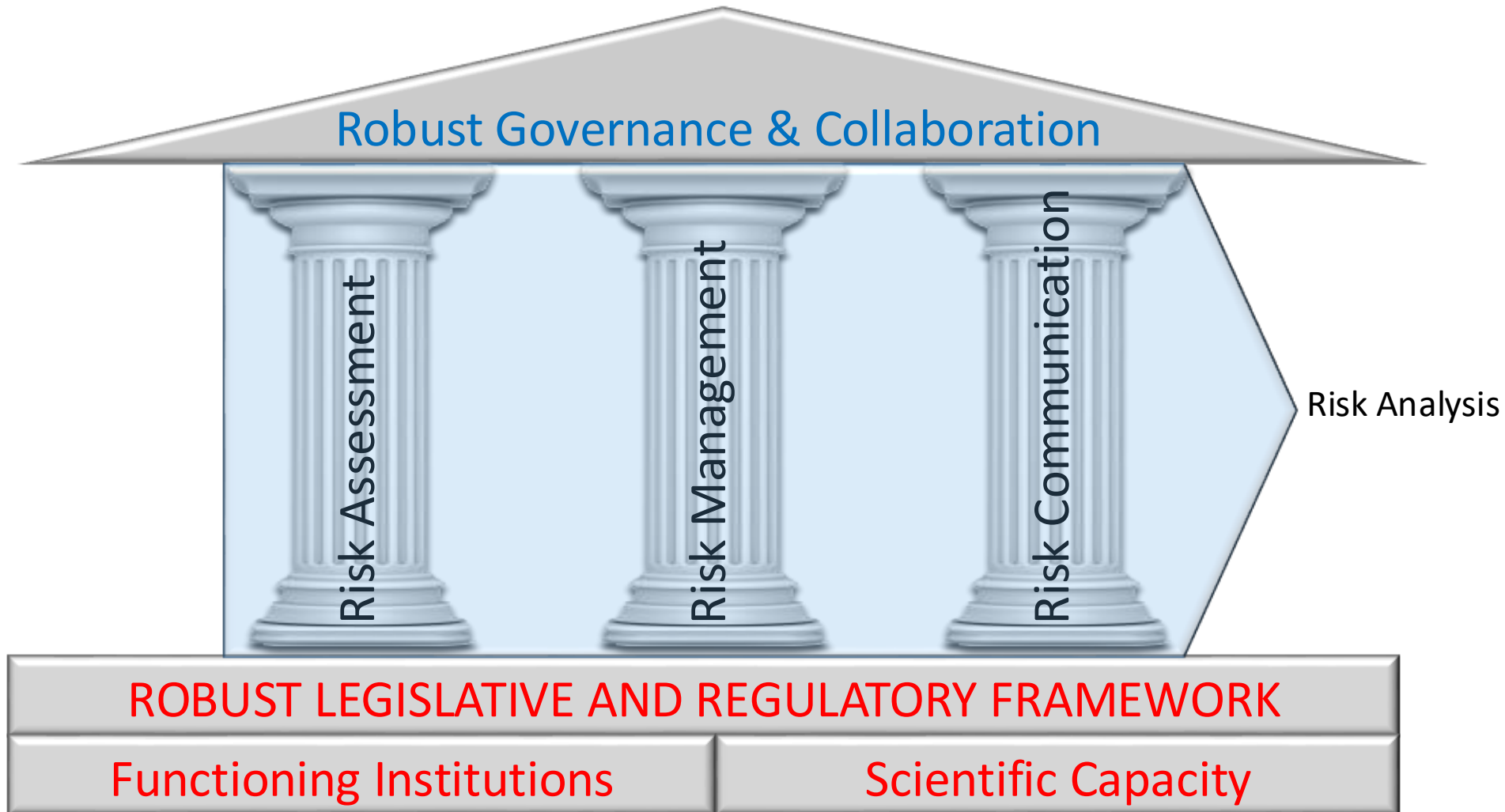


Features of a Successful / Impactful Food Regulatory Regime

- ☐ Predictable
- ☐ Inclusive / Collaborative
- ☐ Transparent
- ☐ Science and Risk Based
- ☐ **Enabling to Food Innovation**

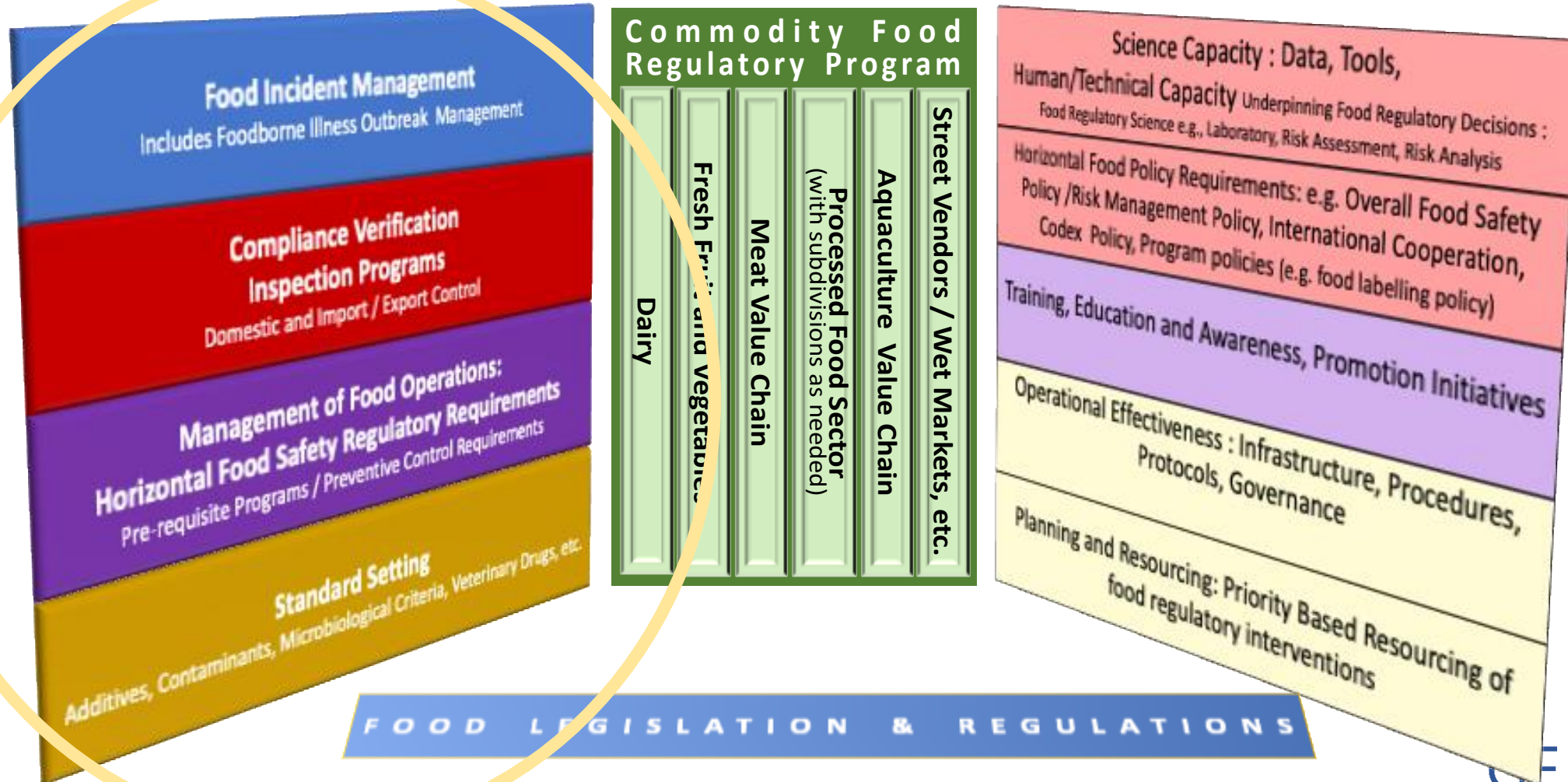


Effective Food Control Programs



*Guided by the 13
Principles of
CXG82-2013*

Key Food Regulatory Functions Explored



Robustness Requirements: Complete Functions, Full Coverage, No Gaps

- ❑ **Four core functions operating as one connected system:** product rules (composition, additives, contaminants, labelling); establishment rules for food business operators; compliance verification (inspection, surveillance, import/export control); incident management (rapid response, recalls)
- ❑ **A supervision chain matching the value chain:** standards, registration/approval, process oversight, market inspection, surveillance, recall – from farm to consumer
- ❑ **Gaps and overlaps in oversight create avoidable risks** and undermine trust in the whole system
- ❑ **Institutional models can differ – coordination cannot:** single or multiple authorities, the test is the absence of gaps, overlaps and weak information flows

A Trustworthy System Acts on a Public Mandate

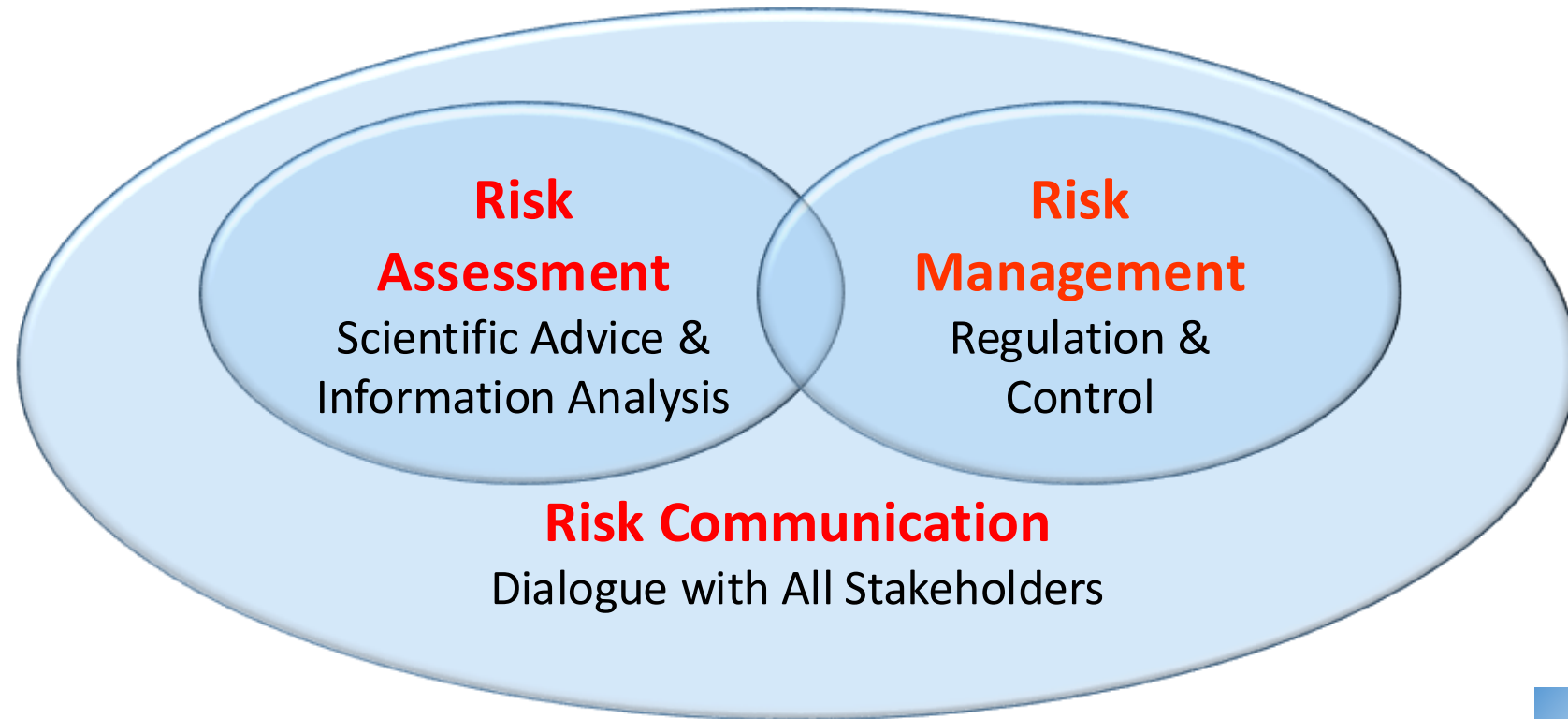
- ☐ **Consumers delegate authority to regulators through food legislation** – assurance and trust are the deliverables
- ☐ **Decisions must be transparent, proportionate, evidence-based and defensible** – especially when the system is tested
- ☐ **Crisis preparedness is part of regulatory credibility:** rapid alert, recall and communication capacity
- ☐ **Responsibility is shared:** industry bears primary responsibility for safe food; regulation organizes, verifies and enforces that responsibility
- ☐ **Trust is sustained by performance monitoring and system learning,** not by enforcement alone

Strengthening Food Risk Analysis as the Foundation of Decision Making

- ❑ **Risk Analysis** is the **logical framework** that underlies **decision-making** concerning all kinds of risks (not only for food safety and nutrition)
- ❑ Food Risk Analysis is An **iterative and highly interactive** process that should be followed by food **decision-makers** to address food safety and nutrition issues, using **robust evidence**, including **scientific information** and regular exchange with all parties and stakeholders involved
- ❑ Creates Predictability

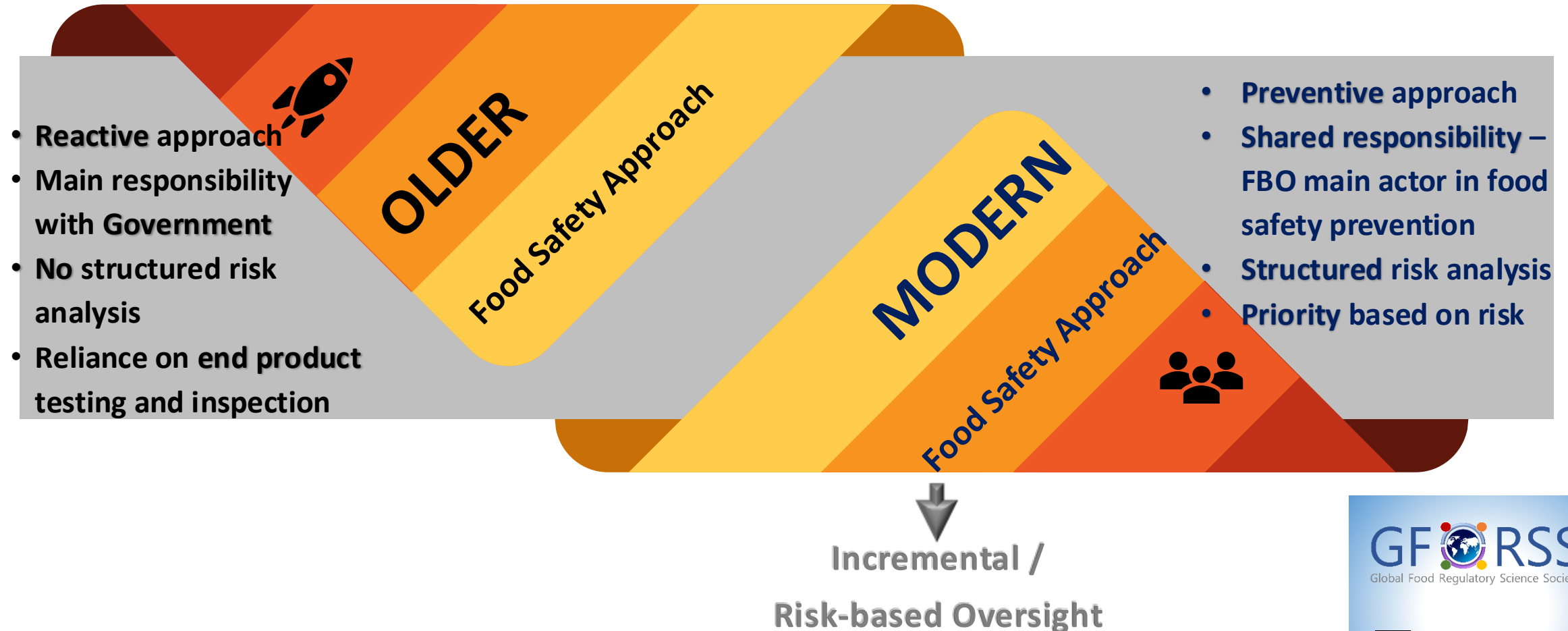


Risk Analysis Paradigm Provides Structure



Robust Food Decisions

Evolution of Food Regulatory Interventions: From Reactive to Preventive



Risk-Based Decision-Making Means Three Things

- 1 Risk analysis is the basis of decision-making:** the process is codified, anchored in evidence and science – ensuring trustworthiness and predictability.
Inverting roles, on the same evidence, we would reach the same conclusions
- 2 The risk management decision is proportional to the risk:** the intensity of the intervention matches the level of risk – *we do not kill a mosquito with a hammer*
- 3 Prioritization of action on food issues is based on risk:** risk determines importance – public health risk first, together with other legitimate considerations (mandates, feasibility, costs, stakeholder concerns)

Acting on the Basis of Risk and Not Hazard

Hazard



Risk



The difference is the EXPOSURE

Taking Into Account Exposure

**Occurrence in
Food**



**Food
consumption**



Proportionality: The Intervention is Commensurate to the Risk

*The **Impact** of the
Food Regulatory Decision is
Commensurate to
the **Level of Risk***



Risk-Informed Decision-Making: A Working Definition



Working Definition for a Risk-Informed Decision-making System

*A systematic means by which to facilitate **decision making** to reduce **public health risk** in light of **limited resources** and **additional factors** that may be considered.*

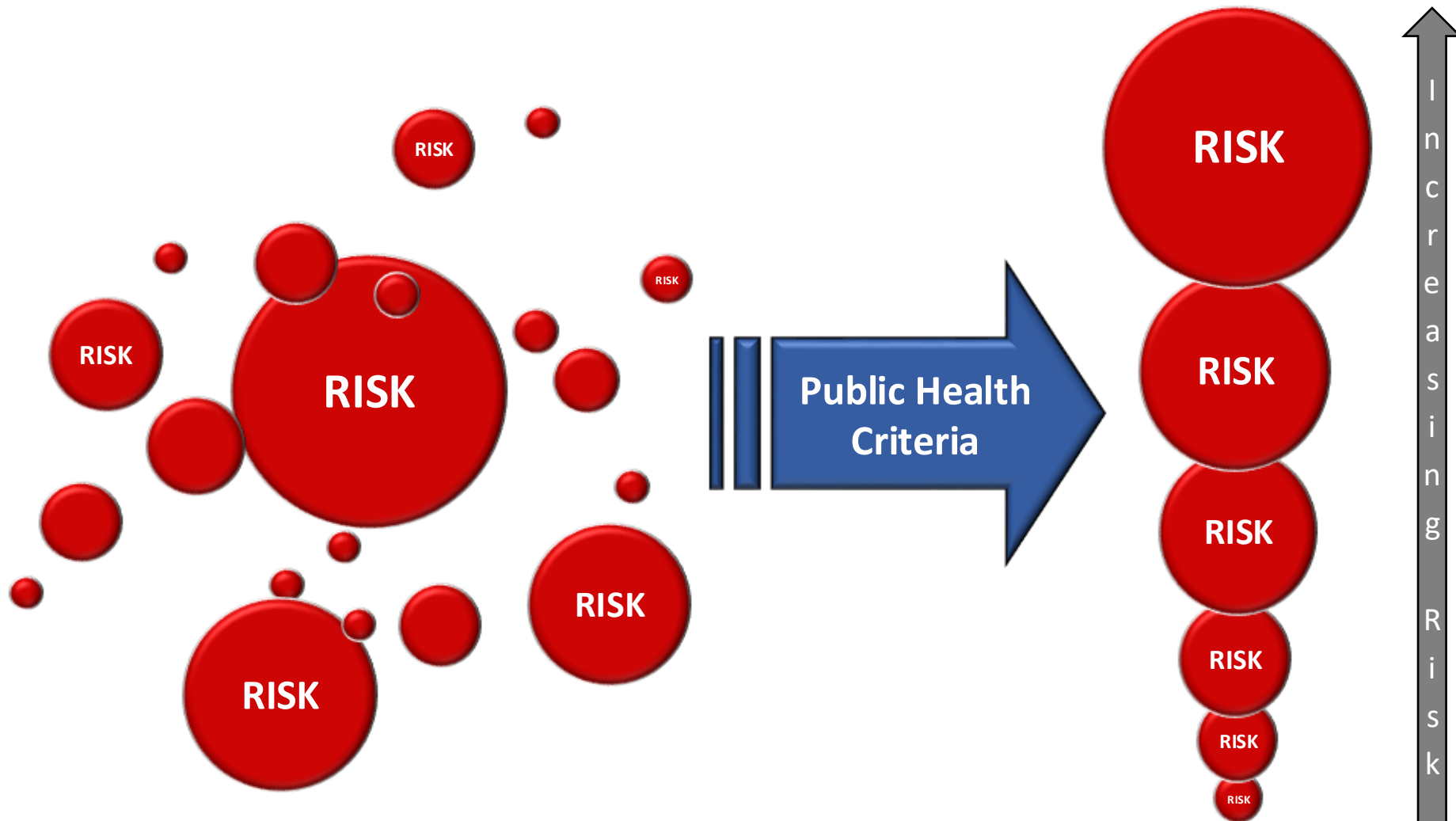


*Enhancing Food Safety
(IOM/NRC 2010)*

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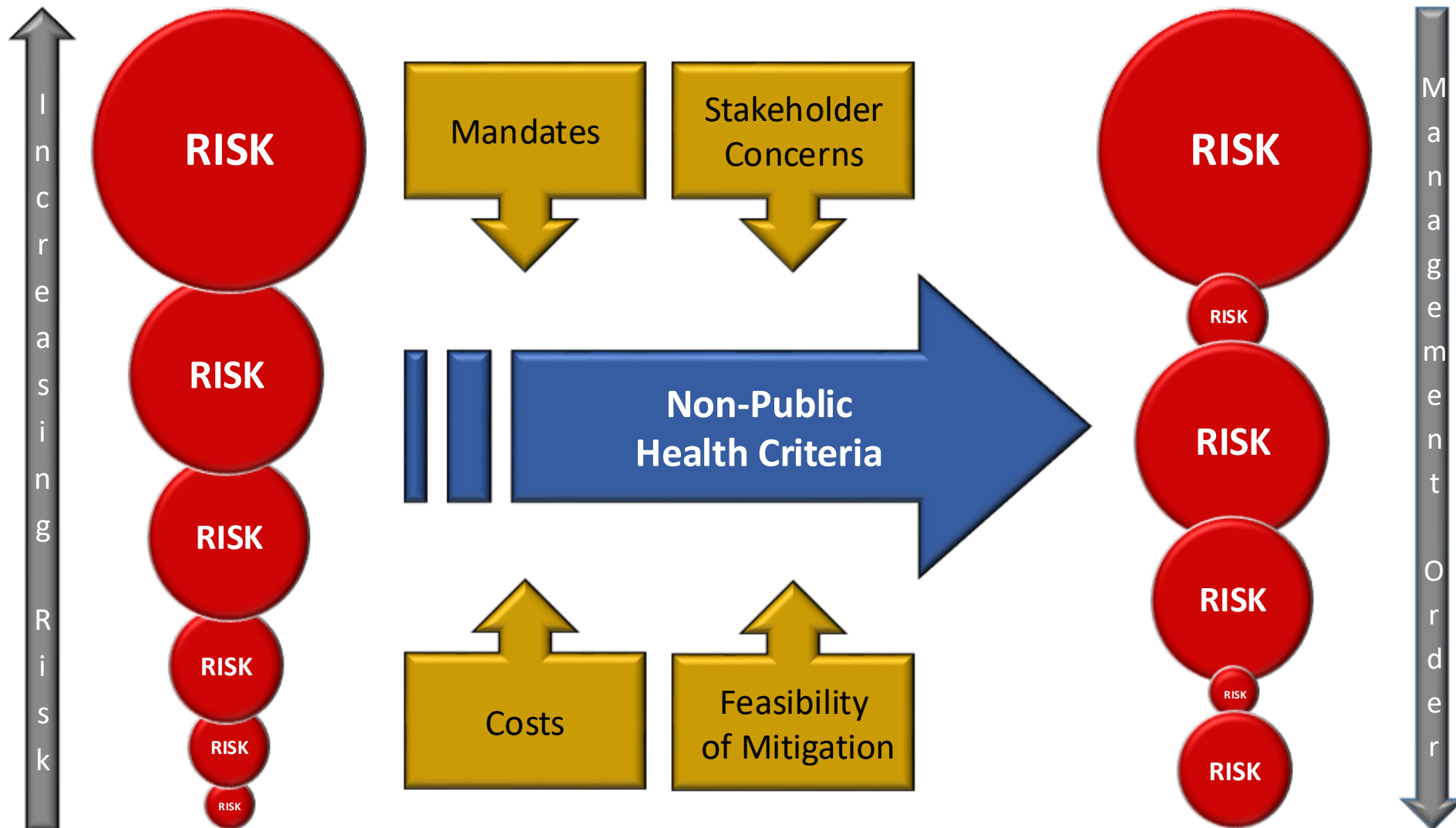
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First Stage Risk Ranking



The Relative Risk of Multiple Hazards are Ranked Based on Public Health Outcomes

Risk-Informed Prioritization



*Risk Management
Decision-making
May Consider
Additional Factors*

An Inclusive System: Clear Forums for Stakeholder Intervention and Contribution

Stakeholder engagement is a design feature of the risk analysis framework – iterative risk communication with all interested parties, not a courtesy



Public consultations

On proposed standards and measures, with defined comment periods and published outcomes



National Codex Committee & mirror committees

Structured input into international standard-setting positions



Scientific advisory bodies

Drawing on academia and independent expertise – separated from risk management



Industry, consumers & academia

Contribute at known points of the process – each with a recognized role

Predictability applies to participation too: stakeholders know when and how to contribute

Reviewing and Re-Designing Food Control Systems

Food safety issues are multi-faceted and interventions are costly. **Where possible:**



Evaluation closes the loop: sector and value-chain experience feeds back into national regulatory modernization

A Culture of Regulatory Quality: The Questions We Routinely Ask

What is the evidence?

What is the risk?

What is the international benchmark?

Is the intervention proportionate?

Are comparable cases treated consistently?

Have authorities and stakeholders been engaged?

Can the decision be explained and implemented?

Is it reached within a reasonable timeframe?

Formal procedures alone do not guarantee regulatory quality – **Culture** does. It requires sustained investment in regulatory science, competencies, data and continuing education.

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Drivers of Change: A New Continental SPS Landscape

AfCFTA – African Continental Free Trade Area

A single continental trade ambition: SPS systems that facilitate the safe movement of food and agricultural products and reduce unnecessary barriers (Annex 7 on SPS Measures)

African Union SPS Policy Framework

Continental direction toward harmonized, science- and risk-based SPS systems, stronger technical capacity, lower trade costs and coordination among Member States and RECs

Food Safety Strategy for Africa

Food safety as a continental priority: coordinated food control systems and collective action at national, regional and continental levels

Kampala CAADP Strategy & Action Plan 2026–2035

Post-Malabo Comprehensive Africa Agriculture Development Programme: SPS within agrifood system transformation – production, agro-industrialization, intra-African trade, food security, resilience, governance

The implication for RECs: ALIGN AND OPERATIONALIZE

Regional SPS strategies bridge continental commitments and national implementation – common priorities, coordinated interventions and a practical roadmap for regulatory convergence and trade facilitation

Why Do We Need an SPS Strategy?

1

A common direction

For SPS decision-making across countries, regions and ultimately the continent – greater regulatory coherence and predictability

2

Anchored in science and risk

SPS measures based on science, evidence and risk analysis – achieving their primary objective of protecting consumers, animal and plant health

3

An enabler – not an impediment – to trade

Reducing avoidable regulatory and technical barriers and facilitating the movement of safe food and agricultural products

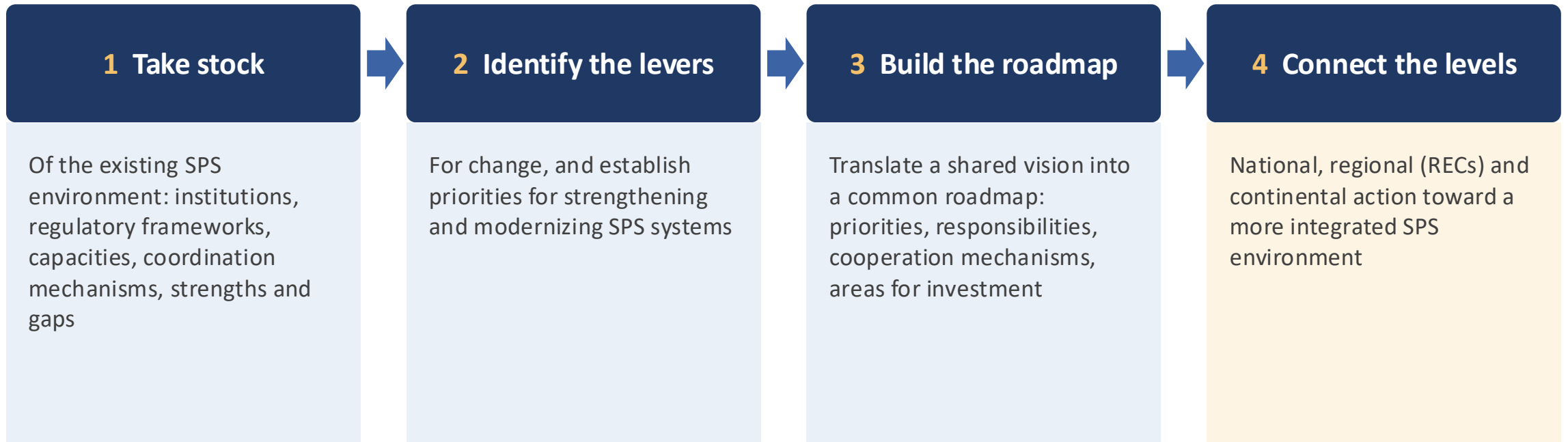
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Sector development and competitiveness

A more predictable regulatory environment for producers, processors and traders in the food, agri-food and agricultural sectors

Protecting consumers while facilitating safe trade and economic development

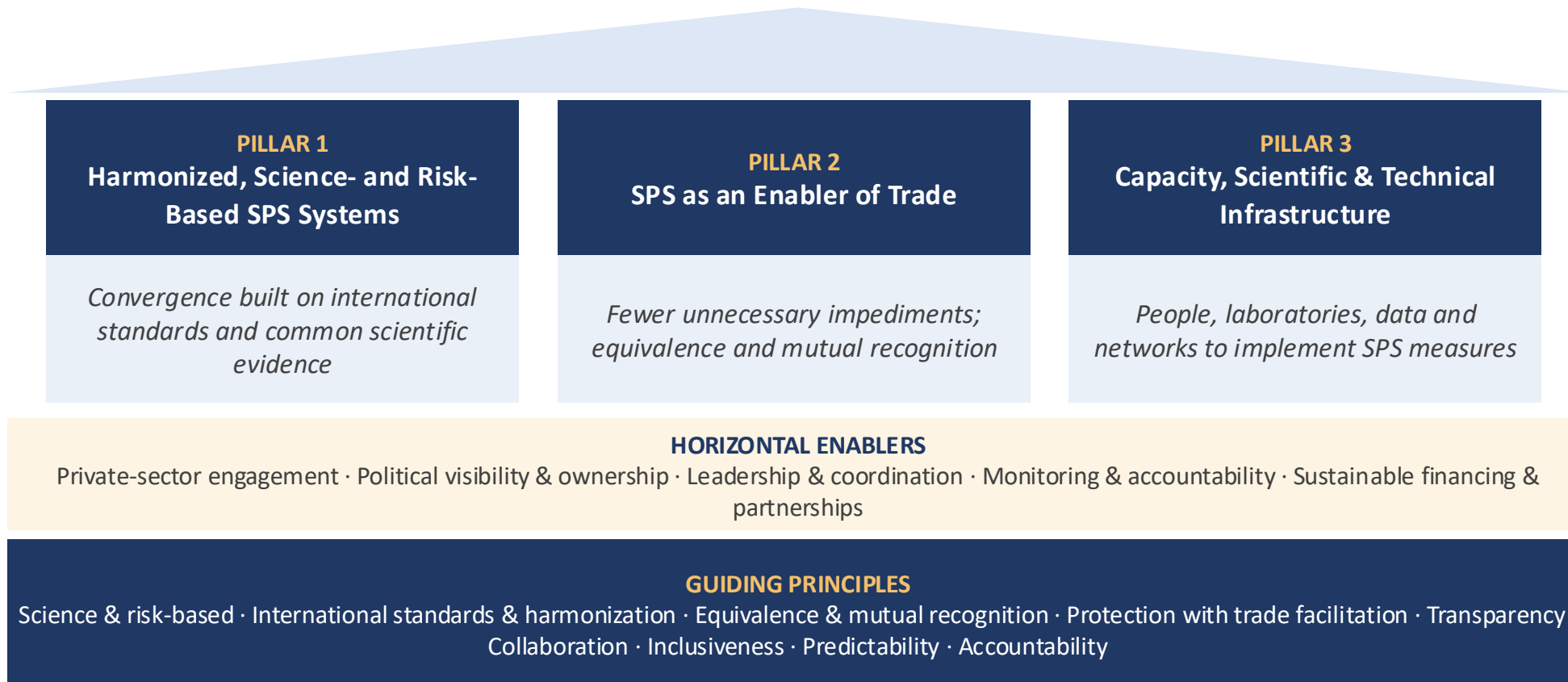
What an SPS Strategy Does: From Stock-Taking to a Shared Roadmap



*A shared vision → **a common roadmap for action***

Proposed SPS Strategic Architecture

Three mutually reinforcing pillars – supported by horizontal enablers and common principles



The Three Pillars: Priority Actions

PILLAR 1

Harmonized, Science- and Risk-Based SPS Systems

- ☐ Assess the current SPS and regulatory landscape
- ☐ Map differences in requirements, decision-making and implementation
- ☐ Identify recurring regulatory and trade frictions
- ☐ Prioritize measures for convergence and harmonization
- ☐ Align with international standards and rely on common scientific evidence

PILLAR 2

SPS as an Enabler of Trade

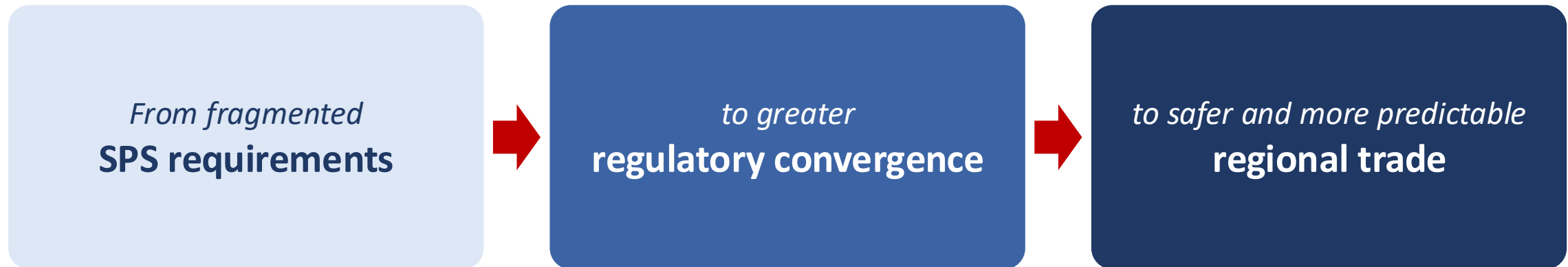
- ☐ Identify and remove unnecessary SPS-related trade impediments
- ☐ Strengthen regulatory dialogue and cooperation
- ☐ Advance equivalence and mutual recognition of measures, inspections, results and certificates
- ☐ Increase assurance at origin to reduce duplicative controls at destination
- ☐ Deploy digital certification, data exchange and streamlined border processes

PILLAR 3

Capacity, Scientific & Technical Infrastructure

- ☐ Strengthen regulatory, scientific and risk-analysis capacity
- ☐ Develop laboratory and conformity-assessment capabilities
- ☐ Build sustainable regional networks and communities of expertise
- ☐ Strengthen data generation, sharing and use
- ☐ Invest in the institutional and human capacity to implement SPS measures

From Fragmentation to Convergence



Risk analysis as the common foundation – **proportionate, predictable, transparent** decisions aligned with international standards

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