

## EatSafe: Evidence and Action Towards Safe, Nutritious Food

# Review of Food Safety Policy and Legislation in Ethiopia

January 2022













This EatSafe report presents evidence that will help engage and empower consumers and market actors to better obtain safe nutritious food. It will be used to design and test consumer-centered food safety interventions in informal markets through the EatSafe program.

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## ACRONYMS AND ABBREVIATIONS

| ASF     | Animal source foods  |
|---------|--|
| EatSafe | Evidence and Action Towards Safe, Nutritious Food  |
| EFDA    | Ethiopia Food and Drug Authority   |
| EHPI    | Ethiopian Public Health Institute  |
| FMHACA  | Food, Medicine and Health Care Administration and Control<br>Authority (Addis Ababa City Government) |
| FNC     | Food and Nutrition Council (Ethiopia)  |
| FNP     | Food and Nutrition Policy (Ethiopia, 2018)   |
| GAIN    | Global Alliance for Improved Nutrition   |
| GAP     | Good Agricultural Practice   |
| GHP     | Good Hygienic Practice   |
| GMP     | Good Manufacturing Practice  |
| HACCP   | Hazard Analysis Critical Control Point   |
| MoA     | Ministry of Agriculture (Ethiopia)   |
| MoH     | Ministry of Health (Ethiopia)  |
| MoTI    | Ministry of Trade and Industry (Ethiopia)  |
| MOU     | Memorandum of Understanding  |
| USAID   | United States Agency for International Development   |
| SNNPR   | Southern Nations, Nationalities and Peoples Region (Ethiopia)  |

## **EXECUTIVE SUMMARY**

Food safety is an important public health issue in Ethiopia, as foodborne disease disrupts the lives of consumers due to high rates of adulteration and unhygienic food handling practices across the food value chain. EatSafe: Evidence and Action Towards Safe, Nutritious Food (EatSafe) conducted this review to analyze existing food safety policy, regulations, and standards at the national, regional, and local levels in Ethiopia.

This report provides an overview of the legislative and policy landscape for food safety in Ethiopia, based on a desk review of primary policy documents as well as 13 key informant interviews with stakeholders in relevant Ministries. It evaluates specific strengths and limitations of five federal Proclamations (i.e., regulations) and one Addis Ababa City regulation. It also examines policies from the newly established Sidama Regional State because EatSafe is expected to operate in Hawassa. It concludes with three overarching considerations to improve Ethiopia's food safety system.

The country's constitution recognizes the importance of food safety, clearly placing the responsibility of maintaining the safety of food on the state as well as considering it as a fundamental human right. However, responsibility for food safety regulations, compliance, and inspection in Ethiopia is fragmented and disjointed across different ministries and executive governing bodies. Food safety authorities are distributed between several Ministries – most notably, the Ethiopian Food and Drug Authority within the Ministry of Health, the Ministry of Trade and Industry, and the Ministry of Agriculture – as well as their respective regional offices, local authorities, and municipalities. At present, no integrated coordination mechanism exists to clarify overlaps or gaps in food safety regulations. The fragmentation of regulatory authorities was also observed in compliance and inspection activities. A lack of training for government personnel in food safety best practices (e.g., Good Agricultural Practices, Good Hygienic Practices, and Hazard Analysis Critical Control Point best practices) has led to reduced supervisory competence and low levels of food safety expertise in Ethiopia's regulatory authorities.

This review found that EatSafe's primary focus – traditional food markets – are almost entirely unregulated, classified as "illegal trade" in Ethiopia. By contrast, most food safety laws and regulations focus only on *formal* food sectors, overlooking traditional market settings. Given this categorization, traditional market vendors and other food handlers are not required to have official training in food safety best practices prior to obtaining a vending license. This lack of regulation is compounded by relatively low public knowledge on the impact of unhygienic food safety behaviors. There are no consumer platforms or associations through which Ethiopian consumers can advocate or educate others on food safety best practices. The results of this review indicates that EatSafe has an important opportunity to pilot consumer-driven interventions to improve the safety of nutritious foods in traditional markets in Ethiopia. Given the multi-sectoral and multi-disciplinary nature of food safety systems, one pathway to harmonization may be through greater consumer demand for food safety.

## I. INTRODUCTION

An effective food safety system is vital to safeguard the public from unsafe food and its associated detrimental health consequences. It can also benefit a country's economy by increasing agricultural exports. As an important government function, there are many public policy tools to guide governments in establishing systems for ensuring food safety and quality.<sup>1</sup> These guidance tools reflect a comprehensive and integrated farm-to-table approach in which all value chain actors could play vital roles.

Food safety, or the assurance that food will not cause consumers harm when it is prepared or eaten according to its intended use, is integral to food and nutrition security.<sup>2</sup> Food safety is a critical challenge in Ethiopia because it is unclear which solutions are best suited to the Ethiopian context. It is also a rising priority as development practitioners promote nutrient-dense, yet highly perishable foods (e.g., animal source foods, fresh vegetables), particularly among vulnerable populations.<sup>3</sup>

Most Ethiopian foods are sold in traditional (i.e., informal or wet) markets, which generally have lower prices than formal markets and are closer to consumers' homes. Consumers often favor traditional markets because local varieties of animal source foods (e.g., fish and livestock) are sold, which are perceived as fresh and tasty. Further, consumers trust vendors they interact with socially in the community; vendors may also facilitate credit or other services to provide consumers flexibility in payment.<sup>4</sup> Despite their many benefits, traditional markets pose significant food safety risks because they often lack the necessary infrastructure for safe food. In lieu of health and safety regulations and associated compliance measures, vendors in traditional markets are often unlicensed and lack training on optimal food safety practices.

As a program of the U.S. Agency for International Development, EatSafe: Evidence and Action Towards Safe, Nutritious Food (EatSafe) aims to enabling lasting improvements in the safety of nutritious foods in traditional markets by focusing on consumer demand. As a precursor to EatSafe implementation in Ethiopia, this review of existing food safety policy and legislation in Ethiopia provides important background to understand the enabling environment for food safety. The specific objectives of this review are to:

- 1. Assess the content, scope, structure, and institutional landscape of existing food safety policy and legislation in Ethiopia;
- 2. Identify gaps and considerations to improve implementation of Ethiopia's 2018 Food and Nutrition Policy; and
- 3. Provide relevant information to guide EatSafe in the design of appropriate intervention related to the safety of food in traditional Ethiopian market settings.

## I.I. SCOPE

The review focuses on Ethiopian food safety policy, regulations, and legislative frameworks at the national and regional levels.<sup>a</sup> Because EatSafe is expected to operate in Hawassa, the review also examined food safety related documents from the newly established Sidama Regional State. Given its relevance as the national capital, the review also examined documents from the Addis Ababa City Administration as an example of existing implementation of food regulations.

## 2. METHODOLOGY

This review leverages two methods: a literature review and key informant interviews. First, EatSafe conducted an inventory of information, sourced from official websites of organizations in the food safety sector, obtaining policy, regulation, proclamation, directives, and guidance documents published by the various Ministries and Authorities at the federal, regional, and local levels throughout Ethiopia. To fulfill the second objective of this review (i.e., identify gaps in food safety policy), the documents were reviewed for their alignment with key food control systems guidelines as recommended by the Food and Agriculture Organization of the United Nations and World Health Organization (FAO and WHO, respectively).<sup>5</sup> The FAO and WHO guidelines were developed to assist national authorities to improve their food control systems.

In addition to the literature review, EatSafe conducted 13 key informant interviews with relevant stakeholders in 11 target institutions for food safety control system at both the national and regional levels. <u>Appendix 1</u> contains the list of interviewed stakeholders.

## 3. EXISTING NATIONAL COMMITMENTS TO FOOD SAFETY POLICY

Ethiopia's Constitution emphasizes the importance of food safety, clearly identifying the state's responsibility in maintaining the safety of national food supplies.<sup>6</sup> In recent years, Ethiopia has made limited, but encouraging, regulatory efforts at the federal level to address foodborne illness and illegal food marketing practices (e.g., adulteration, counterfeiting, misbranding) that negatively impacts public health and the economy. Further, in 2018, Ethiopia's federal government developed a Food and Nutrition Policy (FNP) that identified food safety and nutrition as a governmental responsibility.

Among the FNP's seven objectives for food and nutrition is one that seeks to "to improve the safety and quality of food throughout the value chain" – a goal that creates an enabling policy framework for strategies, laws, and regulations related to the safety

<sup>&</sup>lt;sup>a</sup> Local policy documents were beyond the scope of this review.

of food across the food system. While the FNP is not specific to food safety, it strengthens the food safety legal environment, as shown in the following quote:

"Based on the principles of farm to table and life cycle approach, the policy will give a framework to provide guidance to any food and nutrition related critical issues at national, regional and community levels."

Given the FNP's explicit food safety objective and the enabling policy framework described above, it appears Ethiopia has the legal environment for both rules and regulatory bodies focused on food safety. However, as discussed throughout this review, food safety activities are spread across several institutions and not well coordinated at the federal level. The regulations that enable federal governing bodies to enforce food safety controls are weak, with much room for strengthening. Possible changes including amending food laws, proclamation and regulations, and directives.<sup>7,8</sup> **Table 1** includes an in-depth assessment on the strengths and limitations of the FNP.

| STRENGTHS   | LIMITATIONS  |
|---|--|
| Food safety is recognized as important: it is one of only seven objectives.   | The key legal challenge is the lack of a single consolidated federal law (i.e., there is no Ethiopia National Food Safety Law).  |
| It provides an overarching framework<br>covering the key dimensions of food safety<br>throughout the entire food system.                    | It does not provide guidance for establishment<br>of an autonomous body to coordinate food<br>safety activities of the various agencies and<br>ministries with functions related to food safety. |
| It emphasizes the need to build food safety capacity at national, regional and institutional levels.  | Food safety activities have inadequate institutional arrangements and limited resources for implementation.  |
| It recognizes the need to empower<br>communities by improving consumers'<br>food safety literacy and ability to create<br>informed choices. | Existing food safety institutions have only limited authority to deliver or enforce food safety regulations and standards.   |

Table 1. Evaluation of Ethiopia's 2018 Food and Nutrition Policy Relevant to Food Safety

## 4. FOOD SAFETY MANDATES OF NATIONAL AUTHORITIES

Of the 19 governing bodies, ministries, institutes, and agencies through which Ethiopia distributes executive powers, three ministries have the legal mandate to implement Ethiopian food and nutrition policy: the Ministry of Health (MoH), Ministry of Agriculture (MoA), and the Ministry of Trade and Industry (MoTI).<sup>9</sup> Representatives from these three ministries contribute to the National Food and Nutrition Council (FNC; **Figure 1**).



Figure 1. Food and Nutrition Policy Governance Structures in Ethiopia \*

\* *Note:* This is the structure related to national-level implementation of food safety. For food and nutrition policy, other bodies that feed into the National FNC include several other Ministries and Agencies, as well as Regional FNC, Zonal FNC, Woreda FNC, and Kebele FNC.

Each ministry has separate powers and duties related to food safety, along with the 11 independent executive bodies contained within each one (**Table 2**).

|   | ,  |
|---|--|
| POWERS AND DUTIES   | EXECUTIVE BODIES   |
| MINISTRY OF HEALTH  |  |
| <ul> <li>provide appropriate support to promote research activities intended to provide solutions for the country's health problems and for improving health service delivery;</li> <li>follow up and coordinate the implementation of national nutrition strategies;</li> <li>devise and follow up the implementation of strategies for the prevention of epidemic and communicable diseases;</li> <li>expand health education via appropriate means; and</li> <li>ensure the proper execution of food, medicine and health care administration and regulatory functions.</li> </ul> | <ul> <li>The MoH contains:</li> <li>the Ethiopian Food and<br/>Drug Authority;</li> <li>the Ethiopian Public<br/>Health Institute; and</li> <li>the Pharmaceutical<br/>Supply Agency.</li> </ul> |

Table 2. Food Safety Powers and Relevant Executive Bodies, by Ministry

| MINISTRY OF AGRICULTURE  |   |
|--|---|
| <ul> <li>establish and run training centers that assist to ensure the enhancement of agricultural development and the improvement of rural technologies;</li> <li>establish a system that ensures access to quality veterinary services to improve the prevention and timely control of animal and fish diseases;</li> <li>construct animal health laboratories in the country and build their capacity;</li> <li>establish a system to ensure that all crop, livestock, and fish, products marketed maintain the required quality; follow up the implementation of such system;</li> <li>provide technical support to create modern production systems and market linkages;</li> <li>ensure the proper execution of pesticide and animal feed quality control, and veterinary administration and regulatory activities;</li> <li>establish a system that enables the prevention of plant and animal diseases; lead research and studies necessary to this end; and</li> <li>conduct disease-control activities for plants, cereals, animals and animal products crossing Ethiopia's border.</li> </ul>  | <ul> <li>The MoA contains:</li> <li>the Veterinary Drug and<br/>Animal Feed<br/>Administration and<br/>Control Authority;</li> <li>the National Animal<br/>Health Diagnostic and<br/>Investigation Center; and</li> <li>the National Veterinary<br/>Institute.</li> </ul>   |
| MINISTRY OF TRADE AND INDUSTRY   |   |
| <ul> <li>promote the expansion of domestic trade and take appropriate measures to maintain lawful trade practices; lead and oversee trade relations between regional states;</li> <li>control the qualities of export and import goods; prohibit the importation or exportation of goods that do not conform with the required standards;</li> <li>provide simple, cost effective and technology-supported commercial registration and business licensing services;</li> <li>encourage the establishment of chambers of commerce and sectorial associations, consumers' associations, industry, sectorial and professional associations, and strengthen those which are already operational;</li> <li>control the compliance of goods with the requirements of mandatory Ethiopian standards, and take measure against those found to be below the standards applied by other enforcement bodies;</li> <li>facilitate the selection, adoption and inculcation of technology that accelerates industrial sector development;</li> <li>expedite the acquisition of best practices, technology transfer and skills development; and</li> <li>establish systems of capacity building, research and inculcation to maintain quality standards and competitiveness of industrial products in international markets; oversee implementation of the same.</li> </ul> | <ul> <li>The MoTI contains:</li> <li>the Food, Beverage and<br/>Pharmaceutical Industry<br/>Development Institute;</li> <li>the Meat and Dairy<br/>Industry Development<br/>Institute;</li> <li>the Ethiopian Trade<br/>Competition and<br/>Consumers Protection<br/>Authority; and</li> <li>the Ethiopian Standards<br/>Agency.</li> </ul> |

Considering the continuum of food from farm to table, certain areas were well covered, though others were not covered at all. For example, the MoA covers animal and plant health, while the transportation of raw food from post-harvest to the market are not covered. Therefore, raw food is transported in an unorganized and thus potentially contaminated manner. Another example is meat hygiene, whereby the slaughtering of animals for export purposes is covered by two agencies whose duties overlap: the MoA and the Ethiopia Food and Drug Authority (EFDA), which is part of the MOH. By contrast, the production of meat for domestic markets (e.g., from municipal abattoirs to local butcheries), is not covered by those agencies. Furthermore, the Ministry of Trade regulates meat butcheries' fair-trading practices and metrological (i.e., weight) issues.

### 4.1. HEALTH SECTOR

Within the Ministry of Health, the EFDA and Ethiopian Public Health Institute are mandated to execute two Proclamations related to food safety: the Food and Medicine Administration Proclamation (1112/2019)<sup>10</sup> – of which the EFDA provides sole enforcement – and Health and Health Related Institutions Proclamation (661/2009).<sup>11</sup> **Table 3** contains an analysis of the strengths and limitations of the former.

**Table 3.** Evaluation of the Food and Medicine Administration Proclamation Relevant to FoodSafety 12

| STRENGTHS  | LIMITATIONS   |
|--|---|
| It focuses on preventing health hazards caused by unsafe food consumption.   | The definition of "food trade" ignores<br>informal markets, which are marginalized,<br>not under the jurisdiction of EFDA, and thus<br>treated as illegal trade.  |
| Safety assessments are required based on<br>the potential risk of a food – consistent with<br>modern preventive approaches to food safety<br>regulation. | The definition of "foods" and "food trade<br>establishments" limit oversight to processed<br>or semi-processed foods. It neglects<br>agricultural products and does not define<br>foods outside those two categories. |
| Every food manufacturer, importer, or<br>preparer has the responsibility to ensure the<br>safety of raw material used for food<br>manufacturing.         | It neglects foods prepared and served at<br>mass catering establishments and street<br>vendors – places with poor food handling<br>and preparation practices.   |
| It provides a legal basis for the regulation of food packaging by considering potential hazards of poor-quality materials.                               | It only applies to products crossing the<br>borders of more than one region in the<br>country (i.e., "transregional products").   |
| It effectively covers the safety of processed foods.   | It provides the EFDA broad authority to<br>inspect licensed establishments, though  |
| It imposes a mark requirement for domestically produced foods.   | regulators only can inspect legal food establishments (i.e., the regulators have no   |
| It provides the legal basis for proper food<br>preparation, storage, and transportation to<br>ensure safety.   | authority to inspect informal market areas).  |
| Food establishments are obligated to impose<br>required quality control systems to ensure the<br>safety of foods it produces.                            |   |
| It provides comprehensive oversight of formal food sectors.  |   |
| Both executive bodies and food<br>establishments must conduct regular post-<br>market safety monitoring activities.                                      |   |

#### **CONSIDERATIONS**

Given current urbanization and population growth trends, current regulation could be broadened to cover informal sector, including traditional market vendors.

Rather than classifying the informal sectors as "illegal trade," regulations for food safety in traditional markets could be designed with specialized functions fit for context. Legislation could be broadened to provide governing bodies the authority to develop appropriate regulations and compliance measures.

### 4.2. AGRICULTURAL SECTOR

As the agricultural sector comprises key actors throughout the food value chain, ministries and governing bodies have a broad range of food safety assurance responsibilities. Though there are several proclamations under the authority of agricultural sector, only the three most relevant proclamations were chosen for evaluation in this review, including:

- Meat Inspection Proclamation No 81/1976 (Table 4);
- Plant Quarantine Regulation No. 4/1992 (Table 5); and
- Veterinary Drug and Feed Administration and Control Proclamation No. 728/2011 (**Table 6**).

| STRENGTHS  | LIMITATIONS   |
|--|---|
| It provides the legal basis to regulate meat and meat products intended for domestic consumption.  | It is outdated – nearly 45 years old – and does not fit current realities and contexts.   |
| It provides the legal basis to regulate food<br>establishments preparing and processing meat<br>and meat products.   | It only applies to formal markets, neglecting informal markets.   |
| It allows the Ministry of Agriculture to establish<br>legal criteria to determine the fitness of<br>livestock, carcasses, meat, and meat products<br>for human consumption.      | Its scope is narrow, only covering livestock<br>meat. It neglects other animal source foods<br>(ASF; e.g., poultry, fish and other aquatic<br>foods, dairy products, etc.), causing gaps in<br>regulatory coverage. |
| It mandates the Ministry of Agriculture inspect<br>the processing of meat and meat products,<br>carcasses, and animal by-products.   | It has an overlapping mandate with EFDA, particularly on processed meats.   |
| It prohibits the sale or disposal of livestock,<br>carcass, meat, animal by-products, and meat<br>products if the inspection determines they are<br>unfit for human consumption. | Its focus on meat inspection reflects export<br>markets, neglecting products supplied to<br>local markets for domestic consumption.   |

### CONSIDERATIONS

The regulation could be broadened to accommodate ASFs beyond livestock, with specific implementation directives drafted accordingly.

The legal basis for the regulation could be clarified to increase synergies, rather than duplicating efforts, based on the authorities and responsibilities of each governing body.

| Table 5. Evaluation of Plant Quarantine Proclam   | ation as Relevant to Food Safety '*  |
|---|--|
| STRENGTHS   | LIMITATIONS  |
| It provides the legal basis to quarantine all<br>imported plants and other products potentially<br>infested or infected with plant pests. | Its sole focus is the protection of plants to<br>prevent contagious plant diseases from<br>entering the country. It does not cover food<br>safety hazards that may have originated<br>from plant origin foods. |
| It applies a restriction on imports of products<br>that may be the potential source of plant<br>disease unless issued an import permit.   | It is outdated – nearly 30 years old – and<br>does not fit current realities and contexts.<br>It neglects about food safety, with a scope<br>limited only to plant health.                                     |

Table 5. Evaluation of Plant Quarantine Proclamation as Relevant to Food Safety <sup>14</sup>

#### **CONSIDERATIONS**

The regulation could be updated to cover all safety issues from foods of plant origin.

The updated regulation could consider informal sectors (i.e., traditional markets), as they play a pivotal role in distributing foods of plant origin in local communities.

| <b>Table 6.</b> Evaluation of Veterinary Drug and Feed Administration and Control Proclamation as |
|---|
| Relevant to Food Safety <sup>15</sup>   |

| LIMITATIONS  |
|--|
| It is not applicable to ASFs, which pose the greatest potential food safety hazards.   |
| It only applies to commercially produced veterinary drugs and animal feeds (i.e., produced or processed materials).  |
| It only applies to products crossing the<br>borders of more than one region in the<br>country (i.e., "transregional products").<br>It focuses only on animal health while<br>neglecting human health concerns. |
|  |

#### CONSIDERATIONS

The regulation could be updated to reflect evolving global trade, eliminating the limitation posed by transregional product categorization.

The regulation could be updated to cover all animal feed types, not only those prepared for commercial purposes.

The final products of feed and veterinary drugs (i.e., animal foods for human consumption) could be prioritized, as foods safety concerns may stem from these food product components.

### 4.3. LACK OF CONSUMER ASSOCATIONS

Ethiopia lacks laws and regulations that require the three governing bodies to educate the public on food safety hazards and their consequences, representing a gap in the current legal framework. Public awareness via consumer associations can be powerful instruments to positively impact food safety. The lack of Ethiopian consumer associations on food safety in marketplaces obscures consumer concerns about the safety of food. Increasing public awareness can be a duty of the government, empowering the public to better protect itself.

## 5. FOOD SAFETY MANDATES OF REGIONAL AUTHORITIES

The next two sections provide an overview of relevant policies from Addis Ababa and the newly established Sidama Regional State.

## 5.1. ADDIS ABABA CITY

Relevant food safety activities in the Addis Ababa City Government are described in the city government policy Proclamation No.64/2019.<sup>16</sup> In addition, Proclamation No. 30/2012<sup>17</sup> ratified the establishment of Addis Ababa City Government Food, Medicine and Health Care Administration and Control Authority (FMHACA). **Table 7** describes the duties and powers delegated to four city government bodies, while **Table 8** provides an analysis of the FMHACA regulatory responsibilities.

#### Table 7. Food Safety Duties and Powers of Addis Ababa Governing Bodies

## FOOD, MEDICINE AND HEALTH CARE ADMINISTRATION AND CONTORL AUTHORITY (FMHACA)

- ensure the safety and quality of foods; the safety, potency, quality and appropriate prescription of medicines; the competency and practice of medical personnel and the fulfillment of inspection standards of institutions that carry out hygiene, environmental health and health related controls;
- issue professional license for health-related institutions; follow up and control their fulfillment of hygiene and health standards;
- ensure the proper disposal of expired foods, medicines and raw materials in institutions in which inspection is being carried out by the authority;
- control illegal foods, medicines and health services; take the necessary measure;
- organize quality inspection laboratories which are necessary for the work; collect payments, as per the law, for the services it renders.

#### TRADE AND INDUSTRY DEVELOPMENT BUREAU

 design, promote and encourage suitable trade and industry projects that are in accordance with the national trade and industry policy and laws as well as considering the prevailing situations of the city; create favorable conditions for the expansion of trade, industry and handicraft in the city;

- encourage local investors to widely participate in the trade and industry activities of the city; give technical and counseling services; issue and control trade license for local investors who are involved in the trade and want to establish medium size industries;
- develop and set standards for market centers; control for the construction of standardized market centers; design strategies for the expansion and development;
- follow up and control that the distribution of basic commodities and services in the City are in accordance with the trade laws and the market system;
- control and ensure that the products and services supplied to the market are of good quality and up to the standard; as well as cause for the disposal of products that are below the standards and expired in collaboration with the concerned organs;
- ensure packaging has clear marking of the expiration period and chemical composition of utility goods in a way that the consumer could easily notice;
- establish a procedure to channel informal trade to the formal system; follow up the implementation of same;
- prevent and control illegal trade in collaboration with the concerned organ; take or cause the taking of measures.

#### ENVIRONMENTAL PROTECTION AND GREEN DEVELOPMENT COMMISSION

- follow up and control the disposal of residuals, by-products and wastes generated from industries and other service rendering institutions as per the law; take or cause the taking of measures in accordance with the law;
- prepare environmental protection standards; design strategies to protect the environment from pollution; coordinate stakeholders with regard to environmental protection;
- issues a certificate of competence for pollution prevention, in accordance with the environmental protection laws, for manufacturing service rendering institutions and other institutions that have an influence on the environment.

#### FARMERS AND URBAN AGRICULTURE DEVELOPMENT COMMISSION

- design strategies for the production and supply of quality agricultural products as well as enhancement of agricultural development;
- study the prevalence of animal diseases; notify measures to be taken due to the spread
  of diseases for the government and animal breeders; provide or cause the provision of
  animals' medication and vaccination service for breeders; give vaccination for rabies; get
  rid of dogs that have no owners;
- give quarantine control service on animals and plants; ensure that the quality of veterinary medicines used in the city are up to the standard and not expired; get rid of expired medicines;
- call for the preparation of designated areas for market centers for animals, crops, vegetables, and fruits and for urban agriculture on the structural plan; and the construction of same in a modern way;
- without prejudice to the provisions stated in the other laws, control the meat inspection service of governmental, association and private abattoirs; ensure the supply of healthy meat for the customer; control illegal slaughtering and illegally slaughtered meat trafficking; undertake product quality and hygiene control on meat processing factories.

**Table 8.** Evaluation of Addis Ababa Addis Ababa Food, Medicine and Health Care

 Administration and Control Authority (FMHACA) Relevant to Food Safety <sup>18</sup>

| STRENGTHS  | LIMITATIONS   |
|--|---|
| It established the Addis Ababa FMHACA with the   | Informal markets are not regulated by the   |
| aim of protecting public health in Addis Ababa<br>City by ensuring food safety and quality.  | FMHACA; therefore, it treats informal market activities as illegal trade.         |
| It strengthens procedures for health professionals<br>and fulfills environmental health standards for<br>health and health-related institutions. | It regulates food establishments, with less emphasis on regulating food products. |

#### **CONSIDERATIONS**

The regulation could be updated to reflect local contexts and realign with recent federal Proclamation revisions.

The regulation could be revised to adopt risk-based product regulations.

With growing urbanization, the regulation could be updated to reflect increasing food safety hazards for city food vendors (i.e., street vended foods and mass catering establishments including school feeding programs in cities around the country).

Rather than classifying the informal sectors as "illegal trade," regulations for food safety in traditional markets could be designed with specialized functions fit for context. Legislation could be broadened to provide governing bodies the authority to develop appropriate regulations and compliance measures.

### 5.2. SIDAMA REGIONAL STATE

The Sidama Regional State was established on June 18, 2020 from the Southern Nation, Nationality and People's Regions (SNNPR) Regional State. The Sidama Regional State adopted the SNNPR's previous regulatory framework (Proclamation 3/1995),<sup>19</sup> delegating regulatory powers on food safety activities – the Bureaus of Agriculture, Health and Trade, Industry and Tourism. The Proclamation contains only three explicit references to food safety, including:

- Increasing the quality of agricultural exports but neglecting foods traded and consumed domestically;
- Establishing inspection centers to control the flow of illegal transactions, neglecting food safety and quality; and
- Ensuring quarantine control of imported plants, seeds, animal, and animal products.

Those limited authorities do not adequately cover food safety in Sidama Regional State.

## 6. KEY INFORMANT INTERVIEWS SITUATION ANALYSIS

Food safety system implementation in Ethiopia has multiple stakeholders. The stakeholders selected for the key informative interview has extensive practical experience and knowledge that can help to understand the strength and weakness of the system which will enable to make a recommendation to strengthen or improve the food safety implementation. **Table 9** describes the results of 13 key informant interviews. EatSafe divided the food safety policy context into four quadrants: strength, weakness, threats and opportunities.

| Key mornant merviews   |   |
|--|---|
| ENABLING ENVIRONMENT   | DISABLING ENVIRONMENT   |
| STRENGTHS  | WEAKNESS  |
| Current structures, policies, and regulations<br>and regulatory bodies have trusted reputations<br>in markets around the country                         | Existing laws are outdated (i.e., some laws reflect final<br>product inspection, rather than preventive approach of<br>managing risks throughout value chain)   |
| The regulatory system performs well at protecting the public from unsafe food sources  | Parts of food value chains are not covered by existing<br>enforcement bodies (i.e., lack of complete coverage)  |
| Some sectors have detailed guidelines (e.g.,<br>animal slaughtering sector) that provides a<br>structure focused on preventive methods                   | Lack of demarcated lines of responsibilities for food<br>control activities (i.e., several federal-level regulatory<br>bodies have overlapping mandates)  |
| Some sectors have adequate safety infrastructure (e.g., animal vaccination facilities)   | Lack of regulation enforcement due to shortage of trained personnel and inadequate training facilities  |
|  | Lack of regulation enforcement due to limited public literacy and knowledge of food safety  |
|  | Lack of adequate facilities/modalities to train vendors<br>and others food handlers in GHP, GMP, or HACCP<br>before providing license to engage in food handling<br>business (see <b>Section 5.1</b> below) |
| OPPORTUNITY  | THREATS   |
| The government is motivated to implement<br>technical recommendations that have positive<br>impacts on the general wellbeing of the public               | Without proper regulation, population growth and urbanization can increase food contamination risks   |
| Many governmental and nongovernmental<br>organizations are engaged with food safety<br>policy, and standards to ensure the safety of<br>foods in markets | Recent increases in unlicensed informal city food<br>markets, street food vendors, and small food<br>preparation establishments near factories that lack<br>food safety training                            |
|  | Lack of public awareness exacerbates existing weaknesses in the system  |
|  | Increasing food prices may incentivize food handlers/<br>vendors to adulterate food (e.g., add inexpensive or<br>unsafe materials) which may pose food safety hazards                                       |

**Table 9.** Analysis of Enabling and Disabling Environment Factors Relevant to Food Safety from Key Informant Interviews

### 6.1. LACK OF FOOD SAFETY MANAGEMENT BEST PRACTICES ADHERENCE

Several key informants noted the lack of regulation, training, and implementation of Good Hygienic and Manufacturing Practices (GHPs and GMPs, respectively) and Hazard Analysis Critical Control Point (HACCP) systems across many of Ethiopia's food value chains. For example, while many Ethiopia-based food industry groups with export businesses have successfully implemented GHP, GMP, HACCP systems and other, internationally-recognized food safety certifications,<sup>b</sup> most food handlers and vendors in hospitality, catering, supermarkets, trading, distributing, and traditional market contexts lack knowledge and training on these effective food risk management and control systems.<sup>20</sup> Furthermore, relevant food safety issues in Ethiopia's food processing sector that could be resolved with proper implementation of GHP, GMP, and HACCP include: limited record keeping and documentation practices; poor packaging and labeling; and food handling by untrained technicians. In lieu of regulatory action on these best practices, intensive, targeted training packages coordinated by relevant associations and regulatory bodies, development partners, and donor organizations could provide this critical support to improving the safety of Ethiopia's food supply.

## 7. CONCLUSIONS AND CONSIDERATIONS

EatSafe conducted this review of existing food safety policies in Ethiopia to understand existing regulatory frameworks for food safety systems at the national, regional, and local levels. Several key findings emerged:

An enabling regulatory environment exists for ensuring the safety of food in Ethiopia, but effective coordination mechanisms must be developed to clarify authorities between governing bodies. Though Ethiopia's landmark 2018 Food and Nutrition Policy briefly addresses food safety, the detailed regulations and standards that govern food safety systems are outdated and fragmented across several governing bodies. Several ministries and independent executive bodies share the responsibility to manage food safety. Multi-agency system governance requires a strong coordination mechanism to avoid duplication of effort and addressing the food safety related issue effectively. Ensuring the safety of food is a shared responsibility that requires strong synergy with clear lines of authority and accountability.

<sup>&</sup>lt;sup>b</sup> An additional certification of note is "GLOBAL GAP," which is the European Retailers Standard for Good Agricultural Practices (GAP). It "encourages the adoption of commercially viable farm assurance schemes that promote sustainable agriculture and the minimization of agrochemical inputs."

Most of the Proclamations related to food safety focus on the *formal* food sector, overlooking the specific needs of traditional market vendors and other small food industry groups. The informal market is specifically defined as "illegal." This gap in coverage underlines the need to adapt national food safety policy and legislation at a regional level that have more direct responsibilities for local market operations.

The level of food safety knowledge within and around traditional food market settings is poor. There is limited capacity to train i) inspectors in effective enforcement of existing regulations and ii) food vendors and handlers in GHP, GMP, and HACCP procedures – requiring capacity building programs for both public sector employees and private operations. EatSafe should thus consider the need for intensive food safety awareness among informal food safety actors.

Lastly, private sector involvement in food safety activities is limited. At present, no recognized consumer association advocates for food safety policies or enforcement. In collaboration with key stakeholders, EatSafe can contribute towards the introduction of consumer associations that focus on the safety of food and its importance for public health. EatSafe could identify and collaborate with leading public and private sector stakeholders for successful implementation and lasting impact.

## 7.1. CONSIDERATIONS

The following considerations aim to further improve Ethiopia's food safety system.

**Strengthen the national and regional structures that coordinate food safety system components,** harmonizing and simplifying disparate policies, laws, standards, and regulations: The government could comprehensively review existing and outdated food laws and regulations, with the aim of demarcating clear responsibilities and authorities for governing bodies at the federal, regional, and local levels. At the federal level, effort duplication could be eliminated by streamlining regulations and instituting Memorandums of Understanding (MoUs) between the Ministries of Health and the EFDA, as well as the Ministries of Agriculture, Trade and Industry.

Develop capacities for implementation of food safety activities along the food value chain (i.e., provide intensive training on GHP, GMP, and HACCP to food value chain actors in both the public and private sectors). The government could devise, distribute, and review compliance with GHPs and GMPs for food establishments, including recommendations on how to conduct food safety risk assessments. Enforcement and compliance activities could be supported by improvements in public facilities, equipment, and EFDA personnel. Further, qualified food safety personnel with expertise in food safety best practices could be hired for leadership positions (i.e., at the Directorate and Department levels) in federal Ministries. In the private sector, vendor

associations could be made more aware of the importance of food safety, potentially by developing self-regulatory mechanisms through which they can develop and then monitor compliance to food safety standards.

**Utilize university-level expertise:** Ethiopia's colleges and universities are an underutilized resource, as they have the research expertise, laboratories, and analytical services that could support food hazard risk assessments and other food control activities. Regional regulatory bodies and/or private industry groups could establish MoUs with universities for this technical support.

#### **Recommendations for Intervention Design and Future Studies under EatSafe**

EatSafe in Ethiopia aims to generate evidence and knowledge to increase consumer demand for safe, nutritious foods in traditional market settings. Central to EatSafe's work is understanding the motivations, attitudes, beliefs, and practices of consumers and food vendors. Relevant findings from this review important to intervention design include:

- In the absence of food safety regulations for traditional markets in Ethiopia, EatSafe could consider interventions that increase consumer and vendor awareness on the importance of food safety.
- Given that the authority for food safety in Ethiopia is dispersed throughout many national, regional, and local bodies, EatSafe should engage many stakeholders during intervention design and testing to ensure effective implementation and support.
- Because many food value chain actors lack training on food safety best practices (e.g., GMP, GHP, and HACCP), EatSafe could consider educational materials or other capacity building activities to enhance food safety knowledge among regulators and vendors in traditional markets.
- Though no consumer association supporting food safety exists in Ethiopia, they are effective channels to advocate and advance for food safety policies and behaviors.

## 8. APPENDICES

## 8.1. APPENDIX 1: LIST OF KEY INFORMANT INTERVIEWEES

| STAKEHOLDER NAME         | TITLE   | ORGANIZATION   |  |
|--------------------------|---|--|--|
| Hiwot Tadesse            | Assistant Director of Food<br>Inspection Directorate              | Ethiopian Food and Drug<br>Authority   |  |
| Gebrekidan Asresahegn    | Plant Health and Product<br>Quality Directorate Director          | Ministry of Agriculture  |  |
| Sisay Getachew           | Director, Veterinary Public<br>Health Directorate                 |  |  |
| Tariku Teka Woldegiorgis | Deputy Director General   | Ethiopian Meat and Dairy<br>industry Development Institute                           |  |
| Dr. Solomon Kebede       | Director For Veterinary Drug and Animal Feed                      | Veterinary Drug and Feed<br>Administration and Control<br>Authority                  |  |
| Sefalem Aberorday        | Inspection and Regulatory<br>Trade Director                       | Addis Ababa Trade Office   |  |
| Million Kassa            | Trade Licences Directorate  |  |  |
| Miresa Mideksa Ayano     | Inspection Directorate<br>Director for Food and<br>Related Sector | Addis Ababa Food Medicine<br>and Health Care Administration<br>and Control Authority |  |
| Teshom Wogaso            | Officer   | Sidama Region Health Bureau  |  |
| Heberabe Abera           | Quality Inspector   | Ethiopian Conformity<br>Assessment Enterprise,<br>Hawassa Branch                     |  |
| Kebed Bekele             | Health and Health Related<br>Inspection Team Coordinator          | Ministry of Health   |  |
| Getinet F/silassie       | Food Safety and<br>Microbiology Team Leader                       | Ethiopian Public Health Institute  |  |
| Mengstu Tefera           | Standard Implementation<br>Director                               | Standard Agency  |  |

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<sup>3</sup> Ibid. FAO/WHO, 2003.

<sup>4</sup> Roesel, K. and Grace, D. (2014). Food safety and informal markets: Animal products in sub-Saharan Africa. London, UK: Routledge. <u>Available online</u>

<sup>5</sup> FAO/WHO (2003). See Footnote #2.

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<sup>12</sup> Ethiopia (2019). See Footnote #10.

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<sup>18</sup> Ibid., Addis Ababa City Government, 2012.

<sup>19</sup> SNNPR (1995). Definition of Powers and Duties of the Executive Organs of the Southern, Nations, Nationalities and People's Regional State. Proclamation No. 3/1995.

<sup>20</sup> Ayalew et al., (2013). See footnote #7.