



# Risk-based Food Import Control: Coordination and Data Sharing Among Regulatory Agencies

4 November 2024



# Food Import in Bangladesh

Bangladesh **3<sup>rd</sup>** Largest  
Food Importer in the  
World

Imported food worth **\$12.5**  
mn in 2021

Import dependence rose from **9.3%** in  
2010 to **11.2%** in 2022

Around **1,11,950** consignments  
imported under HS Chapter 1-24-  
Majority is food



Do we have any  
comprehensive modern  
system to manage such huge  
food import?



# The Problem



# The Problem

## **No Single agency to manage food safety of 17mn consumers**

- Agencies examine and test products with different objectives

## **Manual import procedure**

- From B/E submission, inspection, testing to report transfer all are done manually

## **Test parameters for declaring Fit for Human Consumption is defined**

## **No risk-based import system**

- 100% consignments being tested
- All products, importers and suppliers are treated the same way

## **No comprehensive Food Safety Monitoring System**

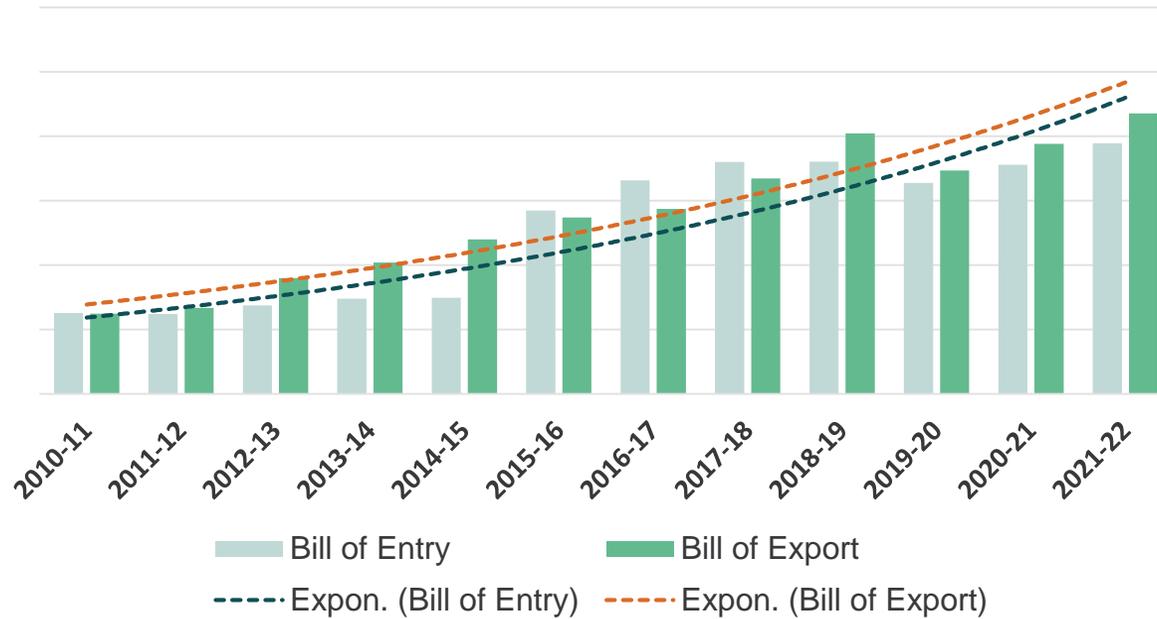
- No modern approach to monitor imported food quality and safety

## **Some food products not controlled by any regulatory agency**

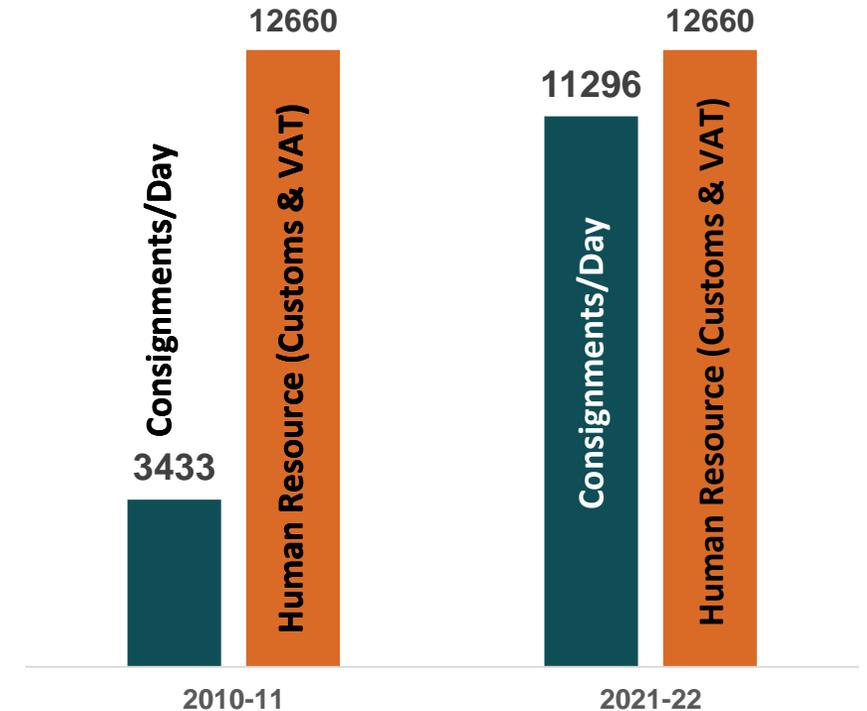
- Customs manages the import procedure as per IPO

# Why is Risk-based Electronic System?

## Bills of Entry & Export



## Capacity vs. Trade



Trade is expanding but resources are not;

- Logistic limitation,
- Human-resource limitation

One size does not fit all

Being used by both developed and developing countries as part of Customs modernization

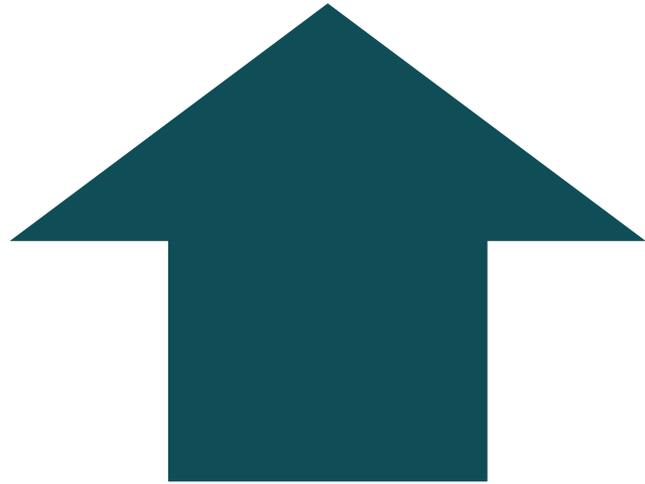
Important for perishable products to retain quality and reduce decay



# The Proposed Solution



# The Solution



## **Legislative Foundation**

- Electronic Governance of Safe Food (Import) Regulations



## **Implementation System**

- National Food Import Information Management System

# Features and Implementation Tools

## Unique Features

### Coordinated Modern Food Import Control System

- Structured coordination with other agencies
- Ensures safety of consumers
- Facilitates traders by removing unjustified technical barriers
- Based on international standards

### Completely based on electronic implementation

- First of its kind system
- Title sets the tone
- No additional step in the clearance process
- Import process harmonized and simplified
- Workflow automation to facilitate traders

### National Food Risk Data hub

- All food safety risk data under one platform

### Food Safety Management System

- Quality and food safety monitoring of all imported foods
- Risk and compliance analysis



Pre-Border Notification



Pre-arrival Notification



Risk Assessment based on documentary check



Advise/recommendation for risk-based release

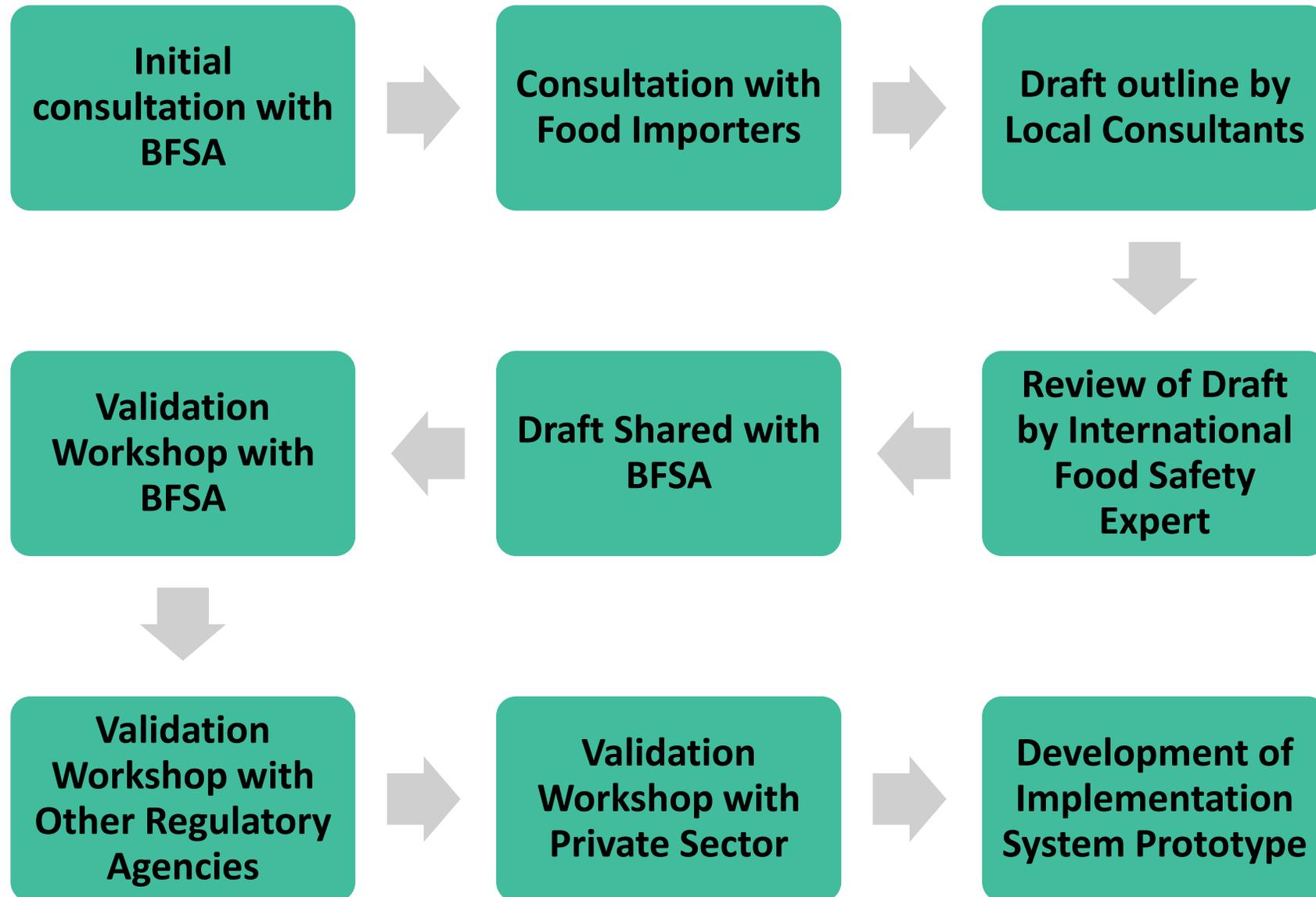


Post Import Monitoring

# Best Practice from Different Countries

Country	Risk-based Clearance Provisions for Processed Food
<b>India</b>	<p><b>For low-risk products:</b> If 5 consecutive consignments of the same product imported by the same importer are compliant, then only 5% of consignments are inspected and tested on a random basis.</p> <p><b>For high-risk products:</b> If 5 consecutive consignments of the same product imported by the same importer are compliant, 25% of the next 20 consignments and only 5% of all subsequent consignments are inspected and tested.</p>
<b>Vietnam</b>	<ul style="list-style-type: none"><li>• Based on the product's country of origin and certification, and risk analysis, 3 types of inspection and testing systems are prevalent (reduced, normal and tough)</li><li>• <b>Reduced Inspection:</b> Document examination for 5% consignments</li><li>• <b>Normal Inspection:</b> Document examination only</li><li>• <b>Tightened Inspection:</b> Document examination, sampling, and (If 3 consecutive consignments are compliant then tightened inspection goes back to normal inspection)</li></ul>
<b>Cambodia</b>	<ul style="list-style-type: none"><li>• <b>For low-risk products:</b> 5% inspection</li><li>• <b>For medium-risk:</b> 25% of first 5 consignments and 5% on all subsequent consignments</li><li>• <b>For high-risk cases:</b> 100% for first 5, 25% for next 20 and 5% for all subsequent consignments (non-compliance at any stage may change this)</li></ul>
<b>Australia &amp; New Zealand</b>	<ul style="list-style-type: none"><li>• 100% inspection for first 5 consignments</li><li>• 25% inspections for the next 20 consignments</li><li>• 5% for all subsequent cases</li><li>• (In case of non-compliance at any stage, 100% inspection for 5 consignments again)</li></ul>

# Journey so far to Modernize the Approach



# Risk Management for Imported Food

Risk Management is a system to clear and release goods by determining risk levels and identifying shipments with high risk that would require physical inspection and in some cases lab test and shipments with low risk that can be released without physical inspection.

- High Risk
- Mandatory Inspection/Testing
- Higher allocation of resources
- Moderate Risk
- Documentary evidence checked
- Inspection/Testing if needed
- Comparatively lower
- Low Risk
- No Inspection/Testing
- Low allocation of resources
- Expedited Release

- No 100% testing if not risky
- Reduces time and cost of trade
- Enhances competitiveness
- Efficient allocation of resources
- Ensures balance between control and facilitation
- Use of Risk Indicators, Criteria and Profiles
- Privileges to compliant traders

# Bangladesh's Obligations & Commitments



As obligated under WTO Trade Facilitation Agreement, Bangladesh has committed to implement Risk Management by **30 June 2026 (under Category C)**

- Article 7.4 of WTO Trade Facilitation Agreement
- Article 5 of WTO SPS Agreement
- Article 2 of WTO TBT Agreement
- Chapter 6 of Revised Kyoto Convention (RKC)

# Agencies' Engagement in Risk-based Clearance

## Bangladesh Customs

Practicing risk management since 1980s

Now uses ASYCUDA selectivity module

Very low inspection rate– less than 10% in Chattogram custom House

Customs Risk Management Commissionerate established

## Other Agro-trade Agencies

PQW, DoF, DLS, BSTI established dedicated risk management unit

Risk profiles for each agency developed

Comprehensive training program organized

Awaiting structured implementation of risk-based clearance

**BFSA will work closely with the Risk Management Units of the respective agencies, and will support their activities regarding food-safety risk**

# Why BFSA in the Advisory Role?

Mandated to provide advisory and supportive role to the Government and other regulatory agencies on maintaining and upgrading laws relevant to food safety

Established to work as the coordinating body in food safety-related matters

## **The Food Safety Act, 2013**

**13. Duties and functions of the Authority.**—(1) The main duties and functions of the Authority shall be to regulate and monitor the activities related to manufacture, import, processing, storage, distribution and sale of food so as to ensure access to safe food through exercise of appropriate scientific methods, and to coordinate the activities of all the organizations concerned with food safety management.

# The Complementary Role with Agencies

## Other Agencies

- Agencies governed by own legislations related to quarantine, quality control, etc.
- Inspection and assessment based on focusing mostly on sanitary and phytosanitary issues with some food safety parameters as needed
- Provide certification for release of imported and exportable goods

## BFSA

- BFSA has separate standards, limits and compliance based on Codex and other international standards
- Risk assessment will focus only on food safety parameters – chemical contaminants, toxins, additives, harmful residues, packaging etc.
- No physical inspection and sampling of products under jurisdiction of other agencies
- No Certificate/NOC by BFSA– only recommendation

**BFSA will not step into the role of any other regulatory agency**

**In products where no other agency is involved, BFSA will support risk-based release**

# Major Risk Parameters from Agency Perspective

## Fisheries

- Fish health
- Transboundary fish diseases
- Pathogens
- Biosecurity and biodiversity
- zoonotic diseases
- Antibiotics
- Anti-bacterial and chemical substances
- Veterinary drug use and residue
- Medicinal use for disease treatment, etc.

## Plant

- Quarantine Pests
- Non-quarantine pests
- Regulated pests
- Infestation and contamination
- Bio-security and
- Other phytosanitary-related issues.

## Livestock

- Transboundary Animal Diseases
- Presence of pathogens
- Veterinary drug
- Parasitic contamination
- Chemical contamination
- WOAHA listed zoonotic/microbial contaminants
- AMR Bacteria
- Fungal contaminants, etc.

**Other contaminants, heavy metal, residues based on product category and end use.**

# Need for Coordination with Regulatory Agencies

All food products are originated from plant, fish or animal

To prevent duplications and overlaps  
in roles

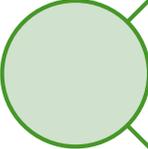
To maximize efficiency and minimize  
disruption

To provide for effective and efficient  
controls facilitating trade and  
businesses

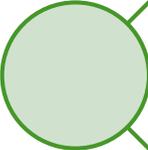
To minimize regulatory burden and  
additional costs

To establish structured mechanism for  
information sharing

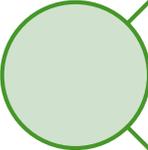
# Data to be shared with Agencies by BFSA



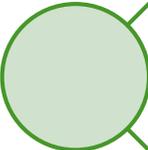
List and profiles of compliant and non-compliant importers



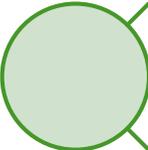
Risk profiles of food items from food safety perspective



Exporting country profiles and categorization based on their standard regulations



Any alert/notification/risk in any exporting country/manufacturer/supplier



Value and volume of imported food products and their destinations

# Engagement Scopes and Modality with Other Regulatory Agencies

Other agencies will be integral part of Food Import Management System

Agencies will have access to data under the system

Separate dashboard for individual agency based on their needs and priorities

Access to pre-arrival notification data

Notification system for agencies on BFSA's risk assessment and categorization

# How agencies will be benefited

Use data and evidence to categorize compliant traders/suppliers to facilitate the process for them

Scientific evidence will make decision making easy for agencies

Comprehensive idea on products being imported

Pre notification to support preparation of agencies before goods arrive

Contribution to overall food safety of the country

# Benefits to Business

**Impact on Businesses,  
Consumers**



**Risk-based import clearance process to significantly reduce cost and time of trade**



**Entire automated system to simplify overall food import procedure**



**Compliant traders to enjoy green channel facilities**



**Same product, same importer, same supplier– with compliance record to get benefit**



**Transparency and accountability to be enhanced**



**Competitive pricing in the market**

# Ultimate Vision

**Making Food Import System simplified and systematic addressing all food safety concerns and making quality food available at a **competitive price****



Thank You