Part 4: General Quality Assurance at Ports and Borders

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The inspection of food at border or Ports is part of the responsibilities of the Government of Liberia to ensure that foods entering the border are compliant with the technical regulations of the national food fortification program. This is to make sure that specified foods are not imported and distributed to consumers if they are not fortified appropriately. The process involves collecting food samples and reviewing documentation and declarations on food labels. This is achieved by reviewing the Certificate of Conformity or Analysis (COA) accompanying imported food batches as well as collecting samples at ports of entry and testing them qualitatively on site.

The purpose of this manual is to provide Custom Officers of the MoF and Environmental Health Officers of MoHSW with a simple tool for assessing the extent to which importers of fortified foods comply with local regulations related to food fortification.

Composite samples of selected brands are prepared quarterly and sent out for quantitative tests to the National Standards Laboratory to confirm information of the COA. The purpose of the quantitative tests is to review and validate the decision taken at the importation site based on qualitative tests. If anomalies are identified through the quantitative testing, the results provide a basis for alerting border officials on which failing brands need more scrutiny.

The procedures described in this manual are applicable for the following foods:

- Oil
- Sugar
- Salt
- Wheat flour

These procedures are divided in two categories, namely:
1. Objectives and Responsibilities
The purpose for assessing the minimum requirements prior to authorizing entry is:

i. To ensure that the imported products are accompanied by adequate documentation to certify that national standards and regulations are being fulfilled.

ii. To confirm that the food complies with fortification conditions based on the presence of one or more key micronutrients in the imported fortified food.

Officials from the customs officers in conjunction with the responsible government institution in charge of certifying the quality of foods (e.g. Ministry of Commerce and Industry and Ministry of Health and Social Welfare) should perform the task of collecting samples, testing them qualitatively and reviewing documentation before the food can be allowed to enter the country.

2. Procedure

Reviewing the Certificate of Conformity or Certificate of Analysis and Labeling
The team of inspectors will perform the following duties:

- Review the documents that usually certify the safety (and sometimes quality) of the imported product.
  - Examine the Certificate of Conformity or Analysis, issued by an officially recognized body from the country of origin, which would declare –supported by laboratory analysis- that the food fulfills the regulations established in the importer country.
- Examine the packaging and the labeling to make sure that it indicates the brand name, batch number, country of original and manufacturer. The food must comply with the Food Labeling Standards, as well as the labeling requirements established in the regulations for fortified foods such as micronutrient levels. Inspectors should also look out for false health claims that may be contrary to set guidelines in the country. They should record data in the Inspection Form (Table 1).
- Additionally, the food labeling should include the ENRICHED fortification logo.

Confirming the presence of indicator micronutrients

- From each batch or truck containing the same brand names, randomly collect 3 samples (500 grams or 100 milliliters per sample) of imported fortified food. Collect samples based on brand names and perform appropriate qualitative tests corresponding to the food using methods. Record results in Inspection Table 1.
- At least once a quarter, the samples are then put into one composite sample and sent to the NSL.
- All samples should test positive for the indicator micronutrient.
- If importer disagrees with the results, collect 3 new samples and perform the test again.

**Taking decisions to authorize**
- If samples fail the qualitative test or fail to comply in terms of proper documentation or labeling requirements, the affected brand should not be allowed to enter the country.
- If documentation is correct, and samples show the presence of the key micronutrient, authorize importation and proceed with the preparation of a composite sample as described below.

**Preparation of quarterly composite samples for quantitative testing**
- Take three samples of 500 g (or 100 mL) from each brand and truck (or consignment) that has been accepted and place in a 5,000 g (or 1,000 mL) container labeled with the name of the brand imported into the country. Write the date of sampling on the container. Keep well closed, in a dark, dry and cool place.
- Positive samples of the same brand that arrive in subsequent consignments are to be combined by adding them to the appropriate container for that brand. Do not forget to write the corresponding date of each and every consignment added to the composite sample. Once the container is full (3 consignments), close and store it. Use new containers for additional samples and always keep samples in a dark, dry and cool place.
- Every three months, inspectors will collect and immediately send the composite samples collected to the National Standards Laboratory through the Director of Standards Division MoCI. The samples must arrive at the NSL within 24 hours.
- Samples will be protected from exposure to heat, humidity and light: Flour, sugar, and salt are to be placed in the zip lock bags, which will then be placed inside the black bags and quickly put into the cooler. The oil samples must be placed in the sampling bottles and also put into the cooler to protect them. The samples should be well packaged and make sure that they are well labeled.

**Actions for brands whose composite samples fail quantitative tests**
- In the case where the laboratory reports of brands containing below minimum levels of the indicator micronutrient, inspectors at the border will be notified immediately and the brand name put on its Black List for closer scrutiny of subsequent consignments. A letter will be sent by the National Standards Laboratory to importer(s) advising them of the new status of their brand. This warning letter will state that any shipments arriving after the issuing of the letter will be sampled for immediate quantitative analysis, over and above normal sampling for qualitative tests and document review, and the importer will cover the cost of this quantitative analysis.
- In the next shipment of a brand in the Black List, the inspector at the border goes through the general sample taking procedure again. However, despite that it passes the examination, authorization for entering the country depends on results of the following steps:
o The Inspector will randomly collect nine 500-g (or 100-mL) single samples per truck, and prepare 3 composite samples, mixing 3 of the single samples for each one of them, and send them to the laboratory with the instruction that the analysis should be done urgently and report submitted to the Office of importation. Importer should cover the cost of shipment and analysis.

• If a brand on the Black List passes the quantitative test, it shall be allowed entry and removed from the Black List at the border.

3. Records and Reporting
In all cases, the Border/Port inspector will duly complete inspection form (Table 1) relating to import inspection and forward samples for testing through the Director of Standards, Ministry of Commerce and Industry. Results of qualitative analysis will be kept by the NFA Secretariat. A quarterly summary report will be submitted by the NSL to the NFA Steering committee. The report will contain the dates, brands, amounts, and actions taken.
Table-1
NATIONAL FOOD FORTIFICATION ALLIANCE: IMPORT INSPECTION / SAMPLING FORM

<table>
<thead>
<tr>
<th>DATE: _______________</th>
<th>BORDER/PORT CODE: _______________</th>
<th>DISTRICT: ____________</th>
<th>COUNTY: _______________</th>
</tr>
</thead>
</table>

**Inspector Name:**

**Supplier Address:**

**Batch No. and Size:**

**Product:**

**Brand:**

**Country of Origin:**

**Certificate of Conformity:**

**Shipping Record ID:**

**Importer (Name and Address):**

**Brand Name of Inspected Commodity:**

**Product Examination: LABELING INFORMATION**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brand Name</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manufacturer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Expiry Date</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Batch Number</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Types and levels of added micronutrients</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Presence of nutrient</td>
<td>Based on qualitative test of three composite samples per brand and per truck (consignment)</td>
<td></td>
</tr>
<tr>
<td>ENRICHED Logo</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Country of Origin</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Amount imported</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Required Action:**

**Signature:**

Mark with a tick ( ) in the adequate or inadequate boxes where appropriate