



# Food Fortification Initiative

Enhancing Grains for Healthier Lives

## Import Monitoring

This module is for people responsible for monitoring imported wheat flour, maize flour, and rice. The document describes how countries should monitor levels of fortification – adopted voluntarily or imposed by regulation.

Countries should always monitor imports regardless of volume, but country capacity/ability may determine how in-depth monitoring goes. At the very least, each country should have a policy or protocol for how imported products are checked at border points for safety and quality. This policy or protocol should include:

- How and when to inspect imported foods for pests and food pathogens to ensure compliance with national standards, including food fortification standards
- What agency is responsible for inspecting imports
- What audit or testing methods should be used on the imported products
- How and when samples should be taken based on the applicable food laws and standards and on the resources available in the country
- What to do when non-compliance with national standards is found

## Why regulate imported food?

Monitoring the safety and quality of imports allows countries to ensure basic food safety and that consumers receive the health benefits of fortification. Additionally, it creates a fair market for the industry by ensuring equitable fortification costs for domestic producers as well as importers.

Monitoring imports verifies whether the products are compliant with national standards and provides a basis for issuing specific quality improvement recommendations to importers. Lastly, import monitoring warns officials at importation sites of failing brands that deserve more stringent examination.

## Who is responsible for import monitoring?

Import monitoring is the job of those who work at customs to inspect imported foods. The responsibility of fortification monitoring should be integrated into existing inspection positions instead of creating new positions. In many countries, multiple agencies may be responsible for monitoring food products at points of entry. Roles and responsibilities should be clearly outlined, documented, and communicated to avoid duplication of efforts and to ensure clarity on who is ultimately responsible for follow-up and enforcement.

For example, the following responsibilities may be assigned to different positions:

Agency/Position	Responsibilities
<b>Officials from Customs, Ministry of Agriculture (Quarantine), and/or Ministry of Health</b>	<ul style="list-style-type: none"><li>• Flag the fortified food as a “food of regulatory interest” to the food inspector at the point of entry</li><li>• Review documentation before the food can be allowed to enter the country</li></ul>



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<b>Import Inspector</b>	<ul style="list-style-type: none"><li>● Review consignment documents to validate the identity (and sometimes safety and quality) of the imported product</li><li>● Examine the Certificate of Conformity and/or Analysis, issued by a government authority or an officially recognized body from the country of origin, to confirm the food complies with fortification requirements</li><li>● Examine the packaging to make sure it complies with labelling requirements (eg. brand name, batch number, country of origin and manufacture, date marking) including any requirement for it to be labelled as ‘fortified’ / ‘enriched’ etc.</li><li>● Take physical samples for qualitative or quantitative analysis</li><li>● Record data in the relevant inspection form</li></ul>
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## How to conduct import monitoring

Import monitoring involves documentation review, rapid-qualitative tests, and / or laboratory reports of quantitative tests performed on samples of imported foods. As mentioned, designated authorities responsible for inspecting the safety (and sometimes quality) of imported products are also responsible for assessing fortified products at border entry points. These inspectors use specific guidelines and checklists that complement imported food control processes to ensure imported food products consistently meet national requirements for fortified foods. In the case of fortified foods, the guideline and checklists ensure evidence presented by importers regarding the adequacy of food fortification is acceptable. This is best done by requiring importers to document that relevant foods conform with fortification requirements and by examining the accompanying Certificate of Analysis that declares whether the food fulfils national regulations.

Follow the four general steps outlined below to effectively monitor fortification of imported products.

### Step 1:

#### **Inspect Certificate of Conformity (CoC) and Certificate of Analysis (CoA) from each shipment of imported food that requires fortification.**

Certificates of Conformity (CoC) are provided by manufacturers as a declaration they have fortified the food in accordance with regulatory requirements. Certificates of Analysis (CoA) provide evidence that the food has indeed been fortified and can be issued by a government authority or officially recognized testing body / laboratory from the country of origin. In some cases the CoC and CoA can be combined or a country may choose to only require a CoA as CoAs provide evidence the consignment has been fortified.

Inspectors should ensure the information outlined on both the CoC and CoA pertain to both the specific imported consignment and required fortification levels. For example, the parts per million (ppm) of each



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nutrient and the form of nutrient used should match what is required in the country's national fortification standards.

**See Annex B for two examples and interpretation of a CoA.**

Ensure the following:

1. Each lot has its own certificate(s) with the required information listed, such as lot number, date of production, expiration date, and vitamin and mineral content. The food should be traceable to the original producer despite the involvement of many traders in the supply chain.
2. The labels on the pallets or boxes have not been tampered with and correspond to the COA.
3. The CoC/CoA matches the requirements of the country's national standards for safety and quality.
4. The external packaging is intact and if damage has been done, the flour or rice sacks inside have not been torn.
5. The sacks provide evidence of fortification, such as a fortification logo and ingredient statement.
6. If a CoC/CoA is missing, then hold the lot until one is provided and verified. If any of the other points are not satisfied, the consignment should not be accepted.
7. Record inspection results on the appropriate form (Annex A, Tables A and B).
8. Keep documentation for up to one year beyond the Best Use By or Best Before Date.

## **STEP 2 (for brands that pass Step 1):**

### **Confirm presence of key vitamins and minerals to authorize entry**

1. Confirm compliance by qualitatively testing imported consignments at border points. While testing all consignments is preferred, at the least consignments should be sampled and tested on a regular basis to validate compliance. The degree to which confirmatory or monitoring testing is undertaken will depend on the resources available for import control.
2. From each batch or truck or consignment, randomly collect three samples (500g per sample) of imported fortified foods. Collect samples from the same brand names and appropriate qualitative tests corresponding to the specific food article.
3. All samples should test positive for the indicator nutrient. If not, collect three new samples and test again.

*If an importer disagrees with qualitative results conducted, divide the sample into two portions. One portion should be submitted by the government regulator to the laboratory for quantitative analysis. The importer may submit the other portion to a laboratory of his/her choice, but the official laboratory result takes precedent.*

## **STEP 3:**

### **Decision to authorize**

1. If samples fail to comply in terms of proper documentation, labeling requirements, or qualitative / quantitative testing, the affected brand should not be allowed in the country.
2. If documentation is correct and samples show the presence of the key vitamins and minerals, authorize importation.
3. Where resources are available, conduct quantitative tests of composite samples as outlined in Step 4. This verifies the decision at the importation site based on positive qualitative tests.



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4. Importers may request a quantitative test if the qualitative test results do not appear to meet the national standard. Products that did not pass the qualitative tests should not be tested quantitatively.

## Step 4:

### Composite Sample Testing

1. For each accepted brand: Take three samples of 500 grams each from the same producer and combine them in a 5,000-gram container labeled with the name of the imported brand. This is the inspector's composite sample. Write the date of sampling on the container, and keep it in a cool, dark, and dry place.
2. Test composite samples regularly, usually every four weeks. Send the collected composite samples to a designated laboratory. Protect the samples from exposure to heat, humidity, and light. Send all the samples that have been collected during this period. Package them well and be sure they are labeled correctly.

### Noncompliance and penalty

Countries should have non-compliance measures that are clearly outlined and documented. These measures include who is responsible for communicating to importers, when this communication is to happen, and the stepped approach to non-compliance measures. A stepped approach may include first warnings, then fines, confiscation of products, cancelation of product registration, etc. Proposed steps include:

1. Issue a warning letter to the non-compliant.
2. Multiple incidences of non-compliance by the same brand warrant that brand being put on a non-compliant list.
3. Future consignments of listed brands are checked more carefully:
  - a. Example: collect samples and test each of the next 5 consignments from the importer. If they pass, they should be removed from the non-compliant list
  - b. Quantitative testing of samples is the importer's expense
4. For repeated failures, consignments may be rejected. In this instance official notification is to be provided to the importer and action taken to reject, direct for reprocessing, re-export or destroy the consignment.

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## Annex A: Import Monitoring Tables for Customs Sites

ADAPTED FROM Solomon Islands & East, Central, and Southern Africa Health Community Manuals

Table A: INSPECTION AT IMPORTATION SITES

Date ..... POE ..... District/County/Subcounty .....

Name of Inspector: .....		Supplier Address: .....		Batch Numbers and Size (MT): .....	
Product: .....	Brand: .....	.....		Variety of Food (refined, whole, others): .....	
Country of Origin: .....		.....		Certificate of Conformity: .....	
Shipping Record ID: .....		Importer: .....			
		Name and Address: .....			
Product Examination, Labeling information <sup>1</sup>					
	Adequate	Inadequate	Comments		
Brand Name					
Manufacturer					
Nutrient Claims			Specify nutrients		
Expiry Date					
Batch Number					
Presence of Nutrient			Based on qualitative test on three samples per brand and per truck (consignment)		
Action:			Signature:		

<sup>1</sup> Mark with a tick (✓) in the adequate or inadequate boxes where applicable









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## CERTIFICATE OF ANALYSIS

Batch #: 181041 Date of manufacture: 10/09/2018  
 Best Before: 10/2020 Item Code: FG4002  
 Date of analysis: 10/26/2018

Product	USAID RUTF
Composition	Sugar, blend of non-hydrogenated vegetable oil (contains one or more the following: palm oil, soybean oil, canola oil), peanuts, nonfat milk powder, whey powder, stabilizer (fully hydrogenated vegetable fat), vitamin and mineral complex. Allergens: peanuts, dairy products. May contain traces of gluten. May contain traces of soy. Contains no ingredients of animal origin besides dairy products.
Description	Ready-to-Use Food with high nutritional value - Comida lista para usar con alta valor nutricional - Aliment de re-nutrition à haute valeur énergétique

Results are recorded in "Specification" units

Use this information to fill out Table A.

	Method	Specification	Result
Enterobacteriaceae	ISO/TS 21528-2 (sub 10)	[0;99] cfu/10g	<10
Fat (% kcal)	Calculation	[45;60] % kcal	57
Fat (grams)	AOAC 996.06	[26.8;36.3] g/100g	34.03
Iron	AOAC 985.35	[10;14] mg/100g	11
Protein (% kcal)	Calculation	[10;12] % kcal	10
Protein (grams)	AOAC 991.20	[11.1;16.2] g/100g	13.57
Salmonella	ISO/TS 6579 (375gx2)	0 cfu/375g	0
Salmonella	ISO/TS 6579 (375gx2)	0 cfu/375g	0
Total Aflatoxin	AOAC 990.33	[0;10] ppb	<0.2
Vitamin A	AOAC 2001.13	[963;1443] mcg/100g	1277
Vitamin C	AOAC 984.26	[96;129] mg/100g	110
Water Activity	AOAC 978.18	[0.2;0.5]	0.31

Look in this column for the vitamins and minerals of interest.

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"Specification" should match your country's requirements

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