

**Food Safety Regulation in Georgia:
Assessment of the Government's
Reform Efforts in 2016**

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AA	Association Agreement (between EU and other country)
ACDA	Agriculture Development Cooperative Agency
BIP	Border Inspection Point/Post
CBA-G	Capacity Building Agriculture – Georgia (project funded by Sida)
CDC	Center for Disease Control and Prevention (USA)
CIB	Comprehensive Institution Building
Danida	Danish International Development Agency
DCFTA	Deep and Comprehensive Free Trade Area (between EU and other country)
DG SANTE	Directorate General for Health and Consumers (of the European Union)
DTRA	Defense Threat Reduction Agency (of the United States Department of Defense)
EPF	Europe Foundation (previously Eurasia Partnership Foundation)
EU	European Union
FAO	Food and Agriculture Organization (of the United Nations)
FBO	Food Business Operator
FSSC	Food Safety System Certification
FVO	Food and Veterinary Office (of the DG SANTE)
GAC	Georgian Accreditation Center, Unified National Body of Accreditation
GeoSTM	Georgian National Agency for Standards and Metrology
GlobalGAP	Global Good Agricultural Practices
GIZ	German Organization for International Cooperation
GMP	Good Manufacturing Practice(s)
GoG	Government of Georgia
HACCP	Hazard Analysis Critical Control Points (system controlling food processing risks)
IFC	International Finance Corporation (of the World Bank Group)
IRDP	Institutional Reform and Development Plan (previously Institutional Reform Plan)
ISO	International Organization for Standardization
LMA	Laboratory of the Ministry of Agriculture of Georgia
MLHS	Ministry of Labor, Health and Social Issues (of Georgia)
MoA	Ministry of Agriculture (of Georgia)
MoESD	Ministry of Economy and Sustainable Development
MoF	Ministry of Finance
MoIRD	Ministry of Infrastructure and Regional Development
MRL	Maximum Residue Limit
NCDC	National Center of Disease Control and Prevention (of the MLHS)
NFA	LEPL National Food Agency of the Ministry of Agriculture of Georgia
OIE	World Organization for Animal Health
RS	Revenue Service of the Ministry of Finance of Georgia (responsible for BIPs)
SOP	Standard Operating Procedure
SPS	Sanitary and Phytosanitary (measures in the WTO and DCFTA agreements)
SRCA	Scientific Research Center
UN	United Nations
UNDP	United Nations Development Programme
USAID	United States Agency for International Development
USDA	United States Department of Agriculture
UWSC	United Water Supply Company of Georgia
WB	World Bank
WHO	World Health Organization (of the United Nations)

EXECUTIVE SUMMARY

This assessment represents Europe Foundation’s sixth annual assessment of the Georgian government’s food safety regulatory system and reforms. As with prior Europe Foundation (EPF) annual assessments, the term “food safety” is used in its broader definition throughout this report, except where noted, to include not only the safety of food items, but also veterinary (animal health), phyto-sanitary (plant protection), and epidemiology (human health and foodborne illnesses), which directly affect the quality and safety of Georgia’s food supplies and, therefore, consumers’ health.

While the GoG’s efforts to develop the nation’s food safety system has been faster and more systematic since 2012, the GoG’s reforms are being rolled out in multiple stages, which are highlighted in key reform documents, such as “Georgia’s Action Plan for the Implementation of DCFTA, 2014-2017”, the “DCFTA-AA Approximation plan 2015-2027”, and the “Institutional Reform and Development Plan, 2017-2019”. As such, there are many areas for which reforms have not yet been introduced, which results in continuing challenges and gaps within the system, ranging from the development of internal standard operating procedures (SOPs) to the lack of clarity about which state entity has a mandate for a specific control activity. It is expected that, as the GoG continues to implement its reforms, these gaps will be gradually resolved.

The MoA has approximated 55 legal instruments and is on schedule in 2015 through 2016. However, many of these have transition periods of 1-2 years before full enforcement of all articles and some have been delayed until 2020. For some of the acts, transition periods are required to ensure successful implementation, though these transition periods are understood by many stakeholders as a delay rather than as an extended period for compliance to begin immediately with penalties applied after the transition period. Similarly, these long periods jeopardize the credibility of the new legislation and the whole process, while leaving consumer safety at risk.

This assessment report notes the achievements of the GoG in its efforts to establish a fully functional food safety system throughout the country to ensure safe food and health for Georgia’s consumers. This report also identifies areas where there are gaps in processes, mandates, implementation, program administration, etc., followed by a complete set of conclusions and recommendations. The key conclusions and recommendations for each institution involved in the reforms are included below:

Key Findings and Observations

- The legal approximation process appears to be technically transparent and participatory. However, interview and focus group respondents indicated they would like to be engaged earlier in the drafting process, want more information from MoA, and want more communication channels besides MoA’s website.
- With new inspection and control responsibilities and an increased scope of control added annually, the National Food Agency (NFA) will continue to require additional qualified personnel with the appropriate education, training, and skills. There is also a shortage of food safety expertise within the private sector. This said, the NFA continued its institutional development process, finalizing several SOPs and action plans for its departments, with the Quality Management Department finalizing an additional 11 SOPs by the end of 2016.
- As turnover of NFA’s non-management level staff is high, there is the risk that NFA will not be able to sustain its institutional knowledge as staff changes over time, which will require a more systematic approach for identifying training needs and providing training on a sustainable basis for current and new employees.
- As indicated by interview and focus group respondents, the level of public awareness of the existence of the NFA Hotline to submit complaints is very low. Respondents claimed that none of the participants had known or even heard of the NFA prior to their “incident” and that all participants had to conduct their own research to find out which responsible agency to contact.

- The NFA hosts a “civic hall” public forum where the GoG can advise and collect input from these stakeholders directly through public-private dialogue. While these civic halls were created by the NFA in collaboration with CSOs to ensure the necessary input and involvement from the private sector and CSOs, it is clear that this initiative needs further improvements. There were only three events held in 2016, which is not frequent enough, and, according to interviewed experts, the meetings were not well organized and were too short to adequately cover the material discussed.
- With new inspection and control responsibilities and an increased scope of control added annually, particularly in 2020, the NFA will continue to require additional qualified personnel with the appropriate education, training, and skills.
- There is still a lack of control for FBOs with less than GEL 200,000 of annual revenues. This continues to represent a risk to consumer safety, since a high portion of Georgia’s food is produced by these small FBOs.
- Enforcement of Hazard Analysis and Critical Control Points (HACCP) requirements for relevant FBOs improved in 2016. While not all have HACCP systems in place, the number of dairy processors and slaughterhouses recognized and HACCP approved has increased. However, there is no data available about the number or percentage of these FBOs that have implemented HACCP.
- Provisional approval was issued to 489 FBOs and final approval to 42 FBOs in 2016. This is a significant increase over 2015, when only 147 received provisional approval. Despite this increase in compliance, it still only represents a small portion of the market. There is no data to confirm what percentage of food in Georgia is sold under food safety controls.
- NFA’s FBO registration software is complete and data from 20,310 FBOs has been verified and uploaded into the system. However, there are no clear estimates of how many FBOs do exist and operate without having not been verified and included in the NFA’s database.
- In 2016, NFA’s Food Safety Department conducted 5,381 planned inspections (+42%), 613 unplanned inspections (-13%), and 9,242 documentary checks (+13.8%), which all represent positive developments related to food quality and safety.
- The NFA’s Veterinary Department has introduced and implemented a system of surveillance, serosurvey testing, vaccinations, and insecticide applications on both a risk-based and actual threat observed basis for 11 different animal diseases.
- While the control of the use of veterinary medicines and agricultural chemicals was very weak prior to 2016, the legislative framework has improved. This has resulted in the NFA directing their inspections of veterinary medicine retailers to withdraw any illegal medications from the market. However, there are no estimates or databases of what percentage of veterinary retailers have been inspected or the level of non-compliance.
- NFA became a member of European and Mediterranean Plant Protection Organization (EPPO), leading to an improved phytosanitary control program, which has benefited in the development of its phytosanitary control program for 2017 during the second half of 2016. The NFA is also conducting the approximation process related to phytosanitary issues, developing SOPs, and creating a register of phytosanitary FBOs. Subsequently, the FAO launched a Technical Cooperation Program Facility (TCPF) project to conduct a Phytosanitary Capacity Evaluation of the phytosanitary system of Georgia.
- In 2016, the NFA conducted 462 samples of the water supply systems, resulting in a 47% of samples deviated from the WHO standards established by Georgian law. 90% of NFA’s negative results for water supply system tests are from microbiological contamination from rural villages. However, urban areas have better water supply systems and lower occurrence of violations, as also highlighted by UWSC’s low contamination statistics.
- UWSC claimed that its testing processes have improved dramatically, with only 691 out of 44,354 tests (1.56%) of headworks, ground water, and drinking water conducted in 2016 contained deviations from the standard, and there were no critical violations in 2016.

- The Revenue Service (RS) enhanced the infrastructure at three of its Border Inspection Points (BIPs), Kartsakhi, Poti and Adlia, with EU-compliant border inspection equipment, and has begun improvements at Red Bridge BIP and Sadakhlo BIP as well.
- The RS staff developed draft manuals and SOPs in 2016 for veterinary (meat and live animals) and phytosanitary controls, which will be adopted later in 2017.
- The number of detected violations for veterinary, phytosanitary, and GMO control increased from 2015 to 2016. Veterinary issues in particular need more attention since the detected violations increased significantly in 2016.
- The NCDC completed the draft of the National Strategy on Antimicrobial Resistance and submitted it to the MLHS for approval in 2016.
- In 2016, the overall sanitary-hygienic normative framework was updated through the introduction of several key pieces of legislation introduced through the approximation process.
- The Georgian National Agency for Standards and Metrology (GeoSTM) adopted 13 ISO standards related to proficiency testing and food safety analysis.
- The Georgian Accreditation Center, Unified National Body of Accreditation (GAC) established a mandatory requirement for all accredited laboratories to conduct proficiency testing or inter-laboratory comparisons (PT/ILCs) with “positive results”.
- GAC passed European Accreditation’s (EA) final audit in November and expects that a Bilateral or Multilateral Agreement for Mutual Recognition with the EA in 2017.
- While the SRCA’s Risk Assessment Division is trained to conduct risk assessments related to food safety, it does not have the same capacities to conduct risk assessments for veterinary and phytosanitary risks, for which it has been mandated to conduct in 2016 by the MoA.
- A continuing challenge is in the lack of hazard-specific risk assessment policies at the MoA that are consistent with the requirements of EFSA and the Codex Alimentarius. The current generalized risk assessment policy does not contain the relevant info for the SRCA to conduct detailed risk assessment based on the MoA’s policy.
- Respondents claimed that most laboratory service industry revenues are generated by public tenders, resulting in a high level of competition between the Laboratory of MoA (LMA) and private laboratories.
- There is not a high volume of private sector laboratory analyses conducted because the NFA has only an annual inspection requirements for FBOs, which is not frequent enough to properly control and guarantee the implementation of food safety systems within many FBOs. However, some FBOs have claimed that the NFA’s requirement for laboratory analyses already has increased to be conducted on quarterly basis.

Key Recommendations

- MoA/NFA should begin a proactive campaign to recruit, train, and develop an expanded workforce both in the Head Office and in the Regional Offices.
- The NFA, with other GoG ministries, should implement a more efficient method to inform FBOs on new requirements.
- NFA should introduce more targeted (specific topics) and more frequent Civic Hall meetings to ensure public input is fully participatory and inclusive of relevant stakeholders’ perspectives.
- With a very low public awareness levels, the GoG should increase public outreach efforts, particularly in rural areas, where awareness is the lowest among both FBOs and consumers, as well as awareness of the NFA Food Safety Hotline for submitting complaints.
- Based on the survey responses indicating that 90% of individuals were unaware of CSOs operating in the food safety field or their activities, the NFA should better coordinate with CSOs to accomplish common goals by providing food safety-related information to the general public and/or, potentially, by conducting joint public awareness activities.

- NFA, through the MoA, should encourage Parliament to initiate changes to legislation to accelerate the inclusion within its control of small FBOs that generate less than GEL 200,000 in annual revenues prior to 2020.
- NFA should consider developing an electronic traceability platform for FBOs to trace their suppliers via personal or company identification numbers, linked to the RS's transportation/sales electronic documentation system already in place.
- NFA should place stricter, more technical requirements in its procurement requests for laboratory services related to outbreak investigations.
- The NFA should consider modifying its inspection interval requirements to focus on a risk-based basis for determining an appropriate frequency (i.e., monthly, quarterly, annual) of conducting laboratory analysis for each type of FBO.
- The SRCA should review the risk assessment capabilities throughout its departments to determine how to aggregate these functions to ensure efficacy in conducting veterinary and phytosanitary risk assessments appropriately.
- GoG ministries should support accredited laboratories to comply with PT/ILCs requirements and encourage the LMA should develop the capacity to become a reference laboratory and reduce the number of routine analyses. The GoG should also promote the establishment of one or multiple reference laboratories to cover most methodologies related to analyses for food safety, veterinary and phytosanitary.
- The Ministry of Labor, Health, and Social Affairs (MLHS) should finalize approval for the National Strategy on Antimicrobial Resistance and incorporate it into its annual action plans.
- The MoIRD should identify a strategy to determine the discrepancies between the NFA sampling results and those from water distributors and create action plans in cases of confirmed non-compliances.
- The Parliament, with the MoA, should introduce changes to the Georgian law "Code on Food/Feed Safety, Veterinary and Plant Protection" to adjust the level of penalties for food safety violations to make them relevant to ensure compliance according to the seriousness of the violation(s) and the production capacity of respective FBO.
- The Investigative Service (IS) should coordinate with the NFA and the RS to align activities regularly as the legal approximation process introduces new control requirements each year.

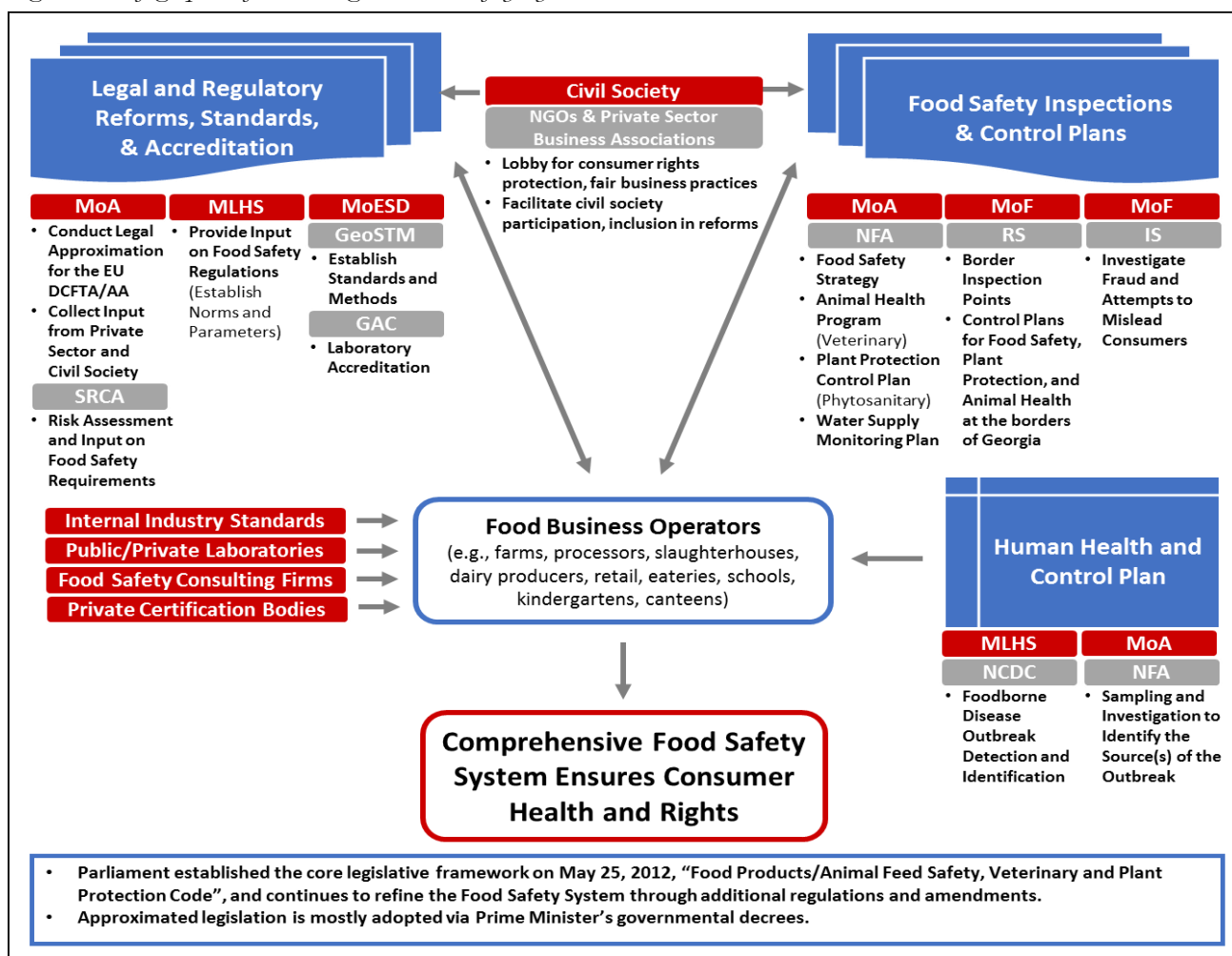
INTRODUCTION

A. INSTITUTIONAL CONTEXT

The Georgian food safety system has developed significantly since the introduction of the “Code of Food/Feed Safety, Veterinary and Plant Protection” in 2012 and the signing of the Association Agreement with the EU in 2014. Through the efforts of the GoG, the participation of the private sector and civil society organizations, and the support of the donor community, the FS has assumed multiple levels of control and monitoring for food products produced in Georgia and imported from other countries, as well as multiple dimensions of veterinary and phytosanitary programs to ensure the health and safety of animals and plants in Georgia. In addition to the GoG's efforts to approximate numerous legal instruments to be congruent with EU food safety regulations and standards, which requires the active participation and contribution of many public and private stakeholders, and its ongoing food safety inspection and control programs, the GoG also manages a control plan for human health issues.

As seen in the following infographic, the GoG, through its subordinate agencies, maintains an additional food safety control mechanism by detecting, identifying, and investigating foodborne disease outbreaks. Furthermore, the private sector stimulates increased compliance and improved food safety practices through the development of internal industry standards, public and private laboratories analysis for food products, services provided by food safety consulting firms, and the issuance of private food safety certifications. Similarly, civil society facilitates engagement with consumers and the inclusion of their perspectives in reforms, while lobbying to ensure protection of consumer health.

Figure 1 - Infographic of the Georgian Food Safety System



The GoG's efforts to develop the nation's food safety system has been quicker and more systematic since 2012; however, the GoG's legislative reforms are being rolled out in annual stages, resulting in many areas for which reforms have not yet been introduced.¹ This has also resulted in continuing challenges and gaps within the system, ranging from the development of internal standard operating procedures (SOPs) to the lack of clarity about which state entity has a mandate for a specific control activity. It is expected that, as the GoG continues to implement its reforms, these gaps will be gradually resolved.

This assessment report takes note of the achievements of the GoG in its efforts to establish a fully functional food safety system throughout the country to ensure safe food and health for consumers in Georgia and export markets. However, this report also identifies areas where there are shortcomings in some processes, agency authorities and responsibilities, implementation, administration, etc. Conclusions and recommendations are provided at the end of the report for specific state institutions participating in the food safety reform process, which will serve the GoG as it proceeds with the next stages of reform.

B. INSTITUTIONAL DEVELOPMENT SINCE 2005

In December 2005, the GoG passed the “Law of Georgia on Food Safety and Quality” to simplify and improve the national system related to food safety (including veterinary, and plant protection). This law eliminated multiple disparate food-regulating institutions and consolidated all the GoG's food safety efforts into a single unified body, the National Service of Food Safety, Veterinary and Plant Protection under the Ministry of Agriculture of Georgia (NS). In 2011, the NS was reorganized as an LEPL and renamed the National Food Agency of the Ministry of Agriculture of Georgia (NFA), providing the NFA increased independence and operating flexibility.²

From 2005-2012, the food safety law's enforcement suffered due to the GoG's general policy to deregulate economic activities. In 2011, an EPF report on Georgian sanitary and phytosanitary measures stated, “The enforcement of the law has been repeatedly postponed (in December 2006, June 2007 and December 2009). The legal clauses that represented the mechanism of enforcement of the law, namely, provisions regulating state inspections, were suspended during this period. The requirements to introduce the Hazard Analysis and Critical Control Points (HACCP) system were also postponed.”³

The 2005 law was repealed in 2012 and replaced with the law on “Code of Food/Feed Safety, Veterinary and Plant Protection”, which continues to serve as the prevailing legislation under which the GoG implements the national food safety system. Food safety regulation was reintroduced as a priority from 2011-13 as the potential for an Association Agreement (AA) with the EU developed, though implementation and enforcement was limited.⁴

The AA between the EU and Georgia – which was signed on June 27, 2014 and entered into force on July 1, 2016 – established the Deep and Comprehensive Free Trade Area (DCFTA) with EU member states. Under this agreement, Georgian companies have increased access to the EU export markets with better terms, based on having a harmonized system of regulations. The GoG's process to approximate 271 EU regulations is ongoing, and the benefits of increased access are available for Georgian exporters with zero import duties, if food safety and product safety standards are met.

¹ Annual plans for reforms are highlighted in key reform documents, such as “Georgia's Action Plan for the Implementation of DCFTA, 2014-2017”, the “DCFTA-AA Approximation plan 2015-2027”, and the “Institutional Reform and Development Plan, 2017-2019”.

² Institutional Reform and Development Plan – IRDP, NFA Medium-term Development Programme for 2017-2019, LEPL National Food Agency of the Ministry of Agriculture of Georgia, Tbilisi, 2016.

³ Nino Chokheli, Sanitary and Phytosanitary Measures, Implementation of European Neighbourhood Policy Action Plan in Trade and Trade-Related Areas in 2010, Tbilisi, 2011, <http://www.epfound.ge/wp-content/uploads/2016/09/Implementation-of-European-Neighbourhood-Policy-Action-Plan-for-Georgia-in-Trade-and-Some-Trade-Related-Areas-in-2010-report-summaryENG-1.pdf>.

⁴ Europe Foundation, Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015, http://www.epfound.ge/gruzja/wp-content/uploads/2016/09/Food-Safety-Regulation-in-Georgia_Assessment-of-Government%E2%80%99s-Reform-Efforts-in-2015-ENG-1.pdf.

C. ASSESSMENT METHODOLOGY

Focus and Terminology

This assessment represents Europe Foundation's sixth annual assessment of the Georgian government's food safety regulatory system and reforms. While there are numerous Government of Georgia (GoG) line ministries and state agencies involved in the performance and development of the food safety system, the primary focus of this assessment relates to the Ministry of Agriculture (MoA) and the National Food Agency of the MoA (NFA) as these two GoG entities are the primary organizations responsible for regulating food safety in Georgia. Given the extensive collaboration with other line ministries and state agencies, the donor community, international and local non-governmental organizations (NGOs), and the private sector, this assessment highlights these organizations' activities related to food safety reform and regulation in Georgia. As with prior Europe Foundation (EPF) annual assessments, the term "food safety" is used in its broader definition throughout this report, except where noted, to include not only the safety of food items, but also veterinary (animal health), phyto-sanitary (plant protection), and epidemiology (human health and the spread of foodborne illnesses), which directly affect the quality and safety of Georgia's food supplies and, therefore, consumers' health.⁵

Data Collection and Analysis

The assessment team, composed of international and national specialists, initially conducted background research through a desk review of prior assessments of the GoG's reform efforts related to food safety regulation in Georgia, any relevant strategy documents and reports issued by the GoG and/or civil/donor organizations, relevant survey reports on consumers or food business operators (FBO), and other public information provided by GoG and European Union (EU) entities to identify the GoG's prior activities and reforms, as well as the goals for 2016.

The assessment team utilized two qualitative, semi-structured evaluation tools for our activities: (1) key informant interviews with industry experts, GoG representatives, civil society representatives, FBOs, and consumers,⁶ and (2) focus groups including urban and rural FBOs, importers, laboratory representatives, and urban and rural consumers.

The methodology utilized is based on open-ended semi-structured questioning as defined by Rubin and Rubin, 2012⁷ as well as Edwards and Holland, 2013⁸. Interview participants were targeted to collect qualitative data by setting up situations allowing the interviewee to have enough time and scope to talk about his/her opinions on a subject, with the objective being to understand the interviewee's point of view by building a rapport with him/her to make the interview more like a conversation than an investigation. For these interviews and the focus groups, our team developed customized questionnaires based on the interviewees' roles and responsibilities related to the food safety system in Georgia that provided the assessment team flexibility in developing a clear understanding of the his/her perspectives and to gather in-depth insights through a combination of formal and informal discussions that also explore topics of interest to the interviewee related to the evaluation more deeply.

To ensure an objective final assessment report, our team collected information from multiple stakeholder groups and geographic areas, incorporating responses from GoG representatives, civil society, the business community, donor organizations, and other foreign experts working in Georgia. Specifically, we conducted in-depth interviews with 40 respondents across Georgia (list of cities).⁹

Furthermore, the assessment team collected qualitative, perception-oriented data by conducting focus groups according to the following schedule:

⁵ Europe Foundation, *Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015*.

⁶ For a list of respondents interviewed, see Annex 8.

⁷ Herbert J. Rubin and Irene S. Rubin, *"Qualitative Interviewing: The Art of Hearing Data"*, 3rd Ed. SAGE Publications Inc, 2012.

⁸ Rosalind Edwards and Janet Holland, *"What is Qualitative Interviewing?"*, A&C Black, 2013.

⁹ For a full list of individuals interviewed, see Annex 1.

- FBOs inspected by the NFA in 2016 (three groups: in Tbilisi, Batumi, and Marneuli);
- Importers (two groups: in Tbilisi and Batumi);
- Representatives of private laboratories (in Tbilisi);
- Consumers facing problems regarding food consumption (in Tbilisi)¹⁰;
- Urban consumers (a control group in Tbilisi);
- Rural consumers (a control group in Ozurgeti).

These focus group discussions provided a deep understanding of overall attitudes and perceptions of the participants related to the success of the different GoG entities in implementing the 2016 food safety reform agenda. Each group was composed of representatives of the target groups, with approximately 5-10 participants for each group, in line with the qualitative research principle of ensuring that the groups will be “small enough that everybody has an opportunity to share his/her perceptions, and big enough to provide a diversity of perceptions”.¹¹

To complement this qualitative analysis, the assessment team also conducted relevant quantitative analysis and collected statistics on the performance of the Georgian food safety system in 2016.

Based on the conclusions of these analyses, the assessment team developed actionable recommendations related to the GoG's food safety reform efforts, particularly regarding the relevance, effectiveness, impact, and sustainability of the results of the GoG reform efforts, which can serve as a guide on how to foster more effective reforms toward a fully functioning food safety system.

The report focuses on developments related to the food safety system since the signing of the Association Agreement with the EU on June 27, 2014, since the efforts of the Georgian authorities to be evaluated are primarily directed by the terms of the Association Agreement. To ensure the proper understanding of the material presented, this report outlines the historical, verifiable performance-related findings first and then the perception-based observations of the focus groups conducted by the assessment team. The observations from the focus groups include the participants' perceptions of the GoG entities and their activities related to the development and reform of the food safety system.

The conclusions and recommendations are provided in the closing section of this report and are based on findings from the qualitative and quantitative data collected during the assessment.

¹⁰ A focus group for consumers who had submitted complaints in Batumi was planned; however, there were only five complaints submitted by consumers residing in Adjara in 2016, and only three were willing to speak with the assessment team. Therefore, the focus group was cancelled and the three individuals were interviewed instead. Their names are not included in the list of respondents to maintain their confidentiality.

¹¹ A. N. Oppenheim, “Questionnaire Design, Interviewing and Attitude Measurement”, 1992; Richard A. Krueger, “Focus Groups: A Practical Guide for Applied Research”, 1994; D. L. Morgan, “Focus Groups: The Qualitative Research”, 1988; F. N. Mattar, *Pesquisa de Marketing*, 1994.

LEGISLATION AND STATE POLICY

A. APPROXIMATION OF GEORGIAN LEGISLATION WITH EU LEGISLATION

Status of Approximated Legal Instruments

In 2014, the legal approximation plan was agreed between the EU and the GoG; however, this plan was later revised in 2015 and informally agreed upon with DG Sante. Even though this version had not been officially approved, the GoG followed its implementation guidelines and benchmarks to ensure the timely adoption of reforms. This updated version was not officially approved in 2016; however, it eventually was approved and signed by the MoA and DG Sante only in March 2017 and became an annex to the AA.¹² This approximate plan specifies the approximation of 271 normative acts with the EU's food safety regime to take place from 2015 to 2027. The schedule of normative acts to be harmonized is outlined in the following table:

Figure 2 - Legal Approximation Plan Schedule¹³

Policy Area	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
Food Safety	16	13	9	6	7	9	7	7	8	7	4	9	-
Veterinary	10	9	7	9	7	7	5	9	3	5	4	6	3
Phytosanitary	4	3	3	9	8	10	4	10	12	7	7	8	-
Total	30	25	19	24	22	26	16	26	23	19	15	23	3

In 2016, the MoA completed 100% of its commitment to approximate 25 normative acts with EU standards, with 13 related to food safety, 9 related to veterinary standards, and 3 related to phytosanitary. In addition, the MoA finalized the approximation of the outstanding legal instruments from the 2015 approximation plan. This is a key achievement, since 55 legal instruments have been approximated and the MoA is on schedule.¹⁴ However, many had transition periods of 1-2 years before full enforcement of all articles and some have been delayed until 2020. For some of the acts, transition periods are required to ensure successful implementation, though these transition periods are understood by many stakeholders as a delay rather than as an extended period for compliance to begin immediately with penalties applied after the transition period. Similarly, these long periods jeopardize the credibility of the new legislation and the whole process, while leaving consumer safety at risk.

The legal approximation process is very complex, with each of the three food safety competency areas represented by a separate Working Group within the MoA. These three Working Groups coordinate with the NFA on translation and modification of the acts to ensure they are appropriate for Georgia's socio-economic context. During this process, the MoA announces the expected changes on its website and requests input from external stakeholders, such as the private sector, the NGO community, donor organizations, and civil society. However, many respondents complained that this is not enough to ensure that the consumers and business sector's opinions and needs are fully integrated into the process and that the actual approximation process is not easily understood. As a potential solution, some respondents proposed that the MoA post three documents online within the public-private dialogue input collection process of legal approximation: the Georgian draft legislation, the English language version of the EU regulation, and the translated version of the EU regulation. All of these documents are readily available for the MoA and NFA's internal use for approximating legislation.

Moreover, respondents claimed that posting draft legislation on the MoA's website is not only an inefficient way to communicate since it is only one direction and unpredictable, but also that they would prefer to either be involved in the preparation of the draft prior to online submission for comments. The need for this earlier participation by the private sector and civil society organizations (CSOs, including

¹² While technically outside the timeframe of this assessment, this development of significant importance occurred prior to this report's publication and was included to provide a more complete representation of the current situation.

¹³ Ministry of Agriculture website, "DCFTA Obligation", downloadable PDFs: <http://moa.gov.ge/Download/Files/130>, <http://moa.gov.ge/Download/Files/131>, <http://moa.gov.ge/Download/Files/132>.

¹⁴ For a full list and descriptions of the legal instruments planned for approximated in 2016, see Annex 1.

business associations) is evidenced by the instances of the correction of several normative acts after they have been made law by governmental decree, requiring additional efforts from the private sector, CSOs, and the GoG to make the necessary changes to adapt the normative acts appropriately.

Furthermore, the NFA hosts a “civic hall” public forum where the GoG can advise and collect input from these stakeholders directly through public-private dialogue. While these civic halls were created by the NFA in collaboration with CSOs to ensure the necessary input and involvement from the private sector and CSOs, it is clear that this initiative needs further improvements. There were only three events held in 2016, which is not frequent enough, and, according to interviewed experts, the meetings were not well organized and were too short to adequately cover the topics discussed.

In September 2016, the EPF organized a retreat to discuss how to improve the civic hall structure and processes, which was attended by 2 NFA representatives and representatives from 7 CSOs. This retreat resulting in the proposal to establish 5 working groups under the civic hall structure to meet regularly, including (1) food safety information provision, (2) food safety import regulations, (3) food safety implementation, (4) transparency in control results, and (5) civil society awareness of food safety. While these working groups could help to improve the structure of civic engagement, these recommendations have not yet been adopted.

Implications

As the GoG introduces new reforms, it must continue to be systematic regarding the introduction of new inspection and control requirements to eliminate any remaining gaps and to ensure compliance by Food Business Operators (FBOs)¹⁵. In 2016, new legislation increased the NFA's mandate to enforce food safety regulations; however, the enforcement of these regulations has been delayed until 2017, which will require further analysis in future assessments. Specifically, the Law of Georgia No. 5568 on Amendments to Law No. 6155 on Code of Food/Feed Safety, Veterinary and Plant Protection strengthened enforcement of unregistered and/or unrecognized FBOs to include suspension of business activities in addition to the ability to levy fines. These requirements for unregistered and/or unrecognized FBOs will be in force by the NFA beginning on January 1, 2017. The NFA's ongoing mandate to fine and suspend the operations of registered FBOs for non-compliance remained unchanged.

These fines are set by legislation and remained at GEL 500, which is inadequate to deter non-compliance for most commercial operations, based on FBOs receiving fines once per year on average. As indicated by respondents in interviews and focus groups, the low cost of fines, coupled with a low level of enforcement, creates a disincentive for compliance. In other words, the fines themselves and the probability of receiving a fine are expected to cost less than the cost of compliance as a registered FBO. Still, the fines are equally applied to FBOs of all sizes, when respondents indicated that a revenue-based penalty system would be more appropriate and fair.

This shortcoming is particularly acute for unregistered companies. Many respondents cited this as negatively affecting competition and damaging the sales revenues of those compliant, registered companies since the unregistered firms can charge lower prices for their products since they do not invest in appropriate infrastructure, equipment, and food safety systems. This has resulted, over the years, in the presence of many outdoor vendors operating without permits for outdoor trade, which are issued and monitored by local municipalities. In combination with perceived excessive inspections for some FBOs, this creates an incentive for companies to avoid registration in some cases. For example, some respondents indicated that some FBOs are visited by NFA inspectors up to six times per year without tangible results. This risk should be further addressed in future assessments.

¹⁵ The term “Food Business Operator” refers broadly to all firms involved in the production, processing, transportation, storage, and sales of food products, such as farms, processors, slaughterhouses, dairy producers, retail, eateries, schools, kindergartens, canteens.

As outlined in the EPF 2015 assessment, there is a lack of control for small FBOs that have less than GEL 200,000 of annual revenues until 2020, even though registration of these businesses as FBOs is required.¹⁶ In 2016, this situation remained the same, and the NFA did not have the authority to inspect these FBOs. This continues to represent a risk to consumer safety, since a high portion of Georgia's food is produced by these small FBOs. As such, the NFA should consider opportunities to accelerate control over small FBOs. This will have the additional benefit of preventing growing FBOs from developing multiple companies to avoid crossing over this threshold, which has been cited by several respondents as a current activity in the market.

A key development related to enforcement in 2016 was the enforcement of HACCP requirements for relevant FBOs (i.e., dairy processors, slaughterhouses). Fines and suspension of activities are applied for non-compliance for both registered and recognized FBOs. While not all have HACCP systems in place, the number of dairy processors and slaughterhouses implementing HACCP has increased. However, there is no data available about the number or percentage of these FBOs that have implemented HACCP requirements. Many FBOs have been allotted additional time to finalize the HACCP process, since the process requires a substantial investment of time.

Additionally, the NFA provided provisional approval to operate as producers of food products of animal origin to 489 FBOs and final approval to 42 FBOs in 2016. This is a significant increase (+232.7%) over 2015, when only 147 received provisional approval. Despite this increase in compliance, it still only represents a small portion of the market. For example, although there is no reliable data for the unregistered food production segment, industry experts estimate that the number of cheese producers that are unregistered could be up to or even greater than 50%. In fact, there is no data to confirm what percentage of food in Georgia is sold under food safety controls.

In 2016, compliance related to the government's decree No. 90 on Special Rule of Hygiene of Food of Animal Origin, which requires "all domestic animals intended for sale be killed at slaughterhouses", has improved. In 2015, based on GeoStat data, excluding poultry, 97.7% of animals killed under veterinary control at slaughterhouses were cattle (74.4%) and pigs (23.3%), but this expanded in 2016 to include a higher number of sheep (increased from only 5,022 head in 2015 to 59,751 in 2016).¹⁷ The increased veterinary control requirement is evidenced by the comparison of animals inspected in slaughterhouses in 2015 and 2016. Specifically, according to GeoStat, the number of poultry slaughtered under veterinary control increased from 396,031 in 2015 to 1,611,686 in 2016 (an increase of 307%), and the number of cattle, pigs, and sheep slaughtered under veterinary control increased from 221,325 head in 2015 to 365,433 in 2016 (an increase of 65.1%).¹⁸

Additionally, the monthly percentage of animals slaughtered under veterinary control compared to the total number of animals slaughtered has increased from 27% to 46% for cattle, 19% to 45% for pigs, 1% to 8% for sheep, 2% to 8% for poultry from 2015 to 2016, respectively. Furthermore, assuming that a substantial proportion of animals are slaughtered for home consumption, it is possible to estimate that less than 50% of meat consumed has been slaughtered under veterinary control in 2016.¹⁹ This represents an ongoing risk to consumer health and should be addressed in future assessments.

It is important to note that the statistics for poultry are not comprehensive, given that many large chicken farms have their own slaughterhouses and veterinarians, and these figures are not captured by the GeoStat statistics. Although the percentage of sheep slaughtered under veterinary control is low, the percentage of sheep destined for home consumption is larger than that for cattle and pigs, so it is not expected that the rate of veterinary control over sheep will reach the same levels. Still, the increase from 1% to 8% represents significant growth in control.²⁰

¹⁶ Europe Foundation, Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015.

¹⁷ Based on a comparison of NFA inspection reports and GeoStat production data.

¹⁸ Georgian National Statistics Office, GeoStat. www.geostat.ge.

¹⁹ Ibid.

²⁰ For additional details on animals slaughtered under veterinary control, see Annex 2.

B. ADDITIONAL POLICIES AND STANDARDS

The SRCA of the MoA has been active in conducting numerous food risk assessments since it was created in 2014. Within its scope of activities, the SRCA has identified specific risks within the Georgian food safety system and has recommended specific policy actions that have resulted in the introduction of two new regulations in 2016, including:

- Regulation on the (EC) No 1333/2008 of The European Parliament and of the Council of 16 December 2008 on Food Additives
 - While this regulation was already scheduled for later in 2016, the SRCA risk assessment report accelerated the adoption of it.
- New import requirements on poultry and mechanically-separated meat (MSM)
 - The SRCA recommended that the RS require a laboratory test certificate from the country of origin for these imported products, which was adopted in 2016 (Amendment No. 53).

Although not a new regulation, the regulation on “Foodborne Inorganic Arsenic Risk for Population” was maintained after the SRCA lobbied to keep it. Since the EU does not have this regulation as a separate legal document, the GoG was going to repeal it, but the regulation was maintained due to arsenic soils being problematic in some regions.

Additionally, the 2015 government decree #2567 to limit the presence of trans fatty acids in food products was later converted to law in 2016, which will come into force on August 1, 2017. Similarly, the regulation on Food Safety Risk Assessment, Management, and Communication passed in December 2015, which was highlighted in the EPF 2015 assessment, has been implemented in 2016. The implementation of the Food Safety Risk Analysis framework has improved, with roles and responsibilities specified for specific organizations.

In 2016, the MoESD's state agency, GeoSTM, also adopted 13 international or EU standards related to proficiency testing and food safety analysis. The standards adopted include eleven food product standards under Technical Committee 3 (Food Product Standards) related primarily to microbiological testing. Additionally, the list of standards adopted includes two conformity assessment standards under Technical Committee 2 (Quality Management and Certification) related to proficiency testing and drafting normative documents.²¹

²¹ For a full list and descriptions of all standards adopted by GeoSTM in 2016, see Annex 3.

INSTITUTIONAL REFORM & OTHER DEVELOPMENT ACTIVITIES

A. INSTITUTIONAL REFORM AND CAPACITY DEVELOPMENT

The two primary GoG entities responsible for food safety monitoring and control are the NFA and the Revenue Service (RS) of the Ministry of Finance (MoF), which is solely responsible for border control. An essential prerequisite for implementing the GoG's efforts to reform the national food safety system is the establishment of a sufficient level of institutionalized capacity, both in terms of processes and skills, within the NFA and RS. The NFA had developed and implemented its "NFA Institutional Reform Plan, 2011-2013", but had failed to revise this reform plan in 2014 and 2015. However, in 2016, the NFA developed and approved its "Institutional Reform and Development Plan (IRDP), 2017-2019", which was prepared in collaboration with the NFA leadership team and was based on input from key external stakeholders. The addition of the word "development" in the title of this document emphasizes the recognition of the NFA's need to continually develop its human capital and internal processes (i.e., standard operating procedures [SOPs]) to be capable of implementing the reforms under the legal approximation plan. The plan builds on prior reforms and covers all areas of NFA's activities, from control plans to administrative, human resources, and management plans. Additionally, the development of NFA's Quality Management System includes the systematic training needs assessment, which will benefit the NFA's ongoing institutional knowledge and learning. However, future assessments should consider the successful implementation of the IRDP.

Throughout 2016, the NFA facilitated or conducted numerous capacity building activities for not only the NFA, but also for other stakeholders, including the MoA, the LMA, the RS, the SRCA, other GoG representatives, NGOs, FBOs, and the general public. In addition to the various campaigns conducted within the course of the normal NFA activities (i.e., rabies awareness and vaccination campaign, brucellosis sampling and monitoring, etc.), in 2016, the NFA facilitated or conducted 25 trainings events, 18 workshops, 14 working groups, 5 public-private dialogue events (i.e., civic halls, roundtables), attendance at 3 conferences, and 3 study tours, resulting in improved technical capacity and institutional knowledge. Key topics, among others, included:

- Food safety requirements;
- Quality management;
- HACCP system implementation for FBOs;
- HACCP audits for NFA inspectors;
- National brucellosis strategy and control plan;
- Peer assessment on SPS and animal welfare legislation;
- Pesticide regulations and labeling;
- Animal identification and registration (AI&R);
- Microbiological and other contaminants;
- Internal audits;
- Accounting control of budgetary organizations.²²

Despite these achievements in technical capacity building and skills development at the NFA and the RS, there remains a shortage of qualified personnel to support not only the GoG's implementation of its food safety reforms and ongoing monitoring and control plans but also to provide food safety expertise within the private sector FBOs, laboratories, food safety consulting firms, and suppliers. In 2016, there were no additional programs established at Georgia's educational institutions for food safety-related disciplines. The number of graduates from existing programs are extremely limited. For example, the program at Tbilisi State University was established in 2010, which would have produced only 3 classes of graduates. The problems identified in EPF's 2015 assessment remain the same according to respondents, namely, that graduates do not have adequate skills and non-management salaries are still too low for the responsibilities of public service.²³

²² NFA capacity development activities are listed and described further in Annex 4.

²³ Europe Foundation, Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015.

Moreover, as turnover of NFA's non-management level staff is high, there is the risk that NFA will not be able to sustain its institutional knowledge as staff changes over time, which will require a more systematic approach for identifying training needs and providing training on a sustainable basis for current and new employees. Considering the low level of specialized educational programs in Georgia, all new employees will need intensive technical skills development after being recruited.

In response to this lack of formal education, the MoA established a training center in the second half of 2015; however, due to the availability of various donor projects providing their own training and capacity building events and activities for the MoA, the NFA, the RS, the LMA, and other GoG entities, the training center has not introduced any food safety programs. Instead, the training center has focused on providing training legal issues, business English, and financial management. In the future, the NFA should attempt to identify a sustainable way to introduce and conduct its own training programs. At the same time, the NFA should encourage donors not to conduct training programs independently, but rather in coordination with the MoA/NFA training center. For this to happen, the training center has to conduct qualified training needs assessments and, in coordination with donors, develop annual training/capacity building plans, so that it is possible for interested donors to plan ahead and to support needs-based capacity building or capacity development activities within the system.

In 2016, the RS enhanced the infrastructure development at its Border Inspection Points (BIP). Specifically, two of the RS's BIPs, Kartsakhi and Poti, were equipped with EU-compliant border inspection equipment and became operational in 2016. However, despite the modernization of the Kartsakhi BIP, there will be limited functionality for animal crossing due to the inadequacy of the corresponding Turkish BIP on the other side of the border.

Regarding the development of a third BIP in Adlia BIP, the RS is in the process of finishing construction of the facilities, but all necessary equipment has been procured. Finally, the Red Bridge BIP was negotiated with Azerbaijan in 2016, with construction expected to begin in February 2017 as part of the Eastern Partnership flagship initiative, which is a bilateral agreement with Azerbaijan to introduce EU-compliant equipment and processes for SPS and live animal crossings. This initiative is expected to be completed by the end of 2017. Similarly, the Sadakhlo BIP on the border with Armenia will be fully upgraded in 2017, and future assessments should track the progress of these two BIPs.

B. ACCUMULATION AND MANAGEMENT OF INFORMATION

The NFA's development of specific databases for the accumulation and management of food safety, FBOs, and animal health information have continued to improve in 2016. A key development was the commencement of the EUR 6 million, 6-year comprehensive National Animal Identification and Traceability (NAITS) project, funded by the SDC and ADA. This project builds on the NFA's prior AI&R pilot project and expands the scale of implementation. The NAITS project began in December 2016 and has been fully mobilized in the beginning of 2017.

The NFA's FBO registration software is complete, has been tested, and data from 20,310 FBOs²⁴ has been checked, verified, and uploaded into the system in 2016, which is an improvement over 2015, when only 17,000 FBOs were in the database and their data was not verified. Prior to October 2015, the FBO registration was managed through regional spreadsheets, which were thereafter consolidated into a centralized database. This database, coupled with the efforts of the NFA staff conducting door-to-door surveys, explains the improvement of data verification in 2016; however, there are no clear estimates of how many FBOs have not been verified and included in the NFA's database.

In September 2016, amended legislation now requires every FBO to update their information at the National Agency of Public Registry (NAPR) annually or the FBO's registration will be cancelled after one year if not compliant. The information from NAPR's database is being used to update NFA's FBO

²⁴ At the time of publication of this report, the total number of verified FBOs in the database was over 22,000.

database, which will ensure that the information will be more accurate on a continual basis from 2017 forward. However, this is still a manual process, and NFA's administrative burden would be substantially reduced if it could integrate databases with NAPR to have automatic updates. Even though this database has improved, it does not contain all data on all FBOs in Georgia nor does it provide any tools for traceability, so additional development will be required to address these gaps.

Still, the verification of a substantial number of FBOs has been a core element to enhance the NFA's monitoring and control plans, and future inspection and control planning processes should be based even more on a selection process that is sufficiently risk-based, which takes into all relevant risk characteristics of individual FBOs.²⁵ Future assessments should track the results of how the risk-based selection process is functioning.

In 2015, the NFA worked with the CBA-G program on the development of an intranet information management database, which was uploaded onto the NFA server and tested in July 2016. Given the delegation of additional responsibilities for inspections and control programs from the NFA Head Office to the Regional Offices (RO) that has already occurred and will continue in the future, providing information, forms, and submitting data via the intranet will greatly strengthen the NFA's internal communication and coordination capabilities, as well as its reporting processes. However, the intranet is not fully developed or rolled out across the regional offices. If this intranet system is not implemented fully across the NFA system, it will represent a risk to losing the NFA's institutional knowledge and memory due to the aforementioned high turnover of staff.

The Geographical Information System (GIS) and the Electronic Disease Surveillance System (EIDSS) are fully functional and the NFA Veterinary Department and LMA are systematically uploading data collected from brucellosis and foot and mouth (FMD) disease sero-monitoring into the EIDSS, which was updated in 2016 and is updated on a continual basis to improve functionality. EIDSS is also used by the NCDC and NFA to include GIS data mapping historical and current human and animal anthrax cases. Similarly, the GIS is linked to the NFA's meteorological stations and is currently being used to predict potential plant pest outbreaks and provide relevant information for timing the use of pesticides with most efficient and environmentally safe way. However, there has been no data provided to assess the efficacy of these systems. Therefore, future assessments will need to evaluate the efficacy of the GIS and EIDSS systems.

C. IMPROVED MANAGEMENT PROCESSES

In the beginning of 2016, the NFA introduced a new organizational structure, which merged the food inspection and monitoring functions into one department, which has not only improved coordination but also improved overall efficiency. Specifically, responsibilities for the five distinct types of "inspections" were previously divided between two groups, the food safety specialists and the inspectors. After the merging of these two functions and groups – and the retraining of the two groups – all five types were conducted together by the same personnel.²⁶

Still, a critical issue to ensure compliance by FBOs is the proper recording of all recommendations made during the inspections process, so future inspections can review individual FBO's success in implementing the recommendations. Respondents claimed that they often received verbal recommendations from inspectors that were not included in the final report. Additionally, the respondents claimed that some recommendations and even requirements made by inspectors were based on personal opinions rather than legal requirements. To prevent this, the NFA should train and instruct its inspectors in all regions to properly record all consultations, recommendations, and requirements, which should only be based on food safety regulations, ensuring accountability and continuity between future inspections. Moreover,

²⁵ The risk-based selection process is detailed further in the section on Monitoring and Control Activities: Food Safety.

²⁶ The five types of inspections are detailed further in the section on Monitoring and Control Activities: Food Safety.

NFA inspectors should use all available information, including the inspected firms' international food safety system certificates (e.g., ISO 22000) to develop their conclusions and recommendations.²⁷

In 2016, the NFA finalized several SOPs and action plans for many of its departments. At the end of 2016, the NFA's Quality Management Department were finalizing an additional 11 SOPs. The SOPs are critical to the NFA's expanding role in food safety control as they will establish clear procedure-based systems, which have the benefit of minimizing the risk of conflicts of interest and potential corrupt actions within the NFA's activities. It is important to note that, with the introduction of SOPs and training provided by the NFA and various donor programs, the organizational challenges highlighted by the EPF's 2015 assessment (i.e., conflicting and inconsistent approaches, problems in coordination and information exchange)²⁸ have improved. Additionally, although the NFA had expected to develop and introduce a performance-based employee assessment system in 2016, this process was postponed until after the SOPs for the NFA and MoA are finalized and implemented.

The SOP and manual development process also applied to the RS. In addition to four workshops with EU experts and other donor program trainings, the RS staff also developed draft manuals and SOPs in 2016 for veterinary (meat and live animals) and phytosanitary controls, which will be adopted in 2017, and followed by another manual and SOPs for food of non-animal origin later in 2017. Furthermore, in 2016, the RS continued the development of a border-control risk management system for the veterinary and phytosanitary fields, which is an initiative supported by the World Bank Group/IFC.

There is no data on how well the SOPs have been implemented; therefore, future assessments should attempt to assess the efficacy of the NFA and RS's recently introduced SOPs and employee assessment systems.

D. FOOD SAFETY RISK ASSESSMENT

Following international principles of Codex Alimentarius, OIE, IPPC, etc. in risk analysis, the risk assessment and risk management roles were separated between the MoA and NFA, and the Risk Assessment Division of the SRCA was established in 2014 to manage the risk assessment functions. The SRCA must utilize two types of data for conducting risk assessment for the food safety framework appropriately: occurrence data, which is provided by the NFA, and consumption data, for which the MLHS is responsible for collection. However, according to respondents, the most recent consumption data survey was conducted in 2001. Despite not having the sufficient consumption data, the SRCA used survey data from other countries to estimate exposures to food safety risks.

To resolve this issue in 2016, the SRCA has been active in expanding the technical skills of its staff. For example, two staff members from the SRCA attended a training seminar by the Federal Institute for Risk Assessment (BFR) and secured a three-month internship for the Head of the Risk Assessment Division with the BFR, which will take place in 2017. Another key development regarding international cooperation and coordination is that the contact point of EFSA has been officially transferred from the NFA to the SRCA due to its role in food safety risk assessment.

Additionally, the SRCA had been planning for a TAIEX mission of a Scientific Officer from the European Food Safety Authority (EFSA) since early 2015. The mission was finally agreed in late 2016, with the Scientific Officer from the Hellenic Food Authority visiting SRCA on January 16-20, 2017.²⁹ The goal of the mission was to analyze SRCA's methodologies and develop and apply new risk assessment methodologies for collecting and analyzing data. Upon concluding the mission, the Scientific Officer provided validation of the SRCA's past assessment methodologies, stating that "an example of a risk assessment report on trans-fats has been presented, where the overall procedure was closely matching the

²⁷ For more information on the prevalence of international food safety certifications, see the Food Safety Consulting Services section.

²⁸ Europe Foundation, Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015.

²⁹ While technically outside the timeframe of this assessment, this development of significant importance occurred prior to this report's publication and was included to provide a more complete representation of the current situation.

one followed by EU organisations”.³⁰ This validation provides clear credibility to the use of the SRCA’s “probable exposure” approach in estimating exposure risks during its risk assessment process, which strengthens the force of its conclusions. Still, the SRCA needs to obtain greater access to better data from the MLHS, RS, and other GoG entities for its risk assessment purposes.

One challenge that exists is the SRCA’s limited capacity to expand its role soon. With only six staff members in the SRCA’s Risk Assessment Division, its human and institutional capacities related to risk assessment are limited in scale. While the unit is trained and qualified to conduct risk assessments related to food safety, it does not have the same capacities to conduct risk assessments for veterinary and phytosanitary risks, for which it has been mandated to conduct in 2016 by the MoA. However, according to respondents there are other divisions within the SRCA that are currently working on phytosanitary risk assessment in a limited manner. Therefore, the SRCA should review the risk assessment capabilities throughout its departments to determine how to aggregate these functions to ensure efficacy in conducting veterinary and phytosanitary risk assessments appropriately.

Another challenge is in the lack of hazard-specific risk assessment policies at the MoA that are consistent with the requirements of EFSA and the Codex Alimentarius.³¹ The current generalized risk assessment policy does not contain the relevant info for the SRCA to conduct detailed risk assessment based on the MoA’s policy.

E. FOOD SAFETY LABORATORIES AND ACCREDITATION

In 2016, the GAC established a mandatory requirement for all accredited laboratories to (1) either conduct proficiency testing or inter-laboratory comparisons and (2) that these processes must produce “positive results” to maintain compliance with testing standards and processes. As a result, private laboratories have begun to participate in proficiency testing. Additionally, the GAC has expanded its activities with European Accreditation (EA), having passed its pre-evaluation audit in December 2015 and its final audit in November 2016, receiving confirmation of positive results from the EA. GAC management expects that a Bilateral or Multilateral Agreement on Mutual Recognition with the EA will be recommended in May 2017. If this occurs, then laboratory certificates from accredited laboratories in Georgia will be recognized in the EU and, therefore, globally. Although there will be a transition to not requiring additional testing after imports arrive from Georgia, this will eventually result in no additional laboratory tests after export, decreasing costs of exports and increasing their marketability. Given that this new regulation for mandatory proficiency testing or inter-laboratory comparisons is in its first year of implementation, the GoG should encourage and support all accredited laboratories to satisfy this new regulation.

In 2016, there were only “up to 14 private accredited laboratories”, which is less than observed in 2015 (“up to 20 such labs by 2015”).³² There is no indication as to whether this is due to the more strict accreditation requirements or to increased competition.

Still in Georgia, there are often situations where results from different laboratories do not agree, even when contracted by two different GoG entities (i.e., RS and NFA for imported food products). However, there are no established food safety reference laboratories that can serve as an ultimate authority on determining results for specific methodologies and scopes (i.e., specific methodologies for specific microbes). As such, the GoG should promote the establishment of one or multiple reference laboratories to focus on covering the majority of Georgia’s methodologies related to laboratory analyses for food safety, veterinary and phytosanitary purposes. In particular, the LMA should focus on developing a strategy to become a reference laboratory some key food safety, veterinary, and phytosanitary methodologies. Respondents have confirmed that there has been a need for food safety reference laboratories for many

³⁰ Koulouris, Stylianos, Expert Report Dea Expert Mission on Georgia, Ref: AGR IND/EXP 63660, January 23, 2017, p. 2.

³¹ Working Principles for Risk Analysis for Food Safety for Application by Governments, CAC/GL 62-2007, http://www.fao.org/input/download/standards/10751/CXG_062e.pdf.

³² Ibid.

years and, according to the MLHS, it is preparing legislation to make the Lugar Center available to serve as a food safety reference laboratory, particularly for microbiological and serological analyses.

Another critical issue is the ability of GeoSTM to cover calibration and measurement certification (electrical, mass and temperature measurements), which improved substantially in 2016. Specifically, GeoSTM introduced new infrastructure and laboratories in 2016, as well as a new mobile calibration unit to conduct calibration and measurement certifications throughout Georgia. Additionally, GeoSTM improved its capabilities related to the calibration of machinery and equipment (i.e., moisture content meters, refrigeration units, etc.). GeoSTM should be more proactive in marketing its services to FBOs to fulfil the NFA inspection requirements for calibration of instruments.

From 2014-16, the LMA added to its food and veterinary analysis capacities phytosanitary analysis. Specifically, the LMA had very limited capacity for phytosanitary analyses prior to the 2014, in which a new building was constructed for the LMA. In 2015, the phytosanitary laboratory was equipped, and during 2015-16, its staff was trained, and the laboratory is currently in use.

As was highlighted in EPF's 2015 assessment, the LMA continues to provide services to both public and private sector clients that are highly competitive with those offered by private laboratories.³³ Despite this ongoing competition from the LMA – which some respondents perceive to be unfair due to the LMA receiving funding from the GoG and from donor organizations – private laboratories accredited by the GAC participate in and win NFA and RS tenders for providing laboratory analyses for their control programs. However, some respondents claimed that the tenders paid very low compensation for services provided, which limits private sector capacity to invest in modern technologies and methodologies. Moreover, some procurement requests did not specify the methods to be used in the analyses, allowing firms providing cheaper and less accurate analysis methods to be included in their offers.

One of the key observations regarding competition between the LMA and private accredited laboratories is that the majority of laboratory service industry revenues are currently generated from public tenders. Respondents claimed that most private sector-sourced revenues come from testing from agriculture exports, which is limited in volume and scope. Respondents also stated that another reason there is not a higher volume of private sector laboratory analyses conducted is that the NFA has only an annual inspection requirements for FBOs, which is not frequent enough to properly control and guarantee the implementation of food safety systems within many FBOs. However, some FBOs have claimed that the NFA's requirement for laboratory analyses already has increased to be conducted on quarterly basis.

Therefore, the NFA should consider modifying its inspectors requiring FBOs to conduct laboratory analysis on a risk-based basis for determining an appropriate frequency (i.e., monthly, quarterly, annual) of conducting laboratory analysis for each type of FBO. While this would increase the compliance burden for FBOs, it would strengthen the potential for protecting the food safety system and consumer health, while also resulting in a much higher demand for private laboratory analyses from FBOs. The NFA's enforcement mechanism is already in place, as its inspectors already request laboratory results from FBOs during the inspection process, so no additional administrative cost or process is required.

F. PRIVATE SECTOR RESPONSES TO REFORMS

Observations from NFA Survey on FBOs

In December 2016, the NFA commissioned a survey of registered FBOs, of which about 90% of respondents stated that they believed the surveillance system has improved. Of those interviewed, all respondents stated that they were aware of the Codex Alimentarius, GMP/GHP, laboratory practices, or ISO 9001 requirements; however, only 60% stated that they were aware of with ISO 22000 requirements.

³³ Europe Foundation, Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015.

Similarly, approximately 67% stated that they were subject to at either quarterly or monthly NFA inspections.³⁴

According to survey results, the private sector is responding to regulatory requirements through additional employee training in food safety (60% of survey respondents), through fulfilling buyers and distributors food safety and quality requirements (63%), through implementing international food quality/safety management systems (30%), or through implementing their own food quality/safety management systems (33%).³⁵ Additionally, the survey results suggest that registered FBOs have invested in their food safety systems in 2015-2016, with 30% procuring food safety consulting services, 73% purchasing new machinery and/or equipment, and 53% upgrading their production facility and/or laboratory. However, the results also indicate a low level of international certification (10%).³⁶

However, while these results could be seen as initially encouraging, the survey did not address the trends developing within the unregistered segment of private sector FBOs, which, according to this assessment's expert interview and focus group respondents, makes up a significant percentage of the food supply, from milk and dairy producers to meat processors to outdoor vendors. For example, the percentage of unregistered, unregulated companies producing cheese is very large. While there is no reliable estimation of the unregistered food production segment, industry experts estimate that the number of cheese producers that are unregistered could be up to or even greater than 50%. Accounting for a greater population of FBOs than those that are currently registered, these rates must be adjusted downward.

Observations from Expert Interviews and Focus Groups

The reasons why FBOs pursue international certification should be considered, since this will impact the FBOs' level of compliance. Respondents claimed that the overwhelming trend for FBOs implementing HACCP system and/or obtaining certifications (e.g., FSSC 22000) is simply to be compliant with regulations, not because these certifications are perceived as connected to greater profitable economic opportunities. According to respondents, only a small minority have pursued these certifications as a response to market opportunities or to demonstrate the safety of their food products. Therefore, only a small number perceive any economic benefits related to implementing HACCP systems. Even more important, most FBOs do not understand the basic meaning of HACCP system to ensure the safety of their products for consumers' health.

During NFA inspections, many FBOs can prove traceability down to slaughterhouses for meat products, which is currently better than establishing traceability for dairy products, due in part to the prevalence of unregistered dairy companies, especially for cheese products. To ensure traceability, some FBOs (e.g., large grocery chains) are not buying from unregistered dairy producers at all. Respondents also stated that some shops, hotels, and eateries can only trace the food products they are buying to the wholesaler level due to the absence of origin data. Therefore, the credibility of the current traceability³⁷ system is in question, which represents a significant risk to consumer. The NFA should consider developing a method for tracing food products (e.g., electronic platform) to be used on a mass scale, particularly by small FBOs. This could be linked to the RS's transportation/sales electronic documentation system already in place.

Some FBOs have invested heavily in their food safety management systems and invested heavily in public awareness campaigns to promote safe food practices. Therefore, they desire to see the NFA implement a greater scope of control over more businesses, particularly over unregistered FBOs and small FBOs. Furthermore, these FBOs want the NFA to introduce more strict application of controls to ensure fair competition and the application of food safety management systems across all FBOs.

³⁴ Determination of Food Business Operators' Awareness Level and Assessment of the Activities of the National Food Agency in the Field of Food Safety, Psycho Project, 2016. No 2013 baseline data was available for comparison.

³⁵ Ibid.

³⁶ Ibid.

³⁷ For a full discussion of traceability issues, see the section "Traceability in the Food Supply Chain".

Food Safety Consulting Services

As in prior assessments, respondents claimed that the NFA's consulting services and detailed recommendations made during the inspection process tend to crowd out private sector firms that provide these services. Therefore, NFA should avoid conflicts of interest by providing information on requirements and not provide detailed recommendations that exceed legal requirements, which will allow the FBO to identify the solutions to comply with regulations and submit the solution to the NFA for approval. This will reduce the burden on NFA staff and provide opportunities for further development of private sector consulting services.

Regarding the development of these firms' capabilities, the variety and the level of sophistication of the services offered by private sector food safety consulting firms is improving, as is their capacity to conduct food safety audits for food safety certifications via their network of international certification firm partners (e.g., Lloyd's Register Quality Assurance Limited, TÜV SÜD, TÜV Hellas, Bureau Veritas). Specifically, consulting firms in Georgia can provide both training programs and auditing for FBOs related to food safety certifications in HACCP, ISO 22000, FSSC 22000, and GlobalGAP. These certifications and systems enable FBOs to show their customers and the NFA inspectors that they have a food safety management system in place, increasing their market access and reliability as a producer, processor, supplier, or distributor.

MONITORING AND CONTROL ACTIVITIES

A. FOOD SAFETY

Process Description

In 2016, the NFA's Food Safety Department included 100 food inspectors in 2016, exercising 5 types of official control:

- Inspection
- Documentary check
- Monitoring
- Sampling
- Surveillance

The department's main activities include official control of food safety, drafting of annual food safety control plan, risk management and communication based on risk assessment, HACCP audit, and issuing veterinary and health certificates. While the department has an official control plan of planned inspections and documentary checks, unplanned inspections and documentary checks may also be conducted based on the official controls revealing unsatisfactory results, notification from state authorities, notification from the RASFF, or claims from consumers. According to the annual plan for official food safety controls, the department implements a risk-based inspection and documentary check of FBOs by 11 regional offices. However, it is unclear whether these five activities are conducted simultaneously or as independent actions by NFA inspectors. If they are performed independently, then the NFA should consider consolidating all documentary checks and sampling activities within the inspection, monitoring, and surveillance functions.

Using its risk assessment software, the Tbilisi Regional Office (RO) can make its daily plan for inspections and update information about FBOs inspected within the database. A key achievement of this database is that the registered FBO database is updated daily by the inspectors of the Tbilisi RO and the Head Office with information of FBOs' activities and inspection reports. However, due to the lack of internet connections, the other ROs are not capable of administering their regional control plans or updating the database directly. Therefore, until this issue is resolved, the Head Office is directing the ROs to manage the regional control plans. As such, the NFA should resolve the internet connection problems quickly to allow the ROs to conduct their activities normally.

A key attribute of the risk management system is the utilization of twelve different score levels for various FBOs based on product category, company turnover, location, and history of controls. Through this system, the NFA can implement a risk-based selection process to identify FBOs for auditing purposes. This risk-based selection system directly addresses the State Auditor's Office recommendations from December 2015 that the NFA should conduct monitoring based on a risk-based approach and to elaborate a method for proportional coverage of districts.³⁸ This risk-based selection process should be linked to the RS's transportation/sales electronic documents to increase the data available for more targeted inspections based on actual products and volumes traded.

Results of Activities

In 2016, the department conducted 5,381 planned inspections (an increase of 42%), 613 unplanned inspections (down 13%), and 9,242 documentary checks (an increase of 13.8%), which all represent positive developments related to food quality and safety. As seen in the table below, the number of cases of non-compliance detected during analysis also decreased by 35-38% from 2015 to 2016.

³⁸ Performance Audit Report on Government Measures for Ensuring Food Safety, State Audit Office of Georgia, December 31, 2015.

Figure 3 - Summary of Control Statistics of Food Safety Department, 2015-16

Activity	2015	2016	Comparison	Impact
Number of Planned Inspections	3,794	5,381	+ 42%	Positive
Number of Unplanned Inspections	705	613	- 13%	Positive
Number of Documentary Checks During Monitoring	8,121	9,242	+13.8%	Positive
Non-Compliance Detected During Monitoring	1,217	794	-35%	Positive
Non-Compliance Detected During Laboratory Testing	782	479	-38%	Positive

The exact results of the monitoring activities, which included 3,262 samples tested in various accredited laboratories, of which 481 samples were non-compliant (14.7%).³⁹ A key observation is that the level of non-compliance has decreased from 2015, when it was 18.5%, which represents a positive development.

However, the results of inspections (i.e., details, quantity, quality of information) have not been publicized since 2014. Despite support from the GoG, donors, and civil society organizations, this process of publishing results is delayed due to the proper process of handling confidential details remaining unclear. Therefore, the MoA and NFA should encourage the MoESD and the Ministry of Justice to resolve this issue quickly to ensure the public is properly informed about FBOs that are under official control. Recommendations and examples from EU member states presented within the August 2016 EPF report, “Transparency of Food Safety and Labelling Control Results”, should be taken into account while determining the precise level of data to be made public regarding control results.

Within the NFA’s surveillance activities, it has destroyed a significant amount of food detected as non-compliant (including expired foods), including:

- Meat and meat products (22,049 kg);
- Beverages (3,655 liters);
- Eggs (8,529 unit);
- Unmarked meat (912 kg);
- Other food (64,983 kg).

In 2016, the NFA was successful in obtaining access to export honey to the EU. Specifically, Georgia has been included in the list of third countries authorized to export honey to the EU market. This is directly related to the improvement in monitoring results from honey samples analyzed from 2014-16:

- 2016: Out of 122 samples, 21 (17%) contained veterinary drug residues exceeding EU MRLs;
- 2015: Out of 104 samples, 20 (19%) contained veterinary drug residues exceeding EU MRLs;
- 2014: Out of 103 samples, 32 (31%) contained veterinary drug residues exceeding EU MRLs.

This trend demonstrates improvement in quality control in the honey production process on the part of the FBOs engaged in this sector. Although the monitoring of residues in honey was originally developed due to the EU’s import requirements, this improvement has also benefited the overall Georgian domestic market and, therefore, has improved the consumer health and safety regarding honey products sold in Georgia. However, the Maximum Residue Limits (MRL) are not always fully understood by all beekeepers, which causes unacceptable levels of non-complying samples. Therefore, the MoA and NFA should increase its effort to increase the beekeepers awareness of how veterinary medicines should be properly used.

Furthermore, the Food Safety Department of the NFA has been active in implementing the legislation approximated in 2015 and 2016. A residue monitoring plan was drafted in 2016 in accordance with the government decree No. 22 and considers the required parameters and food types elaborated within the decree, which came into force in January 2017. Furthermore, the NFA has conducted monitoring results

³⁹ Full details and analysis are included in Annex 5.

for veterinary drug residues and other contaminants in foods of animal origin and in animals according to government decrees No. 10, 499, 547, and 639,⁴⁰ which were adopted in 2016, with some having delays in enforcement. Specifically, No. 499 will fully come into force in January 1, 2019, and No. 547 will fully come into force on January 1, 2018. Furthermore, government decree No. 497, which governs mycotoxins in food and feed, will come into force on January 1, 2018.

Similarly, the governmental decree No. 623 on Approval of Technical regulation on the maximum pesticide residue levels in food/animal feed of non-animal origin was passed on December 29, 2016, which should improve the situation meaningfully. However, due to the difficulties related to the complexities of monitoring for pesticide residues, its full enforcement was delayed until January 1, 2020. The NFA and LMA should begin to gradually develop their capacities to be fully ready by 2020.

There remains the challenge that responsibility for inspecting food product composition compared with information on labels is not clearly mandated. Although the purpose of the 2012 Code is to protect human life and health, consumer interest, animal health and welfare, and plant health, and although the government decree No. 301 on Approval of Technical regulation on the Provision of Food Information to Consumers requires accuracy in labeling, legislation does not clearly indicate which organization is mandated to conduct this activity. This problem has been illustrated in the EPF's 2015 assessment, which detailed how diabetic and diet foods' compositions are not inspected to confirm their quality characteristics are accurately represented.⁴¹ However, there has been no significant development to counter this challenge in 2016.

Counterfeit and Fraudulent Food Products

To complement the NFA and RS control programs to ensure quality of food products generally, the Investigative Service (IS) of the MoF conducts investigations into food counterfeiting and consumer fraud related to food and beverage products. As outlined in the following table, the IS has initiated and investigated 35 and 37 criminal cases in 2015 and 2016, respectively, with all cases supervised by the Prosecutor's Office. Examples provide of such cases include the sale and distribution of counterfeit Georgian sparkling water and international alcohol brands, as well as fraudulent butter products.

Figure 4 - Food and Beverage Counterfeiting/Fraud Cases, 2015-16

Article in Criminal Code	Year	Criminal Cases Initiated	Individuals Investigated	Individuals Prosecuted		
				Bail	Imprisoned	Total
Article 197 (fraud)	2015	24	17	13	1	14
	2016	15	23	19	-	19
	Total	39	40	32	1	33
Article 197(1) (the illegal shipping or selling of counterfeit items)	2015	2	7	5	-	5
	2016	1	2	2	-	2
	Total	3	9	7	-	7
Article 198 (the manufacture, import, or sale of human life or health-threatening products)	2015	-	1	1	-	1
	2016	6	4	3	-	3
	Total	6	5	4	-	4
Article 200 (mislabeling - subject to excise goods without excise stamps, storage, sale or shipping [only alcohol-related cases])	2015	9	9	7	2	9
	2016	15	21	9	6	15
	Total	24	30	16	8	24

⁴⁰ Government decree No. 10 covers the use in stock farming of certain substances having a hormonal or thyrostatic action and of Beta-agonists; No. 499 covers performance of analytical methods and the interpretation of results for investigating certain substances and residues thereof in live animals and in food of animal origin; No. 547 covers the methods of sampling and analysis for the control of levels of microelements and contaminants in foodstuffs; and No. 639 covers pharmacologically active substances, their classification and maximum residue limits in foodstuffs of animal origin.

⁴¹ Europe Foundation, Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015.

The scale of the actual violation determines whether the case will be criminal or administrative in nature. Specifically, according to the IS, the Codex states that if an individual violation exceeds either 1,000 units or GEL 5,000, then it will be deemed a criminal case.

The IS's investigative activities are complimentary to NFA and RS inspections in that the IS has a wider mandate as a police force and, therefore, has investigated cases related to labeling and product composition as criminal cases. While the NFA inspections are risk-based and focuses naturally primarily on the safety of food products, there should be some attention paid to the potential existence of fraudulent products and consumer deception, and the IS should coordinate with the NFA and the RS to align activities regularly as the approximation process introduces new control requirements.

B. ANIMAL HEALTH

The Veterinary Department of the NFA maintains operations within 12 regions and 65 districts of Georgia. In all, the Department was responsible for the animal health of approximately 1,200,000 large ruminants, 1,000,000 small ruminants, 237,000 pigs, and 8,348,000 poultry in 2016. To accomplish this goal, the NFA has introduced and implemented a system of surveillance, serosurvey testing, vaccinations, and insecticide applications on both a risk-based and actual threat observed basis, as outlined in the table below:

Figure 5 - Active Veterinary Projects for Animal Health

Active Projects	Surveillance	Serosurvey	Vaccinations	Insecticides
FMD	●	●	●	
Rabies	●	●	●	
Anthrax	●		●	
Brucellosis	●	●	●	
Tuberculosis	●			
Avian Influenza	●			
Sheep and Goat Pox	●		●	
Lumpy Skin Disease	●		●	
African Swine Fever	●			
Paste des Petits Ruminants	●	●	●	
Crimean-Congo Hemorrhagic Fever	●			●

The success of these programs is demonstrated in the decrease of occurrences of common zoonotic diseases, as outlined in Annex 6. To enhance the coordination and transfer of information between veterinary experts, human health specialists, and laboratories, the NFA utilizes the Electronic Integrated Disease Surveillance System (EIDSS) to track specific occurrences of diseases and monitors for outbreaks.

In 2016, the NFA's Animal Identification and Registration (AI&R) system contained over 1.25 million cattle and 50,000 small ruminants; however, the removal of slaughtered or exported animals from the database was not completely properly. The NATTS project will build upon the insights gathered by the AI&R system and the network established throughout the country to enable a larger scope of registration and traceability functions. However, the NATTS project just began in December 2016 and will require additional time to become operational.⁴²

A positive improvement to support animal migration between winter and summer pastures without spreading diseases is the development of Biosafety Points (BSP) located on migration paths for both large and small ruminants to prevent the spread of diseases. These BSPs provide animal dipping and spraying, movement control, ear-tag and coverage control, as well as increasing public awareness of hygiene

⁴² For more information, see the section "Traceability in the Food Supply Chain".

standards. In 2016, four of these BSPs were constructed and began operating in 2016 and two more will be established in 2017.

However, respondents stated that the six BSPs will still not be sufficient to provide coverage for all animals migrated to seasonal pastures and do not cover all migration routes. Specifically, there are numerous large and small migration paths throughout Georgia. Animal migration occurs between regions, within regions, and within municipalities in both eastern and western Georgia. Therefore, there is a substantial proportion of these animals migrating that are not covered by the current and planned BSPs, and many additional BSPs should be introduced also by the municipalities. However, for movement within municipalities, no BSPs are required and simplified methods should be developed to control the spread of diseases.

Figure 6 - Examples of Biosafety Points in Georgia



While the control of the use of veterinary medicines and agricultural chemicals was very weak prior to 2016, the legislative framework has improved. As mentioned in the prior section on “Food Safety”, the governmental decree No. 639 on Approval of Technical Regulation for the Pharmacologically Active Substances, their Classification and Maximum Residue Levels in the Foodstuff of Animal Origin entered into force on July 1, 2016. This has resulted in the NFA directing their inspections of veterinary medicine retailers to withdraw any illegal medications from the market. However, there are no estimates or databases of what percentage of veterinary retailers have been inspected or the level of non-compliance.

As previously mentioned in the “Food Safety” section, the NFA has conducted monitoring results for veterinary drug residues and other contaminants in foods of animal origin and in animals, according to government decrees No. 10, 499, 547, and 639, which were adopted in 2016, with some having delays in enforcement. Specifically, No. 499 will fully come into force in January 1, 2019, and No. 547 will fully come into force on January 1, 2018. Furthermore, government decree No. 497, which governs mycotoxins in food and feed, will come into force on January 1, 2018.

Similarly, as also outlined in the “Food Safety” section, the governmental decree No. 623 on Approval of Technical regulation on the maximum pesticide residue levels in food/animal feed of non-animal origin was passed in 2016, but its full enforcement was delayed until January 1, 2020, when NFA and LMA will have full capacity for conducting sampling and testing.

C. PLANT HEALTH

The Phytosanitary Department of the NFA operates within 64 district offices and consists of 70 phytosanitary specialists throughout Georgia.⁴³ The main activities of this department include:

- Organizing the plant protection preventive measures, supervision and control;

⁴³ Additionally, phytosanitary control at the border is administered by the RS.

- Maintaining a state register of pesticides and fertilizers;
- Conducting phytosanitary monitoring;
- Issuing and controlling phytosanitary and re-export phytosanitary certificates;
- Fulfilling quarantine activities and protection of the Georgian territory from the introduction and spread of pests;
- Phytosanitary diagnosis of agricultural lands, forecasting the spread of pests, and developing measures to counter pests.

A key development is that the NFA became a member of European and Mediterranean Plant Protection Organization (EPPO) in 2016, which has benefited in the development of its phytosanitary control program for 2017 during the second half of 2016. The NFA is also conducting the approximation process related to phytosanitary issues, developing SOPs, and creating a register of phytosanitary FBOs. Subsequently, the FAO launched a Technical Cooperation Program Facility (TCPF) project to conduct a Phytosanitary Capacity Evaluation of the phytosanitary system of Georgia.

The NFA established 14 meteorological stations in 2014, which are used to forecast pest and fungus levels. In 2016, the FAO purchased an additional 10 meteorological stations to be placed in Kakheti, which will be used to forecast pest and fungus levels for cereals, grape wine crops, and vegetables crops. Results of this initiative will be evaluated in 2017.

During 2016, the NFA provided pest protection across Georgia for a total of 26,285 ha for the following pests:

- Locusts- 23,615 ha;
- Fall webworm – 1,580 ha;
- Box tree moth – 490 ha;
- Gypsy moth – 600 ha.

Despite the absence of an integrated control program for the Phytosanitary Department, the NFA was able to take 1,972 samples in 2016 and detected 3 quarantine pests:

- *Synchytrium endobioticum*- 16 cases;
- *Ralstonia solanacearum* -1 case;
- *Erwinia amylovora*- 1 case (first time).

A major initiative that the NFA began in November 2016 is the combat of the Brown Marmorated Stink Bug (BMSB) infestation. Recognizing the potential substantial losses to Georgia's farmers in quality and quantity of production (particularly for hazelnut growers), the NFA convened an internally directed site visit and inspection of BMSB experts from the US, Italy, Switzerland, and South Africa to study the BMSB infestation and develop a strategy to combat the infestation. This program will continue in 2017, with a national training program for all NFA Head Office and RO phytosanitary staff and the MoA's Information and Consultation Centers (ICCs).

Other key activities conducted by the NFA include pesticide registration and pesticide testing. At the end of 2016, there were 731 pesticides and 638 fertilizers registered. Based on the harmonization of the EU Regulation 1107/2009 that concerns plant protection products in the market, the NFA conducted a new project to reevaluate the pesticides in the market, which resulted in the removal of 50 pesticides from the state register of allowed pesticides to ensure protection for human health and the environment. Similarly, as part of the NFA's program on Plant Protection and Phytosanitary Reliability, the NFA conducted 150 inspections of retail sales points, where they took 296 samples for laboratory analysis, which resulted in 18 distinct kinds of nonconformity have been found. However, there are no estimates or databases of what percentage of pesticide retailers have been inspected.

D. BORDER INSPECTION POINTS

The RS is responsible for designing and implementing control plans for food safety, plant protection, and animal health at the borders of Georgia, which includes the RS conducting documentary checks, physical identification, and sampling with laboratory analyses. Upon completion of these analyses, consignment data is sent real-time to the NFA to alert the need for inspections. The results of the 2016 food safety controls are outlined in the tables below:

Figure 7 - Actions Taken for Veterinary and Phytosanitary Control, and GMO Sampling, 2015-16

Year	Actions Taken, Vet Control	Actions Taken, Phyto Control	Vet samples	Phyto samples	Live GMO samples	Food GMO samples
2015	8,266	13,197	1,464	826	610	363
2016	8,712	14,835	1,917	1479	625	565

As indicated in Figure 7, actions taken for veterinary and phytosanitary control, as well as GMO sampling, have increased significantly in 2016, representing a positive development, particularly for veterinary and phytosanitary. Specifically, actions for veterinary and phytosanitary control increased by 5.4% and 12.4%, respectively, in 2016. Similarly, sampling for veterinary and phytosanitary control increased by 30.9% and 79.1% in 2016. Live and food GMO samples conducted increased by 2.5% and 55.6%, respectively, from 2015 to 2016.

Figure 8 - Veterinary and Phytosanitary Violations Detected, 2015-16

Year	Veterinary – discovered violations	Phytosanitary – Discovered violations	GMO confirmed in Food/animal food
2015	63	48	29
2016	111	55	40

Furthermore, as demonstrated by Figure 8, the number of detected violations for veterinary, phytosanitary, and GMO control increased by 76.2%, 14.6%, and 37.9%, respectively, for the same period. The percentage of phytosanitary samples resulting in violations demonstrated only a slight increase, from 0.36% to 0.37%. GMO samples with violations actually decreased from 8.0% to 7.1% in 2016. The percentage of samples taken that detected violations has increased from 0.8% to 1.3% for veterinary samples. Veterinary issues need more attention since the detected violations increased significantly in 2016 and future assessments should determine whether a trend is developing or not.

Another important process-related issue is the difference in practices between the RS and the NFA in recording (i.e., batch v. consignment) which food products require additional NFA laboratory analysis. Specifically, the RS records an entire assignment as non-compliant instead of a specific batch within the consignment; therefore, the NFA must pull all the products from the entire consignment from the market, if possible, and test them instead of simply testing the smaller number of products from a specific batch. The NFA and RS should adopt the TRACES (Trade Control and Expert System), which would solve the trade control and inspection differences. According to the NFA, this is expected to be introduced in 2017.

E. WATER SUPPLY SYSTEMS

The safety and quality of Georgia's water supply system is essential to avoid foodborne and waterborne diseases and ensure consumer health. At the same time, the water supply systems contribute to the safety of food products, as water is used throughout the process of producing, processing, selling, transporting, and delivering food products to consumers. Despite the efforts of FBOs to implement and ensure food safety systems, the final products can be contaminated during handling or processing if waterborne diseases are present. Therefore, the subject of the quality of water supply systems is included here.

The monitoring and control of Georgia's water supply has two layers, local control daily (as determined by governmental decree No. 58 in 2014) and national control through NFA inspections intermittently throughout the year (as determined by the governmental decree No. 92 in 2016, which is reassessed annually). All aspects of Georgia's water supply systems are tested, from reservoirs to the water taps delivering water to consumers.

While the NFA provides external auditing of water supply systems, water companies and municipalities are responsible for daily testing. The NFA has also collaborated with the Ministry of Environment for many years to test for heavy metals. Georgian Water and Power (a private firm) distributes water to consumers in Tbilisi, Rustavi, Mtskheta, and Gardabani. Similarly, the remainder of Georgia is supplied by the United Water Supply Company (UWSC, under the MoIRD), excluding Adjara and Sachkhere, which are supplied by municipal water supply systems. However, in some areas, no water supply systems are present, and consumers depend on local water sources (i.e., wells). These areas are outside official control and represent a potential risk to the food safety system.

Prior EPF assessments recommended that, given its powers, the MoIRD should assume responsibility to coordinate all central, municipal, and private sector organizations to ensure a quality water supply, responsibility for the coordination of water supply system. However, it appears that water supply distributors, like UWSC, operate independently. For example, UWSC and other distributors have invested heavily, and is continuing to invest, in their own physical and technical capacities over the past several years. Specifically, UWSC has a substantial 4-year project pipeline of over GEL 1 billion for water system rehabilitation and waste treatment centers.

Providing drinking water for 35-40% of the total population of Georgia, particularly in rural areas, the UWSC hosts a network of 51 water safety laboratories across Georgia. In addition to the central laboratory in Tbilisi, UWSC also has 7 regional laboratories and laboratories in 43 of its 50 service centers (86%), representing an improvement to its internal capacity to conduct water safety testing. UWSC claimed that its testing processes have improved dramatically, such that, in 2015-2016, there were only 7 negative results in Georgian schools serviced by UWSC. Additionally, only 691 out of 44,354 tests (1.56%) of headworks, ground water, and drinking water conducted in 2016 contained deviations from the standard, and there were no critical violations in 2016. For drinking water testing within the distribution network across Georgia, only 1.3% of all tests resulted in deviations from the norm.

The operational challenges that UWSC faces due to the needed rehabilitation are compounded by the lack of a constant supply of water in some areas, introducing additional complexity to maintaining control over water quality. For its future sustainability, UWSC recognizes the need for additional technologies and equipment as part of UWSC's ongoing system rehabilitation and for additional technical advisory and staff trainings to ensure company personnel have the required technical skills (i.e., laboratory analysis, engineering) to be sustainable.

In 2016, the NFA conducted 462 samples of the water supply systems operating in Georgia (water tests were conducted at headworks, the ground water, drinking water in the distribution networks and in response to consumer complaints), resulting in a 47% of samples deviated from the WHO standards established by Georgian law.⁴⁴ Additionally, the number of samples containing E. Coli was 18% in 2016. Both of these indicators were approximately the same as in previous years, but should be followed up by future assessments. It is essential to note that the total bacteria and E. Coli figures are only indicators of the hygienic state of the water supply and do not necessarily represent imminent threats to human health. Although they are unacceptably high, NFA reported that no pathogenic microorganisms were detected in 2016 or in 2015.

It is also important to note that the 90% of NFA's negative results are from microbiological contamination from rural villages. However, urban areas have better water supply systems and lower occurrence of deviations from the norm, as also highlighted by UWSC's low contamination statistics. The GoG should

⁴⁴ Law of Georgia on Public Health No. 5069.

identify a strategy to determine the discrepancies between the NFA sampling results and those from water distributors and create action plans in cases of confirmed non-compliances. Additionally, the municipalities governing areas where no water supply system is present should develop a control and monitoring program for these areas.

F. HUMAN HEALTH AND CONTROL PLAN

Improvements in the Sanitary-Hygienic Normative Framework

The EPF 2015 assessment highlighted shortcomings in the sanitary-hygienic normative framework, which has been updated in 2016 through the introduction of several key pieces of legislation introduced through the approximation process, including:

- Decree No. 510 of the GoG on approval of the nutritional value of the food and health associated application, approved November 17, 2016 (enters into force on March 1, 2018);
- Decree No. 508 of the GoG on Approval of Technical Regulation on the addition of vitamins, minerals and of certain other substances to foods approved November 1, 2016 (enters into force on August 1, 2017);
- Decree No. 301 of the GoG on Approval of Technical regulation on the Provision of Food Information to Consumers approved July 1, 2016 (enters into force on September 1, 2018).

This is in addition to the sanitary-hygienic legislation that was passed in 2015 and entered into force in 2016:

- Decree No. 581 of the GoG on Approval of Technical Regulation for Food Microbiological Criteria approved November 10, 2015 (entered into force on July 1, 2016);
- Decree No. 567 of the GoG setting maximum levels for certain contaminants in foodstuffs approved November 9, 2015 (entered into force on July 1, 2016);
- Decree No. 639 of the GoG on Approval of Technical Regulation for the Pharmacologically Active Substances, their Classification and Maximum Residue Levels in the Foodstuff of Animal Origin approved December 18, 2015 (entered into force on July 1, 2016).

The NCDC completed the draft of the National Strategy on Antimicrobial Resistance and submitted it to the MLHS for approval in 2016.⁴⁵ Furthermore, the NCDC, supported by the CDC, has continued to develop and implement several programs, including the Sentinel System, to monitor for foodborne and waterborne disease outbreaks.

Outbreak Detection, Identification, and Investigation

In 2016, the NCDC detected and identified 23 foodborne and waterborne disease outbreaks in Georgia that affect 269 patients. Of these, 13 were hospitalized and 1 death occurred due to the disease outbreak. This has decreased from 2015, when 40 outbreaks affecting 205 patients were detecting, resulting in the hospitalization of 61 patients. Per established SOPs, the NCDC input the data into the EIDSS system, providing real-time updates to the NFA, who also uses the system. The NFA proceeded to conduct investigations for each of these outbreaks to determine the source or cause, providing confirmation of the investigative results to the NCDC for each recorded outbreak; however, the number of outbreaks with the source confirmed by the NFA remains very low.

Given the consumption of the contaminated food or water, the incubation period of the disease, and the time required to analyze samples at the hospitals, it should be expected that sometimes the original source of contamination is no longer available (e.g., the food was eaten/sold before NFA investigated). Still, there should be a higher confirmation rate for identifying the source of outbreaks.

⁴⁵ The National Antimicrobial Strategy was actually approved by government decree No. 29 on January 11, 2017.

Even in cases where the food was available for testing by the NFA, there were still differences in testing results due to the differing methodologies employed by the NCDC's laboratory and the laboratory(ies) procured by the NFA. To eliminate these discrepancies, the NFA should place stricter, more technical requirements (related to methodologies to be utilized) in its procurement requests for laboratory services related to outbreak investigations to ensure reliable analysis results.

Occurrence of Foodborne Diseases

The NCDC tracks the occurrence of both foodborne and waterborne diseases on a national basis throughout the year. Over the prior 10-year period, the number of self-reported diagnoses of presumed food poisoning has increased from 2,035 in 2007 to 34,288 in 2016, which is also a 6.5% increase over 2015. Likewise, the total number of self-reported diagnoses of diarrhea of infectious origin has similarly increased over the 10-year period.

This dramatic increase in reported cases seem to be the resulting effect of better reporting via the national health system. However, respondents also indicated that there is an increasing global trend in the occurrence of diarrhea-related illnesses. Another reason for the dramatic increase in the reporting figures cited by respondents is the increasing availability of government healthcare programs for Georgian citizens. Specifically, reporting has increased along with the introduction of the elderly and child healthcare programs in 2010, as well as the universal healthcare expansion in 2013, which can be seen in an analysis of the statistics, as there are significant increases in reported cases in 2011 and 2014.⁴⁶ As reported in prior EPF annual assessments, "individual cases (except for botulism and shigellosis) are diagnosed as food/waterborne diseases based on the information received from patients. This information cannot be verified; nor can the real causes of these diseases be identified."⁴⁷

However, the number of self-reported diagnoses of diarrhea of infectious origin showed a decrease of 10.9% from 2015 to 2016. Similarly, the total number of cases of foodborne and waterborne diseases decreased in 2016 by 2.7%.⁴⁸ These decreases suggest that the healthcare and food safety systems are improving, but future assessments should determine whether a trend is developing or not. Furthermore, the NCDC and NFA should identify the underlying causes of these improved rates.

G. TRACEABILITY IN THE FOOD SUPPLY CHAIN

The issue of traceability of all food products "from farm to fork" is a fundamental principle of establishing and maintaining a functioning food safety system and of providing the framework to easily monitor for, and quickly react to, food safety and human health problems. Traceability is most relevant to protecting consumer health by providing greater visibility into the food supply chain. In case of outbreaks, traceability ensures that the GoG and FBOs can respond quickly and accurately to identify the sources of the outbreaks and to investigate further, if necessary. As the food safety system is developing further in Georgia, establishing traceability will build credibility and confidence among not only local consumers in Georgia, but also the many international visitors that arrive in Georgia every year for business or tourism.

Despite the numerous reforms and systemic changes to improve control over the food supply chain in Georgia since 2012, the traceability system does not fully function properly in Georgia. For imported food products, the traceability system is well established up to the actual border, but movement within Georgia is not traced well, particularly for meats, fruits, and vegetables. Specifically, although at the retail point, the foreign producer, and the local importer are known, the internal transportation, storage, and distribution channels are not.

⁴⁶ For further information and statistics related to foodborne illnesses, see Annex 7.

⁴⁷ Europe Foundation, Food Safety Regulation in Georgia: Assessment of the Government's Reform Efforts in 2015.

⁴⁸ For further information and statistics related to foodborne illnesses, see Annex 7.

For domestically produced food products, some aspects of the traceability systems do work; however, the ability to trace origin to specific producers or processors is generally not possible. For animal origin food products, traceability systems for meat products have been implemented more than for dairy products. Still, the origin of meat products can be traced only to the slaughterhouses, not to individual producers. On the other hand, the origin of dairy products can only be established to the wholesalers, in most cases, rather than to the individual producer or processor. For unregistered companies outside official control, traceability is generally not possible to establish.

For non-animal origin food products produced in Georgia, traceability is like that for dairy products, in that fruits and vegetables can only be traced to wholesalers in most cases. For breads and cereals, it is generally not possible to establish traceability.

There have been some positive developments related to traceability in 2016. A key development was the commencement of the EUR 6 million, 6-year comprehensive National Animal Identification and Traceability (NAITS) project. This project builds on the NFA's prior Animal Identification and Registration (AI&R) pilot project and expands the scale of implementation to be nationwide. By identifying and registering animals, and monitoring their movements and health status, traceability for foods of animal origin can be established and consumer health and food safety can be protected.

Additionally, new legislation has been developed to regulate traceability. Specifically, the new meat labeling government decree No. 118 came into force on March 9, 2016, establishing the requirement for labeling meat, which is a key component of traceability. Additionally, the government decree No. 546 established identification requirements for pigs as of December 13, 2016, which completed the already existing legislation on registration of bovines and small ruminants.

Overall, the regulatory system is improving, the GoG is open to change, the FBOs are slowly improving their practices, but traceability still represents a major vulnerability to the quality of food, due to their unknown origin, handling, and distribution processes. Therefore, traceability should be a focus for future assessments. Moreover, the NFA should consider developing a mechanism for tracing food products (e.g., electronic platform) to be used on a mass scale, particularly by small FBOs. If possible, this new mechanism could be linked to the RS's transportation/sales electronic documentation system already in place to enhance traceability for both imported and domestically produced food products.

H. PUBLIC AWARENESS AMONG CONSUMERS

Observations from Surveys and Focus Groups

Based on a comparison of the results of two cross-sectional surveys of 1,000 individuals conducted by Psycho Project for the NFA in December 2013 and December 2016, consumer appreciation of Georgian agro-food safety has increased by the end of 2016, though not sufficiently. The overall awareness of the GoG's food safety control has increased from 38% to 54%. Similarly, while only 9% of respondents knew what the NFA did in 2013, 64% of 2016 respondents stated that they know that the NFA is the food safety control body in Georgia. On the other hand, only 10% of the 2016 survey respondents claimed that they were aware of the CSOs working in the food safety sector.⁴⁹

Similarly, focus group respondents indicated that the overall public awareness, particularly outside of Tbilisi in the regions, is still very low. Therefore, the NFA should introduce additional PR efforts and programs to raise public awareness on what the different GoG entities are doing to establish and enforce a fully functioning food safety system in Georgia.

The findings from both the NFA surveys and the focus groups indicate that the public's level of awareness is not deep and that a full awareness of the many entities active in the food safety system has not been

⁴⁹ Sources include the 2013 and 2016 "Assessment of Proactive and Reactive Activities of Main Areas of the National Food Agency and Outcomes Thereof" report, Psycho Project.

achieved. Therefore, the NFA should partner more closely with CSOs on improving public awareness of food safety reforms and initiatives.

Figure 9 - Selected Quotes from the Focus Group Participants

I support the government's efforts to increase control and monitoring. However, it is an unfair situation when the GoG cannot control open markets or smaller restaurants that have faulty business practices. All in all, implementation of food safety standards requires huge capital investments and it is increasing our costs, and those who don't maintain lower costs.

[Male, FBO, Batumi]

I as a customer should not worry about the safety or quality of food I am buying. It is solely government's obligation/responsibility to ensure that only safe food crosses our border or is sold in grocery stores or restaurants. **[Female, Control Group, Ozurgeti]**

We get monitored every month and it is always a different man. However, I know about the companies that do not get monitored at all.

[Male, FBO, Tbilisi]

I do appreciate that the Government is improving its control. But it looks like they do it in a hurry and there are errors in the legislation/technical regulations.

[Female, FBO, Batumi]

With each monitoring, we get different requirements and it is confusing. When I think that I comply with the standards there is always something new that is coming up.

[Male, FBO, Tbilisi]

We have approached the NFA to get a recommendation on safe food and places where we could take the kids. But the feedback was not sufficient.

[Female, Consumer, Ozurgeti]

The service is very fast on the border and is improving every year.

[Male, Importer, Tbilisi]

It is a very complicated process to import goods. We do not have any information on new requirements. Nobody contacts us when something is happening. There are no trainings to get information.

[Male, Importer, Batumi]

The local NFA is very friendly, we regularly attend the trainings organized either by the NFA or with its participation.

[Man, Batumi]

Response to Consumer Complaints

As indicated by interview and focus group respondents, the level of public awareness of the existence of the NFA Hotline to submit complaints is very low. Respondents claimed that none of the participants had known or even heard of the NFA prior to their “incident” and that all participants had to conduct their own research to find out which responsible agency to contact. Therefore, the NFA should introduce additional PR efforts and programs to increase the public’s awareness of exactly how and when to submit complaints related to food safety requirements.

According to the NFA, 100% of complaints are recorded and receive an NFA response as an official letter when the complainant had expressed his/her wish to receive such response, and, if the letter cannot be delivered, the response is confirmed via telephone. However, focus group participants that had submitted complaints indicated the NFA responded very slowly, with one respondent citing that it took the NFA up to a month to mobilize its staff to inspect the relevant FBO. While all respondents stated that the NFA did investigate their complaint, none were provided written feedback of results. These results demonstrate that the NFA is taking action when receiving complaints; however, the NFA should be more responsive in following-up with consumers.

FINDINGS, OBSERVATIONS AND RECOMMENDATIONS

A. FINDINGS AND OBSERVATIONS

Ministry of Agriculture

- In 2014, the legal approximation plan was agreed between the EU and the GoG; however, this plan was later revised in 2015 and, although informally agreed upon with DG Sante, it was officially approved. Even though this version had not been officially approved, the GoG followed its implementation guidelines and benchmarks to ensure the timely adoption of reforms. This version was not officially approved in 2016; however, it eventually was approved and signed by the MoA and DG Sante in March 2017 and became an annex to the AA.
- In 2016, the MoA completed 100% of its commitment to approximate 25 normative acts, with 13 related to food safety, 9 related to veterinary standards, and 3 related to phytosanitary. In addition, the MoA finalized the approximation of the outstanding legal instruments from the 2015 approximation plan. This is a key achievement, since 55 legal instruments have been approximated and the MoA is on schedule. However, many had transition periods of 1-2 years before full enforcement of all articles and some have been delayed until 2020. For some of the acts, transition periods are required to ensure successful implementation, though these transition periods are understood by many stakeholders as a delay rather than as an extended period for compliance to begin immediately with penalties applied after the transition period. Similarly, these long periods jeopardize the credibility of the new legislation and the whole process, while leaving consumer safety at risk.
- The MoA announces expected changes via legal approximation on its website and requests input from external stakeholders. However, many respondents complained that this is not enough to ensure that the consumers and business sector's opinions and needs are fully integrated into the process and that the actual harmonization process is not easily understood. Additionally, respondents claimed that posting draft legislation on the MoA's website is not an efficient way to communicate and they would prefer to either be involved in the preparation of the draft prior to online submission for comments.
- In response to a of formal education, the MoA established a training center in the second half of 2015; however, due to the availability of various donor projects providing their own training and capacity building events and activities for the MoA, the NFA, the RS, the LMA, and other GoG entities, the training center has not introduced any food safety programs.
- Responsibility for inspecting food product composition compared with information on labels is not clearly mandated. Although the government decree No. 301 on Approval of Technical regulation on the Provision of Food Information to Consumers requires accuracy in labeling, legislation does not clearly indicate which organization is mandated to conduct this activity.

National Food Agency of the Ministry of Agriculture

Public Engagement and Awareness

- Based on a comparison of the results of two representational, cross-sectional surveys of 1,000 individuals conducted by Psycho Project for the NFA in December 2013 and December 2016, consumer appreciation of Georgian agro-food safety has increased by the end of 2016, though not sufficiently.
- As indicated by interview and focus group respondents, the level of public awareness of the existence of the NFA Hotline to submit complaints is very low. Respondents claimed that none of the participants had known or even heard of the NFA prior to their "incident" and that all participants had to conduct their own research to find out which responsible agency to contact.
- According to the NFA, 100% of complaints are recorded and receive an NFA response as an official letter when the complainant had expressed his/her wish to receive such response, and, if

the letter cannot be delivered, the response is confirmed via telephone. However, focus group participants that had submitted complaints indicated the NFA responded very slowly, with one respondent citing that it took the NFA up to a month to mobilize its staff to inspect the relevant FBO. While all respondents stated that the NFA did investigate their complaint, none were provided written feedback of results.

- The NFA hosts a “civic hall” public forum where the GoG can advise and collect input from these stakeholders directly through public-private dialogue. While these civic halls were created by the NFA in collaboration with CSOs to ensure the necessary input and involvement from the private sector and CSOs, it is clear that this initiative needs further improvements. There were only three events held in 2016, which is not frequent enough, and, according to interviewed experts, the meetings were not well organized and were too short to adequately cover the material discussed.
- A 2016 survey demonstrated substantial growth among FBOs related to the implementation of food safety systems, system-related investments, and greater compliance. However, the survey did not address the trends developing within the unregistered segment of private sector FBOs, which, according to this assessment’s expert interview and focus group respondents, makes up a substantial percentage of the food supply, from milk and dairy producers to meat processors to outdoor vendors.
- Respondents claimed that the overwhelming trend for FBOs implementing HACCP system and/or obtaining certifications (e.g., FSSC 22000) is simply to be compliant with regulations, not because these certifications are perceived as connected to greater profitable economic opportunities. According to respondents, only a small minority have pursued these certifications as a response to market opportunities or to demonstrate the safety of their food products. Therefore, only a small number perceive any economic benefits related to implementing HACCP systems. Even more important, most FBOs do not understand the basic meaning of HACCP system to ensure the safety of their products for consumers’ health.

Implications of Legal Approximation

- In 2016, new legislation increased the NFA’s ability to enforce food safety regulations. While the NFA’s ability to fine and suspend the operations of registered FBOs for non-compliance has been maintained and unchanged; however, the Law of Georgia No. 5568 on Amendments to Law No. 6155 on Code of Food/Feed Safety, Veterinary and Plant Protection strengthened enforcement of unregistered and/or unrecognized FBOs to include suspension of business activities in addition to the ability to levy fines.
- Fines for unregistered or unrecognized FBOs are set by legislation and remained at GEL 500.00, which is inadequate to deter non-compliance for most commercial operations, based on FBOs receiving fines once per year on average. As indicated by respondents in interviews and focus groups, the low cost of fines, coupled with a low level of enforcement, creates a disincentive for compliance. In other words, the fines themselves and the probability of receiving a fine are expected to cost less than the cost of compliance as a registered FBO. Still, the fines are equally applied to FBOs of all sizes, when respondents indicated that a revenue-based penalty system would be more appropriate and fair.
- The presence of unregistered FBOs in the market was cited by many interview and focus group respondents as negatively affecting competition and damaging the sales revenues of those compliant, registered companies since the unregistered firms can charge lower prices for their products since they do not invest in appropriate infrastructure, equipment, and food safety systems. This has resulted, over the years, in the presence of many outdoor vendors operating without permits for outdoor trade, which are issued and monitored by local municipalities. In combination with excessive inspections for some FBOs, this creates an incentive for companies to deregister in some cases. For example, some respondents indicated that some FBOs are visited

by NFA inspectors up to six times per year without tangible results. This risk should be further addressed in future assessments.

- As outlined in the EPF 2015 assessment, there is a lack of control for small FBOs that have less than GEL 200,000 of annual revenues until 2020, even though registration of these businesses as FBOs is required. In 2016, this situation remained the same, and the NFA did not have the authority to inspect these FBOs. This continues to represent a risk to consumer safety, since a high portion of Georgia's food is produced by these small FBOs.
- Enforcement of HACCP requirements for relevant FBOs improved in 2016. Fines and suspension of activities were applied for non-compliance for both registered and recognized FBOs. While not all have HACCP systems in place, the number of dairy processors and slaughterhouses recognized and HACCP approved has increased. However, there is no data available about the number or percentage of these FBOs that have implemented HACCP.
- Provisional approval was issued to 489 FBOs and final approval to 42 FBOs in 2016. This is a significant increase (+232.7%) over 2015, when only 147 received provisional approval. Despite this increase in compliance, it still only represents a small portion of the market. For example, although there is no reliable data for the unregistered food production segment, industry experts estimate that the number of cheese producers that are unregistered could be up to or even greater than 50%. In fact, there is no data to confirm what percentage of food in Georgia is sold under food safety controls.
- Compliance related to the requirement that "all domestic animals intended for sale be killed at slaughterhouses" has improved. According to GeoStat, the monthly percentage of animals slaughtered under veterinary control has increased from 27% to 46% for cattle, 19% to 45% for pigs, 1% to 8% for sheep, 2% to 8% for poultry. Furthermore, assuming that a substantial number of animals are slaughtered for home consumption, it is possible to estimate that only 50% of meat sold has been slaughtered under veterinary control in 2016. This represents an ongoing risk to consumer health and should be addressed in future assessments.

Institutional Development

- The NFA had developed and implemented its "Institutional Reform and Development Plan, 2017-2019" in 2016, which was prepared in collaboration with the NFA leadership team and was based on input from key external stakeholders.
- Throughout 2016, the NFA facilitated or conducted numerous capacity building activities for not only the NFA, but also for other stakeholders, including the MoA, the LMA, the RS, the SRCA, other GoG representatives, NGOs, FBOs, and the general public. In addition to the various campaigns conducted within the course of the normal NFA activities (i.e., rabies awareness and vaccination campaign, brucellosis sampling and monitoring, etc.), in 2016, the NFA facilitated or conducted 25 trainings events, 18 workshops, 14 working groups, 5 public-private dialogue events, attendance at 3 conferences, and 3 study tours.
- In 2016, the NFA finalized several SOPs and action plans for its departments. At the end of 2016, the NFA's Quality Management Department were finalizing an additional 11 SOPs.

Training and Human Resources

- There remains a shortage of qualified personnel to support not only the GoG's implementation of its food safety reforms and ongoing monitoring and control plans but also to provide food safety expertise within the private sector FBOs, laboratories, food safety consulting firms, and suppliers.
- As turnover of NFA's non-management level staff is high, there is the risk that NFA will not be able to sustain its institutional knowledge as staff changes over time, which will require a more

systematic approach for identifying training needs and providing training on a sustainable basis for current and new employees. Considering the low level of specialized educational programs in Georgia, all new employees will need intensive technical skills development after being recruited.

- The GoG has conducted many legal approximations already, and will continue to do so. With new inspection and control responsibilities and an increased scope of control added annually, particularly in 2020, the NFA will continue to require additional qualified personnel with the appropriate training and skills.

Information Database Management

- A key development was the commencement of the EUR 6 million, 6-year comprehensive National Animal Identification and Traceability (NAITS) project, funded by the SDC and ADA. This project builds on the NFA's prior AI&R pilot project and expands the scale of implementation. The NAITS project began in December 2016 and full mobilization is expected in the beginning of 2017.
- The NFA's FBO registration software is complete, has been tested, and data from 20,310 FBOs has been checked, verified, and uploaded into the system in 2016, which is an improvement over 2015, when only 17,000 FBOs were in the database and their data was not verified. However, there are no clear estimates of how many FBOs do exist and operate without having not been verified and included in the NFA's database.
- Since September 2016, the National Agency of Public Registry (NAPR) has required every FBO to update their information annually. The information from NAPR's database is being used to update NFA's FBO database; however, this is still a manual process, and NFA's administrative burden would be substantially reduced if it could integrate databases with NAPR to have automatic updates. Even though this database has improved, it does not contain all data on all FBOs in Georgia nor does it provide any tools for traceability, so additional development will be required.
- The verification of many FBOs has been a core prerequisite to conducting the NFA's monitoring and control plans properly, and future inspection and control planning processes will result in a selection process that is sufficiently risk-based, which takes into all relevant risk characteristics of individual FBOs. Future assessments should track the results of how the risk-based selection process is functioning.
- A key achievement of this database is that the registered FBO database is updated daily by the inspectors of the Tbilisi RO and the Head Office with information of FBOs' activities and inspection reports. However, due to the lack of internet connections, the other ROs are not capable of administering their regional control plans or updating the database directly. Therefore, until this issue is resolved, the Head Office is directing the ROs to manage the regional control plans.
- NFA's intranet system is not implemented fully across its network, which represents a risk to losing the NFA's institutional knowledge and memory due to the aforementioned high turnover of staff.
- The Geographical Information System (GIS) and the Electronic Disease Surveillance System (EIDSS) are fully functional and the NFA Veterinary Department and LMA are systematically inputting data collected from brucellosis and foot and mouth (FMD) disease sero-monitoring into the EIDSS, which was updated in 2016 and is updated on a continual basis to improve functionality. However, there has been no data provided to assess the efficacy of these systems.

Food Safety Control

- In 2016, the NFA's Food Safety Department conducted 5,381 planned inspections (an increase of 42%), 613 unplanned inspections (down 13%), and 9,242 documentary checks (an increase of 13.8%), which all represent positive developments related to food quality and safety.

- To ensure compliance by FBOs, the proper recording of all recommendations made during the inspections process is necessary, so future inspections can review individual FBO's success in implementing the recommendations. Respondents claimed that they often received verbal recommendations from inspectors that were not included in the final report. Additionally, the respondents claimed that some recommendations and even requirements made by inspectors were based on personal opinions rather than legal requirements.
- Despite support from the GoG, donors, and civil society organizations, this process of publishing results is delayed due to the proper process of handling confidential details remaining unclear.
- Quality control in the honey production process on the part of the FBOs engaged in this sector has improved. Although the monitoring of residues in honey was originally developed due to the EU's import requirements, this improvement has also benefited the overall Georgian domestic market and, therefore, has improved the consumer health and safety regarding honey products sold in Georgia. However, the Maximum Residue Limits (MRL) are not always fully understood by all beekeepers, which is one of the major reasons for unacceptable high levels of non-complying samples.

Veterinary Control

- The NFA's Veterinary Department has introduced and implemented a system of surveillance, serosurvey testing, vaccinations, and insecticide applications on both a risk-based and actual threat observed basis for 11 different diseases.
- A positive development to support animal migration from winter to summer pastures without spreading diseases is the development of Biosafety Points (BSP) located on migration paths for both large and small ruminants. These BSPs provide animal dipping and spraying, movement control, ear-tag and coverage control, as well as increasing public awareness of hygiene standards. However, respondents stated that the six BSPs will still not be sufficient to provide coverage for all animals migrated to seasonal pastures and do not cover all migration routes.
- While the control of the use of veterinary medicines and agricultural chemicals was very weak prior to 2016, the legislative framework has improved. This has resulted in the NFA directing their inspections of veterinary medicine retailers to withdraw any illegal medications from the market. However, there are no estimates or databases of what percentage of veterinary retailers have been inspected or the level of non-compliance.

Phytosanitary Control

- A key development is that the NFA became a member of European and Mediterranean Plant Protection Organization (EPPO) in 2016, which has benefited in the development of its phytosanitary control program for 2017 during the second half of 2016. The NFA is also conducting the approximation process related to phytosanitary issues, developing SOPs, and creating a register of phytosanitary FBOs. Subsequently, the FAO launched a Technical Cooperation Program Facility (TCPF) project to conduct a Phytosanitary Capacity Evaluation of the phytosanitary system of Georgia.
- The NFA established 14 meteorological stations in 2014, which are used to forecast pest and fungus levels. In 2016, the FAO purchased an additional 10 meteorological stations to be placed in Kakheti, which will be used to forecast pest and fungus levels for cereals, grape wine crops, and vegetables crops. Results of this initiative will be evaluated in 2017.
- At the end of 2016, there were 731 pesticides and 638 fertilizers registered. Based on the harmonization of the EU Regulation 1107/2009 that concerns plant protection products in the market, the NFA conducted a new project to reevaluate the pesticides in the market, which resulted

in the removal of 50 pesticides from the state register of allowed pesticides. The level of success for market control should be considered for future assessments.

- A major initiative that the NFA began in November 2016 is the combat of the Brown Marmorated Stink Bug (BMSB) infestation. This program will continue in 2017, with a national training program for all NFA Head Office and RO phytosanitary staff and the MoA's Information and Consultation Centers (ICCs).

Water Supply Systems

- In 2016, the NFA conducted 462 samples of the water supply systems, resulting in a 47% of samples deviated from the WHO standards established by Georgian law. Additionally, the number of samples containing E. Coli was 18% in 2016. Both of these indicators were approximately the same as in previous years, but should be followed up by future assessments. Although these figures are unacceptably high, it is essential to note that these results are only indicators of the hygienic state of the water supply and no imminent threats to human health, as NFA reported that no pathogenic microorganisms were detected in 2016 or in 2015.
- 90% of NFA's negative results are from microbiological contamination from rural villages. However, urban areas have better water supply systems and lower occurrence of deviations from the norm, as also highlighted by UWSC's low contamination statistics.

Science and Research Center of Agriculture of the Ministry of Agriculture

- The SRCA of the MoA has been active in conducting numerous food risk assessments since it was created in 2014. Within its scope of activities, the SRCA has identified specific risks within the Georgian food safety system and has recommended specific policy actions that have resulted in the introduction of two new regulations in 2016.
- The SRCA had been planning for a TAIEX mission of a Scientific Officer from the European Food Safety Authority (EFSA) since early 2015. The mission was finally agreed in late 2016, with the Scientific Officer from the Hellenic Food Authority visiting SRCA on January 16-20, 2017. Upon concluding the mission, the Scientific Officer provided validation of the SRCA's past assessment methodologies, stating that "an example of a risk assessment report on trans-fats has been presented, where the overall procedure was closely matching the one followed by EU organisations". This validation provides clear credibility to the use of the SRCA's "probable exposure" approach in estimating exposure risks during its risk assessment process, which strengthens the force of its conclusions.
- The SRCA has been active in expanding the technical skills of its staff through trainings and internships with the Germany Federal Institute for Risk Assessment (BFR).
- With only six staff members in the SRCA's Risk Assessment Division, its human and institutional capacities related to risk assessment are limited in scale. While the unit is trained and qualified to conduct risk assessments related to food safety, it does not have the same capacities to conduct risk assessments for veterinary and phytosanitary risks, for which it has been mandated to conduct in 2016 by the MoA.
- A continuing challenge is in the lack of hazard-specific risk assessment policies at the MoA that are consistent with the requirements of EFSA and the Codex Alimentarius. The current generalized risk assessment policy does not contain the relevant info for the SRCA to conduct detailed risk assessment based on the MoA's policy.

Laboratory of the Ministry of Agriculture

- Despite ongoing competition from the LMA – which some respondents perceive to be unfair due to the LMA receiving funding from the GoG and from donor organizations – private laboratories accredited by the GAC participate in and win NFA and RS tenders for providing laboratory analyses for control programs. However, some respondents claimed that the tenders paid very low compensation for services provided, which limits private sector capacity to invest in modern technologies and methodologies. Moreover, some procurement requests did not specify the methods to be used in the analyses, allowing firms providing cheaper and less accurate analysis methods to be included in their offers.
- Respondents claimed that the majority of laboratory service industry revenues are currently generated from public tenders and that most private sector-sourced revenues come from testing from agriculture exports, which is limited in volume and scope. Respondents also stated that another reason there is not a higher volume of private sector laboratory analyses conducted is that the NFA has only an annual inspection requirements for FBOs, which is not frequent enough to properly control and guarantee the implementation of food safety systems within many FBOs. However, some FBOs have claimed that the NFA's requirement for laboratory analyses already has increased to be conducted on quarterly basis.

Revenue Service of the Ministry of Finance

- In 2016, the RS enhanced the infrastructure development at its Border Inspection Points (BIP). Specifically, two of the RS's BIPs, Kartsakhi and Poti, were equipped with EU-compliant border inspection equipment and became operational in 2016. However, despite the modernization of the Kartsakhi BIP, there will be limited functionality for animal crossing due to the inadequacy of the corresponding Turkish BIP on the other side of the border. The RS is in the process of finishing construction of the facilities for the Adlia BIP, but all necessary equipment has been procured. Regarding the development of a third BIP in Adlia BIP, the RS is in the process of finishing construction of the facilities, but all necessary equipment has been procured. The Red Bridge BIP was negotiated with Azerbaijan in 2016, with construction expected to begin in February 2017 as part of the Eastern Partnership flagship initiative, which is a bilateral agreement with Azerbaijan to introduce EU-compliant equipment and processes for SPS and live animal crossings. The Sadakhlo BIP on the border with Armenia will be fully upgraded in 2017, and future assessments should track its progress.
- The RS staff developed draft manuals and SOPs in 2016 for veterinary (meat and live animals) and phytosanitary controls, which will be adopted later in 2017, and followed by another manual and SOPs for foods of non-animal origin later in 2017.
- The RS's actions taken for veterinary and phytosanitary control, as well as GMO sampling, have increased significantly in 2016, representing a positive development, particularly for veterinary and phytosanitary.
- The number of detected violations for veterinary, phytosanitary, and GMO control increased from 2015 to 2016. Veterinary issues in particular need more attention since the detected violations increased significantly in 2016.
- Since 2016, the RS has also been involved in ongoing development of a risk management system for the veterinary and phytosanitary fields, which is an initiative supported by the World Bank Group/IFC.
- A process-related issue is the difference in practices between the RS and the NFA in recording (i.e., batch v. consignment) which food products require additional NFA laboratory analysis. Specifically, the RS records an entire assignment as non-compliant instead of a specific batch within the consignment; therefore, the NFA must pull all the products from the entire consignment from the market, if possible, and test them instead of simply testing the smaller number of products from a specific batch.

Investigative Service of the Ministry of Finance

- The IS conducts investigations into food counterfeiting and consumer fraud related to food and beverage products, resulting in 35 and 37 criminal cases being initiated and investigated in 2015 and 2016, respectively, with all cases supervised by the Prosecutor's Office.

Ministry of Economy and Sustainable Development

- In 2016, the MoESD's state agency, GeoSTM, also adopted 13 international or EU standards related to proficiency testing and food safety analysis. The standards adopted include eleven food product standards under Technical Committee 3 (Food Product Standards) related primarily to microbiological testing. Additionally, the list of standards adopted includes two conformity assessment standards under Technical Committee 2 (Quality Management and Certification) related to proficiency testing and drafting normative documents.
- In 2016, the Georgian Accreditation Center (GAC) established a mandatory requirement for all accredited laboratories to (1) either conduct proficiency testing or inter-laboratory comparisons and (2) that these processes must produce "positive results" to maintain compliance with testing standards and processes. As a result, private laboratories have begun to conduct proficiency testing.
- The GAC has expanded its activities with European Accreditation (EA), having passed its pre-evaluation audit in December 2015 and its final audit in November 2016, receiving confirmation of positive results from the EA. GAC management expects that a Bilateral or Multilateral Agreement with the EA will be recommended in May 2017.
- GeoSTM introduced new infrastructure and laboratories in 2016, as well as a new mobile calibration unit to conduct calibration and measurement certifications throughout Georgia. Additionally, GeoSTM improved its capabilities related to the calibration of machinery and equipment (i.e., moisture content meters, refrigeration units, etc.).

Ministry of Labor, Health, and Social Affairs

- In 2016, the overall sanitary-hygienic normative framework was updated through the introduction of several key pieces of legislation introduced through the approximation process.

National Center for Disease Control

- The NCDC completed the draft of the National Strategy on Antimicrobial Resistance and submitted it to the MLHS for approval in 2016.
- In 2016, the NCDC detected and identified 23 foodborne and waterborne disease outbreaks in Georgia that affect 269 patients. Of these, 13 were hospitalized and 1 death occurred due to the disease outbreak. This has decreased from 2015, when 40 outbreaks affecting 205 patients were detected, resulting in the hospitalization of 61 patients. Per established SOPs, the NCDC input the data into the EIDSS system, providing real-time updates to the NFA, who also uses the system. The NFA proceeded to conduct investigations for each of these outbreaks to determine the source or cause, providing confirmation of the investigative results to the NCDC for each recorded outbreak; however, the number of outbreaks with the source confirmed by the NFA remains very low.
- It should be expected that sometimes the original source of contamination is no longer available; however, there should be a higher confirmation rate for identifying the source of outbreaks.
- Even in cases where the food was available for testing by the NFA, there were still differences in testing results due to the differing methodologies employed by the NCDC's laboratory and the

laboratory(ies) procured by the NFA. Ministry of Infrastructure and Regional Development (and United Water Supply Company (UWSC)).

- Prior EPF assessments recommended that, given its powers, the MoIRD should assume responsibility to coordinate all central, municipal, and private sector organizations to ensure a quality water supply, responsibility for the coordination of water supply system. However, it appears that water supply distributors, like UWSC, operate independently. For example, UWSC and other distributors have invested heavily, and is continuing to invest, in their own physical and technical capacities over the past several years. Specifically, UWSC has a substantial 4-year project pipeline of over GEL 1 billion for water system rehabilitation and waste treatment centers.
- UWSC hosts a network of 51 water safety laboratories across Georgia. In addition to the central laboratory in Tbilisi, UWSC also has 7 regional laboratories and laboratories in 43 of its 50 service centers (86%), representing an improvement to its internal capacity to conduct water safety testing.
- UWSC claimed that water quality has improved dramatically over the past several years. However, based on their own data, there were no significant improvements between 2015 and 2016. In 2016, only 691 out of 44,354 tests (1.56%) of headworks, ground water, and drinking water conducted contained deviations from the standard, which was the same rate as in 2015. Still, UWSC claimed that there were only 7 negative results in Georgian schools serviced by UWSC from 2015-2016.
- The operational challenges that UWSC faces due to the needed rehabilitation are compounded by the lack of a constant supply of water in some areas, introducing additional complexity to maintaining control over water quality. For its future sustainability, UWSC recognizes the need for additional technologies and equipment as part of UWSC's ongoing system rehabilitation and for additional technical advisory and staff trainings to ensure company personnel have the required technical skills (i.e., laboratory analysis, engineering) to be sustainable.

B. RECOMMENDATIONS

Ministry of Agriculture

- To enhance the participation of the private sector and civil society, the MoA should consider posting three documents online within the public-private dialogue input collection process of legal approximation: (1) the Georgian draft legislation, (2) the English language version of the EU regulation, and (3) the translated version of the EU regulation.
- As the MoA introduces new reforms, it must continue to be systematic regarding the introduction of new inspection and control requirements to eliminate any remaining gaps and to ensure compliance by Food Business Operators (FBOs).
- With the administrative and control requirements of new legal approximation, the MoA/NFA should begin a proactive campaign to recruit, train, and develop an expanded workforce both in the Head Office and in the ROs.
- The MoA should attempt to identify a sustainable way to introduce and conduct its own food safety training programs. At the same time, the NFA should encourage donors not to conduct training programs independently, but rather in coordination with the MoA training center.
- The MoA/NFA HR Department could establish three separate training tracks in addition to the current training programs at APMA in financial accounting and English.
 - The first track could focus on providing orientation training and skills updates to new employees assuming specific roles and responsibilities within the Food Safety, Veterinary, and Phytosanitary Departments.
 - The second track could provide ongoing training for current employees to improve the technical skills related to their position as well as provide advanced technical and management training for staff to advance in their career and assume additional responsibilities within NFA.
 - The third track could be responsive to developing trends and provide new trainings for all relevant NFA staff due to (1) the identification and control requirements of new pests and

diseases over time and (2) the requirements of the new Georgia regulations resulting from the legal harmonization process and on an ongoing basis.

National Food Agency of the Ministry of Agriculture

Public Engagement and Awareness

- Based on the survey responses indicating that 90% of individuals were unaware of CSOs operating in the food safety field or their activities, the NFA should better coordinate with CSOs to accomplish common goals by providing food safety-related trainings or by conducting joint public awareness activities.
- Similarly, focus group respondents indicated that the overall public awareness, particularly outside of Tbilisi in the regions, is still very low; therefore, the NFA should introduce additional PR efforts and programs to educate the public on what the different GoG entities are doing to establish and enforce a fully functioning food safety system in Georgia.
- The NFA should introduce additional PR efforts and programs to increase the public's awareness of exactly how and when to submit complaints related to food safety requirements.
- The NFA should introduce more targeted (specific topics) and more frequent civic halls to ensure public input is fully participatory and inclusive of all relevant stakeholders' perspectives.
- The NFA should consider adoption of the recommendations resulting from EPF's September 2016 retreat to improve the civic hall structure and processes, which proposed the establishment of five working groups under the civic hall structure to meet regularly, including (1) food safety information provision, (2) food safety import regulations, (3) food safety implementation, (4) transparency in control results, and (5) civil society awareness of food safety.
- The NFA, with other GoG ministries, could implement a more efficient method to inform all registered FBOs on new food safety requirements.
- The MoA and NFA should increase its effort to increase the beekeepers awareness of how veterinary medicines should be properly used.

Control Issues

- The NFA should consider opportunities to accelerate control over small FBOs. This will have the additional benefit of preventing growing FBOs from developing multiple companies to avoid crossing over this threshold, which has been cited by several respondents as a current activity in the market.
- To prepare for the increased burden of future control over small FBOs, to ensure compliance with currently controlled FBOs, and to identify violators related to financial reporting, the NFA should develop an electronic traceability platform for FBOs to trace their suppliers via personal or company ID numbers, linked to the RS's transportation/sales electronic documentation system already in place. This platform would also help eliminate unfair competition from unregistered FBOs.
- The NFA should avoid conflicts of interest by providing information on requirements and not provide detailed recommendations that exceed legal requirements, which will allow the FBO to identify the solutions to comply with regulations and submit the solution to the NFA for approval. This will reduce the burden on NFA staff and provide opportunities for further development of private sector consulting services.
- The NFA should consider modifying its inspection interval requirements to focus on a risk-based basis for determining an appropriate frequency (i.e., monthly, quarterly, annual) of conducting laboratory analysis for each type of FBO. While this would increase the compliance burden for FBOs, it would strengthen the potential for protecting the food safety system and consumer

health, while also resulting in a much higher demand for private laboratory analyses from FBOs. The NFA's enforcement mechanism is already in place, as its inspectors already request laboratory results from FBOs during the inspection process, so no additional administrative cost or process is required.

- The NFA should resolve the internet connection problems quickly to allow the ROs to conduct their activities normally.
- To eliminate these discrepancies in NCDC and NFA's testing results, the NFA should place stricter, more technical requirements (related to methodologies to be utilized) in its procurement requests for laboratory services related to outbreak investigations to ensure reliable analysis results.
- Despite the numerous reforms and systemic changes to improve control over the food supply chain in Georgia since 2012, the traceability system does not fully function properly in Georgia. However, there have been some positive developments related to traceability in 2016.

Training and Human Resources

- It is necessary to provide enhanced training for regional staff to ensure high quality inspections are conducted uniformly throughout Georgia. These trainings could include practical trainings and experience in conducting real inspections alongside more experienced staff.
- The NFA should train and instruct its inspectors in all regions to properly record all consultations, recommendations, and requirements, which should only be based on food safety regulations, ensuring accountability and continuity between future inspections. Moreover, NFA inspectors should use all available information, including the inspected firms' international food safety system certificates (e.g., ISO 22000) to develop their conclusions and recommendations.
- The MoA and NFA should encourage the MoESD and the Ministry of Justice to resolve this issue quickly to ensure the public is properly informed about FBOs that are under official control. Recommendations and examples from EU member states presented within the August 2016 EPF report, "Transparency of Food Safety and Labelling Control Results", should be taken into account while determining the precise level of data to be made public.
- As the NFA intranet is not fully developed or rolled out across the regions, the NFA should finalize its development and implemented fully across the NFA system, which would require the designation of clear responsibilities within the NFA for maintenance and content updates.

Water Supply Systems

- The GoG should identify a strategy to determine the discrepancies between the NFA sampling results and those from water distributors and create action plans in cases of confirmed non-compliances. Additionally, the municipalities governing areas where no water supply system is present should develop a control and monitoring program for these areas.

Science and Research Center of Agriculture of the Ministry of Agriculture

- The SRCA needs to obtain greater access to better data from the MLHS, RS, and other GoG entities for its risk assessment purposes.
- The SRCA should review the risk assessment capabilities throughout its departments to determine how to aggregate these functions to ensure efficacy in conducting veterinary and phytosanitary risk assessments appropriately.

Revenue Service of the Ministry of Finance

- The NFA and RS should adopt the TRACES (Trade Control and Expert System), which would solve the trade control and inspection differences. According to the NFA, this is expected to be introduced in 2017. TRACES is the EC's key multilingual online management tool for all sanitary requirements on intra-EU trade and importation of food, feed, plants, animals, etc. from third countries. The key benefit is that the entire certification process and linked procedures are digitized and traceability of consignments and batches are improved. Although no additional legislation is needed for commencing to use TRACES, the 2017 approximation plan includes approximation with 6 EU legal instruments related to TRACES.

Investigative Service of the Ministry of Finance

- Given the IS's activities related to investigating and prosecuting violations related to counterfeiting, fraud, and products that threaten human health, the IS should coordinate with the NFA and the RS to align activities regularly as the legal approximation process introduces new control requirements each year.

Ministry of Economy and Sustainable Development

- Given that the GAC's new regulation for mandatory proficiency testing or inter-laboratory comparisons is in its first year of implementation, the GoG should encourage and support all accredited laboratories to satisfy this new regulation.
- The GoG should promote the establishment of one or multiple reference laboratories to focus on jointly covering the majority of Georgia's methodologies related to laboratory analyses for food safety, veterinary and phytosanitary.
- GeoSTM should be more proactive in marketing its calibration and measurement certification services to FBOs to fulfil the NFA inspection requirements for calibration of instruments.

Ministry of Labor, Health, and Social Affairs

- The MLHS should finalize approval for the National Strategy on Antimicrobial Resistance and incorporate the strategy into its annual action plans.

Ministry of Infrastructure and Regional Development (and United Water Supply Company)

- The MoIRD and UWSC should identify a strategy to determine the discrepancies between the NFA sampling results and those from water distributors and create action plans in cases of confirmed non-compliances.
- The MoIRD should coordinate with local municipality leaders to ensure the provision of safe water and organize the necessary testing to monitor quality in areas where distribution networks are not present.

Parliament of Georgia

- The Parliament, with the MoA, should introduce changes to the Georgian law "Code on Food/Feed Safety, Veterinary and Plant Protection" to adjust the level of penalties for food safety violations to make them relevant to ensure compliance according to the seriousness of the violation(s) and the production capacity of the respective FBO.
- Parliament, with the MoA, should initiate changes to legislation to accelerate the inclusion within NFA control of small FBOs that generate less than GEL 200,000 in annual revenues prior to 2020.

Annex 1: Legislation Approximated in 2016

	Policy Area	EU Legislation	Legislation of Georgia
1	Food Safety	Commission <u>Decision 2002/657/EC</u> of 12 August 2002 implementing Council Directive 96/23/EC concerning the performance of analytical methods and the interpretation of results.	Decree No. 499 of the Government of Georgia of November 8, 2016, Tbilisi-technical regulation-on approval of the rule concerning the performance of analytical methods and the interpretation of results for investigating certain substances and residues thereof in live animals and in food of animal origin. https://matsne.gov.ge/ka/document/view/3429851
2	Food Safety	Commission <u>Decision 2006/677/EC</u> of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules.	Law of Georgia on Public Internal Financial Control https://matsne.gov.ge/ka/document/view/91618
3	Food Safety	<u>Regulation (EC) No 396/2005</u> of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC.	Resolution No. 623 of the Government of Georgia of December 29, 2016, Technical regulation-on approval of maximum residue levels of pesticides in or on food and feed of plant and animal origin. https://matsne.gov.ge/ka/document/view/3525095
4	Food Safety	<u>Regulation (EU) No 1169/2011</u> of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004 Text with EEA relevance.	Resolution No. 301 of the Government of Georgia of July 1, 2016, Technical regulation –on the provision of food information to consumers https://matsne.gov.ge/ka/document/view/3328780
5	Food Safety	<u>Regulation (EC) No 1924/2006</u> of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods.	Resolution No. 510 of the Government of Georgia of November 17, 2016, on approval of nutrition and health claims made on foods. https://matsne.gov.ge/ka/document/view/3437399
6	Food Safety	Commission Regulation (EU) No 1047/2012 of 8 November 2012 amending Regulation (EC) No 1924/2006 with regard to the list of nutrition claims.	Resolution No. 510 of the Government of Georgia of November 17, 2016, on approval of nutrition and health claims made on foods. https://matsne.gov.ge/ka/document/view/3437399
7	Food Safety	Commission Implementing Decision 2013/63 of 24 January 2013, adopting guidelines for the implementation of specific conditions for health claims laid down in Article 10 of Regulation (EC) No 1924/2006 of the European Parliament and of the Council.	Resolution No. 510 of the Government of Georgia of November 17, 2016, Tbilisi on approval of nutrition and health claims made on foods. https://matsne.gov.ge/ka/document/view/3437399
8	Food Safety	<u>Regulation (EC) No 1333/2008</u> of the European Parliament and of the Council of 16 December 2008 on food additives.	Resolution No. 585 of the Government of Georgia of December 23, 2016, technical regulation- on approval of food additives. https://matsne.gov.ge/ka/document/view/3505326
9	Food Safety	<u>Regulation (EC) No 1925/2006</u> of the European Parliament and of the Council of 20 December 2006 on the addition of vitamins and minerals and of certain other substances to foods.	Resolution No. 508 of the Government of Georgia of November 17, 2016, Tbilisi-technical regulation-on the addition of vitamins and minerals and of certain other substances to foods. https://matsne.gov.ge/ka/document/view/3436946

	Policy Area	EU Legislation	Legislation of Georgia
10	Food Safety	Commission Regulation (EC) No 1170/2009 of 30 November 2009 amending Directive 2002/46/EC of the European Parliament and of Council and Regulation (EC) No 1925/2006 of the European Parliament and of the Council as regards the lists of vitamin and minerals and their forms that can be added to foods, including food supplements.	Resolution No. 508 of the Government of Georgia of November 17, 2016, Tbilisi-technical regulation-on the addition of vitamins and minerals and of certain other substances to foods. https://matsne.gov.ge/ka/document/view/3436946
11	Food Safety	Commission Regulation (EU) No 37/2010 of 22 December 2009 on pharmacologically active substances and their classification regarding maximum residue limits in foodstuffs of animal origin.	Resolution No. 639 of the Government of Georgia of December 18, 2015, Tbilisi-technical regulation on pharmacologically active substances, their classification and maximum residue limits in foodstuffs of animal origin. https://matsne.gov.ge/ka/document/view/3109878
12	Food Safety	Commission Regulation (EC) No 401/2006 of 23 February 2006 laying down the methods of sampling and analysis for the official control of the levels of mycotoxins in foodstuffs.	Resolution No. 497 of the Government of Georgia of November 17, 2016, Tbilisi on approval of the methods of sampling and analysis for the determination of mycotoxins in foodstuffs. https://matsne.gov.ge/ka/document/view/3429104
13	Food Safety	Commission Regulation (EC) No 333/2007 of 28 March 2007 laying down the methods of sampling and analysis for the official control of the levels of lead, cadmium, mercury, inorganic tin, 3-MCPD and benzo(a)pyrene in foodstuffs.	Resolution No. 547 of the Government of Georgia of December 13, 2016, Tbilisi on the methods of sampling and analysis for the control of levels of microelements and contaminants in foodstuffs. https://matsne.gov.ge/ka/document/view/3465163
14	Veterinary	Council Directive 2008/71/EC of 15 July 2008 on the identification and registration of pigs.	Resolution No. 548 of the Government of Georgia of December 13, 2016 on the identification and registration of pigs and on the registration of their holdings. https://matsne.gov.ge/ka/document/view/3471454
15	Veterinary	Council Directive 2005/94/EC of 20 December 2005 on Community measures for the control of avian influenza and repealing Directive 92/40/EEC.	Resolution No. 597 of the government of Georgia of December 27, 2016, making amendment in the decree No. 348 of the government of Georgia of July 14 th , 2015 Tbilisi on approval of the procedures of exercising preventive and quarantine measures against animal communicable diseases. https://matsne.gov.ge/ka/document/view/3512608
16	Veterinary	Commission Regulation (EC) No 616/2009 of 13 July 2009 implementing Council Directive 2005/94/EC as regards the approval of poultry compartments and other captive birds compartments with respect to avian influenza and additional preventive biosecurity measures in such compartments.	Resolution No. 597 of the government of Georgia of December 27, 2016, making amendment in the decree No. 348 of the government of Georgia of July 14 th , 2015 Tbilisi on approval of the procedures of exercising preventive and quarantine measures against animal communicable diseases. https://matsne.gov.ge/ka/document/view/3512608
17	Veterinary	Commission Decision 2010/367/EU of 25 June 2010 on the implementation by Member States of surveillance programs for avian influenza in poultry and wild birds.	Resolution No. 597 of the government of Georgia of December 27, 2016, making amendment in the decree No. 348 of the government of Georgia of July 14 th , 2015 Tbilisi on approval of the procedures of exercising preventive and quarantine measures against animal communicable diseases https://matsne.gov.ge/ka/document/view/3512608
18	Veterinary	Commission Decision 2002/106/EC of 1 February 2002 approving a Diagnostic Manual establishing diagnostic procedures, sampling methods and criteria for evaluation of the laboratory tests for the confirmation of classical swine fever.	Resolution No. 498 of the Government of Georgia of November 8, 2016 Tbilisi –Technical regulation- on approval of classical swine fever diagnostic manual. https://matsne.gov.ge/ka/document/view/3429819
19	Veterinary	Commission Decision 2003/422/EC of 26 May 2003 approving an African swine fever diagnostic manual.	Resolution No. 496 of the Government of Georgia of November 7, 2016 Tbilisi –Technical regulation-on approval of African swine fever diagnostic manual https://matsne.gov.ge/ka/document/view/3429082

	Policy Area	EU Legislation	Legislation of Georgia
20	Veterinary	Commission Decision 2006/437/EC of 4 August 2006 approving a Diagnostic Manual for avian influenza as provided for in Council Directive 2005/94/EC.	Resolution No. 637 of the Government of Georgia of December 30, 2016 Tbilisi –Technical regulation-on approval of diagnostic manual for avian influenza. https://matsne.gov.ge/ka/document/view/3529339
21	Veterinary	Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies.	Resolution No. 600 of the Government of Georgia of December 28, 2016 Tbilisi –Technical regulation-on approval of the rule for the prevention, control and eradication of certain transmissible spongiform encephalopathies. https://matsne.gov.ge/ka/document/view/3518699
22	Veterinary	Commission Decision 2001/183/EC of 22 February 2001 laying down the sampling plans and diagnostic methods for the detection and confirmation of certain fish diseases and repealing Decision 92/532/EEC.	Resolution No. 636 of the Government of Georgia of December 30, 2016 Tbilisi –Technical regulation-on approval of the sampling plans and diagnostic methods for the detection and confirmation of viral haemorrhagic septicaemia (VHS) and infectious haematopoietic necrosis (IHN). https://matsne.gov.ge/ka/document/view/3529268
23	Phyto-Sanitary	Council Directive 2000/29/EC of 8 May 2000 on protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread within the Community.	Resolution No. 429 of the Government of Georgia of December 31, 2016 on “Approval of the Rule of the Phytosanitary Border Quarantine Control and Veterinary Border Quarantine Control”. https://matsne.gov.ge/ka/document/view/1177930
24	Phyto-Sanitary	Commission Directive 92/90/EEC of 3 November 1992 establishing obligations to which producers and importers of plants, plant products or other objects are subject and establishing details for their registration.	Resolution No. 619 of the Government of Georgia on “Obligations of business operators producing, processing or distributing plants, plant products and other phytosanitary objects and establishing rules for their registration. https://matsne.gov.ge/ka/document/view/3525391
25	Phyto-Sanitary	Council Directive 2007/33/EC of 11 June 2007 on the control of potato cyst nematodes and repealing Directive 69/465/EEC.	Resolution No. 302 of the Government of Georgia of July 1, 2016 on “approval of the rule on potato cyst nematodes. https://matsne.gov.ge/ka/document/view/3327972

ANNEX 2: STATISTICS ON ANIMALS SLAUGHTERED IN GEORGIA UNDER VETERINARY CONTROL, 2015-16

Month	2015				2016			
	Cattle	Sheep	Pigs	Poultry	Cattle	Sheep	Pigs	Poultry
I	11,697	385	3,280	4,441	15,056	337	7,546	137,236
II	11,591	186	3,147	11,190	16,616	666	5,796	86,454
III	3,088	21	471	20,647	18,924	1,785	5,568	126,883
IV	19,259	134	3,616	37,078	18,909	1,798	6,067	125,578
V	17,166	208	3,327	26,574	16,447	1,214	7,282	125,909
VI	15,408	284	3,406	21,686	18,464	5,320	7,621	149,522
VII	18,113	325	5,125	45,718	18,191	1,731	9,108	118,545
VIII	18,167	969	5,361	26,894	18,227	10,668	8,946	136,843
IX				33,967	18,494	6,289	9,043	171,542
X	19,285	973	8,964	66,492	16,550	1,190	5,471	108,608
XI	15,692	876	7,220	41,674	21,395	12,370	9,525	183,379
XII	15,149	661	7,771	59,670	17,634	16,383	8,802	141,187
Total Slaughtered Under Veterinary Control	164,615	5,022	51,688	396,031	214,907	59,751	90,775	1,611,686
<i>- Monthly Average</i>	14,965	457	4,699	33,003	17,909	4,979	7,565	134,307
Monthly Average Slaughtered	55,229	74,283	24,713	1,834,563	38,838	65,158	16,775	1,678,646
% Slaughtered Under Veterinary Control	27%	1%	19%	2%	46%	8%	45%	8%

ANNEX 3: INTERNATIONAL OR EU STANDARDS ADOPTED IN 2016

TC 2 – Quality Management and Certification		
ISO/IEC	17007:2009	Conformity assessment -- Guidance for drafting normative documents suitable for use for conformity assessment
ISO/IEC	17043:2011	Conformity assessment -- General requirements for proficiency testing
TC 3-Food products		
ISO	6888-1:1999	Microbiology of food and animal feeding stuffs -- Horizontal method for the enumeration of coagulase-positive staphylococci (<i>Staphylococcus aureus</i> and other species) -- Part 1: Technique using Baird-Parker agar medium
ISO	6888-1:1999 Amd 1:2003	Microbiology of food and animal feeding stuffs -- Horizontal method for the enumeration of coagulase-positive staphylococci (<i>Staphylococcus aureus</i> and other species) -- Part 1: Technique using Baird-Parker agar medium
ISO	6888-2:1999	Microbiology of food and animal feeding stuffs -- Horizontal method for the enumeration of coagulase-positive staphylococci (<i>Staphylococcus aureus</i> and other species) -- Part 2: Technique using rabbit plasma fibrinogen agar medium
ISO	6888-2:1999 Amd 1:2003	Microbiology of food and animal feeding stuffs -- Horizontal method for the enumeration of coagulase-positive staphylococci (<i>Staphylococcus aureus</i> and other species) -- Part 2: Technique using rabbit plasma fibrinogen agar medium
ISO	11290-2:1998	Microbiology of food and animal feeding stuffs -- Horizontal method for the detection and enumeration of <i>Listeria monocytogenes</i> -- Part 2: Enumeration method
ISO	11290-2:1998 Amd 1:2004	Microbiology of food and animal feeding stuffs -- Horizontal method for the detection and enumeration of <i>Listeria monocytogenes</i> -- Part 2: Enumeration method
ISO	21528-1:2004	Microbiology of food and animal feeding stuffs -- Horizontal methods for the detection and enumeration of Enterobacteriaceae -- Part 1: Detection and enumeration by MPN technique with pre-enrichment
ISO	21528-2:2004	Microbiology of food and animal feeding stuffs -- Horizontal methods for the detection and enumeration of Enterobacteriaceae -- Part 2: Colony-count method
ISO/TS	22002-1	Prerequisite programs on food safety -- Part 1: Food manufacturing
ISO	18593:2004	Microbiology of food and animal feeding stuffs -- Horizontal methods for sampling techniques from surfaces using contact plates and swabs
ISO/TS	22964:2006	Milk and milk products -- Detection of <i>Enterobacter sakazakii</i>

ANNEX 4: NFA CAPACITY BUILDING ACTIVITIES IN 2016

Date	Type	Activity Name	Topics	Location(s)	Type(s) of Participants
Jan	Workshop	Workshop on Table of Concordance	Food Safety	Tbilisi, Georgia	NFA staff, MoA staff
Jan	Workshop	Workshop on Table of Concordance	Directive 2007/33/EC	Tbilisi, Georgia	NFA staff, MoA staff
Feb	Training	ISO 9001 Training	Quality management	Tbilisi, Georgia	NFA
Feb	Workshop	Workshop on Approximation of Phytosanitary Issues	Approximation of phytosanitary issues to EU directives	Tbilisi, Georgia	NFA
Feb	Working Group	Vet working group meeting	Animal identification-registration	Borjomi, Georgia	NFA, MoA
Feb	Working Group	Plant Protection Working Group	Directive 2007/33/EC	Tbilisi, Georgia	NFA, MoA
Feb	Working Group	Plant Protection Working Group	Directive 2007/33/EC	Tbilisi, Georgia	NFA, MoA
Feb	Training	Training	ISO 19011	Georgia	NFA
Feb	PPD	Civic Hall	NFA meeting with Stakeholders	Georgia	NFA, MoA, Stakeholders
Feb	Training	Training (over 2 months)	Microsoft PowerPoint and Project	Tbilisi, Georgia	NFA Admin, PR, and HR
Feb	Working Group	Plant Protection Working Group	2000/29 Directive	Tbilisi, Georgia	NFA, MoA
Mar	Training	Training	effective communication	Georgia	NFA
Mar	Training	ISO 9001 Training	Quality management	Tbilisi, Georgia	NFA
Mar	Training	Seminar for reg. phyto. Specialists	Pesticide regulations, labeling, Placing in the mark.	Tbilisi, Georgia	NFA
Mar	Conference	Conference	Rabies and dog population management	Istanbul, Turkey	NFA
Mar	Working Group	Plant Protection Working Group	Directive 92/90/EEC	Tbilisi, Georgia	NFA, MoA
Mar	Training	Training	English course	Georgia	NFA
Mar	Workshop	Workshop on Table of Concordance	Model consideration	Tbilisi, Georgia	NFA staff, MoA staff
Mar	Training	Training	Accounting control of budgetary organizations	Tbilisi, Georgia	NFA
Mar	Training	Training	Internal Audit	Georgia	NFA
Mar	Training	Training	IT programs	Georgia	MoA, NFA
Mar	Training	Training	English course	Georgia	NFA

Date	Type	Activity Name	Topics	Location(s)	Type(s) of Participants
Apr	Training	Training	HACCP Audits	Tbilisi, Georgia	NFA HO and RO staff
Apr	Working Group	Plant Protection Working Group	Directive 92/90/EEC	Tbilisi, Georgia	NFA, MoA
Apr	Working Group	Plant Protection Working Group	Directive 92/90/EEC	Tbilisi, Georgia	NFA, MoA
Apr	Working Group	Vet working group meeting	Avian Flu	Tbilisi, Georgia	NFA, MoA
Apr	Working Group	Vet working group meeting	Pig identification-registration	Tbilisi, Georgia	NFA, MoA
Apr	Workshop	Brucellosis Workshop	National brucellosis strategy and control program	Kakheti, Georgia	NFA, FAO, GIPA, FBOs, Vet's, farmers
Apr	Workshop	Brucellosis Workshop	National brucellosis strategy and control program	Kvemo Kartli, Georgia	NFA, FAO, GIPA, FBOs, Vet's, farmers
Apr	Workshop	Brucellosis Workshop	National brucellosis strategy and control program	Samtskhe-Javakheti, Georgia	NFA, FAO, GIPA, FBOs, Vet's, farmers
Apr	Training	Training	Office programs	Georgia	NFA
Apr	Training	Training	English course	Georgia	NFA
May	Training	Training	TSE (Veterinary)	Tbilisi, Georgia	NFA staff, MoA staff
May	Training	Training	TSE (Veterinary)	Tbilisi, Georgia	NFA staff, MoA staff
May	Workshop	Workshop	TAIEX mission	Tbilisi, Georgia	NFA, MoA staff
May	Workshop	TAIEX Workshop	Peer Assessment on SPS & animal welfare legislation	Tbilisi, Georgia	NFA, MoA, SRCA, RS, LMA
May	Study Tour	Study tour	IPM new strategy in greenhouse vegetables	Gardabani/Rustavi, Georgia	NFA
May	Study Tour	Study tour	sampling procedures on Plants and PP	Latvia	RS
May	Working Group	Plant Protection Working Group	Directive 2007/33/EC	Tbilisi, Georgia	NFA, MoA
May	Workshop	Anthrax Influenza Workshop	Anthrax surveillance, outbreak and control issues	Tbilisi, Georgia	NFA, MoA, LMA, SRCA
May	PPD	Civic Hall	NFA meeting with Stakeholders	Georgia	NFA, MoA, External Stakeholders
May	Workshop	Workshop on Table of Concordance	legislation approximation	Georgia	NFA, MoA
May	Training	Training	English course	Great Britain	NFA
Jun	Workshop	Workshop on ToCs	2003/85/EC Directive	Tbilisi, Georgia	NFA staff, MoA staff
Jun	Training	Training	PR	Georgia	NFA
Jun	Training	Training	Food Safety and Phytosanitary Department SOPs	Georgia	NFA
Jun	Training	Training	Budget accounting	Georgia	NFA
Jun	Training	Training	Microbiological criteria for foodstuffs	Tbilisi, Georgia	NFA
Jul	Workshop	Workshop	EU FMD - Simulation exercise	Borjomi, Georgia	NFA, MoA, Police, EU Delegation

2016 Assessment of the Georgian Government's Food Safety Reforms

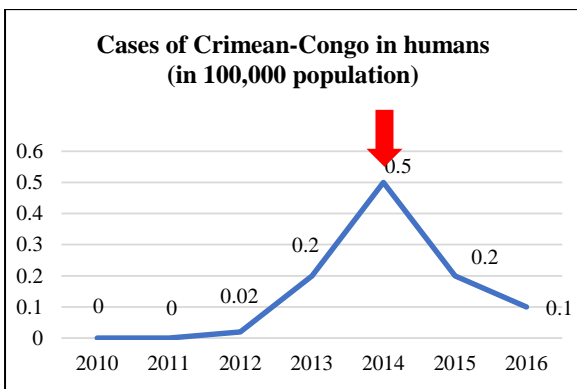
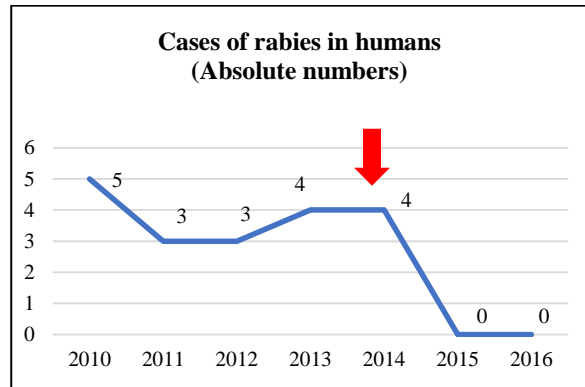
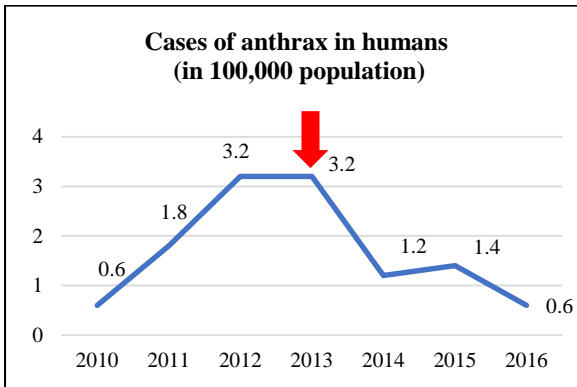
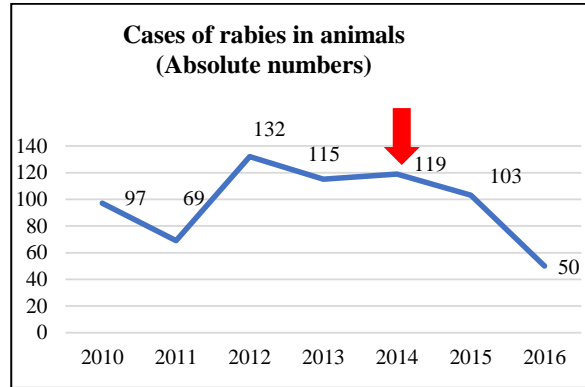
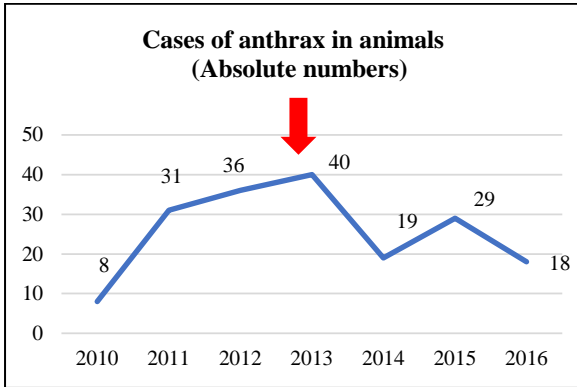
Date	Type	Activity Name	Topics	Location(s)	Type(s) of Participants
Jul	Working Group	Plant Protection Working Group	Directive 92/90/EEC	Tbilisi, Georgia	NFA, MoA
Jul	PPD	Roundtable on approximation process	Honey	Batumi, Georgia	NFA, MoA, Stakeholders
Jul	Training	Training	Archivist	Georgia	NFA
Jul	Workshop	Private Laboratory Workshop	Availability and readiness to comply with EU regulation	Tbilisi, Georgia	NFA, Public and Private Laboratories
Aug	Training	Training	Agrochemical Classification/registration	Tbilisi, Georgia	MoA, NFA, LMA, RS
Aug	Working Group	Vet working group meeting	TSE, BSE	Tbilisi, Georgia	NFA, MoA
Aug	Conference	EAAP Annual Meeting 2014	Conference	Copenhagen, Denmark	NFA
Aug	Workshop	Workshop	Microbiological and other contaminants	Georgia	NFA
Aug	Training	Training	English course	Great Britain	NFA
Sep	Workshop	Workshop/training	Stray dog population management	Tbilisi, Georgia	NFA, RSPCA, NGO's, Private vets
Sep	Study Tour	Study tour	Animal emerging & transboundary diseases	Israel	NFA
Sep	Working Group	Vet working group meeting	Brucellosis	Tbilisi, Georgia	NFA, MoA
Sep	Workshop	Workshop on Table of Concordance	2003/85/EC Directive	Tbilisi, Georgia	NFA staff, MoA staff
Sep	Conference	IOBC Conference	Plant Pest mites biological control	Spain	LMA
Oct	Workshop	Workshop	sampling procedures on Plants and PP	Tbilisi, Georgia	RS NFA
Oct	Training	Training	DEST - pest taxonomy	Sweden	LMA
Oct	PPD	Roundtable on issues of approximation process Honey		Batumi, Georgia	NFA, MoA, Stakeholders
Nov	PPD	Civic Hall	Animal welfare; pesticides; sheep export/import.	Tbilisi, Georgia	NFA, MoA, NGO'S, FBOs
Nov	Working Group	Vet working group	FMD	Tbilisi, Georgia	NFA, MoA

ANNEX 5: FOOD SAFETY MONITORING ACTIVITIES, 2015-16

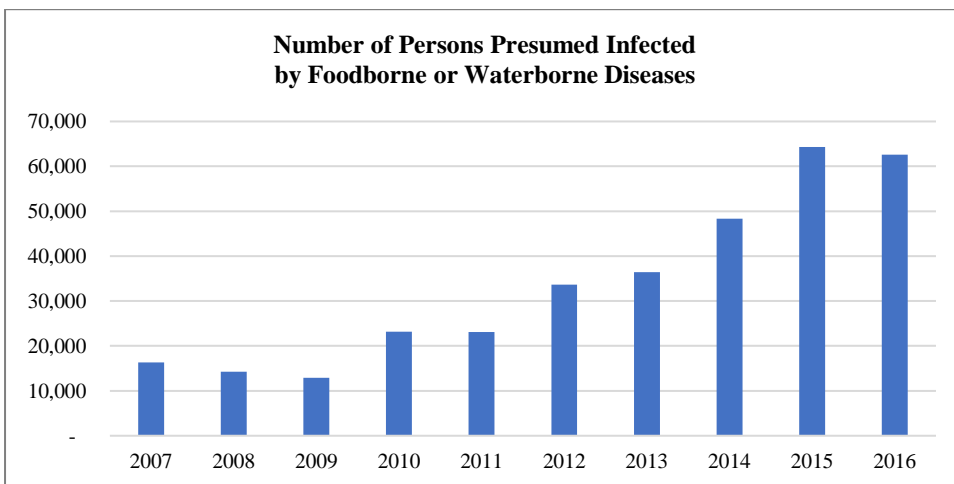
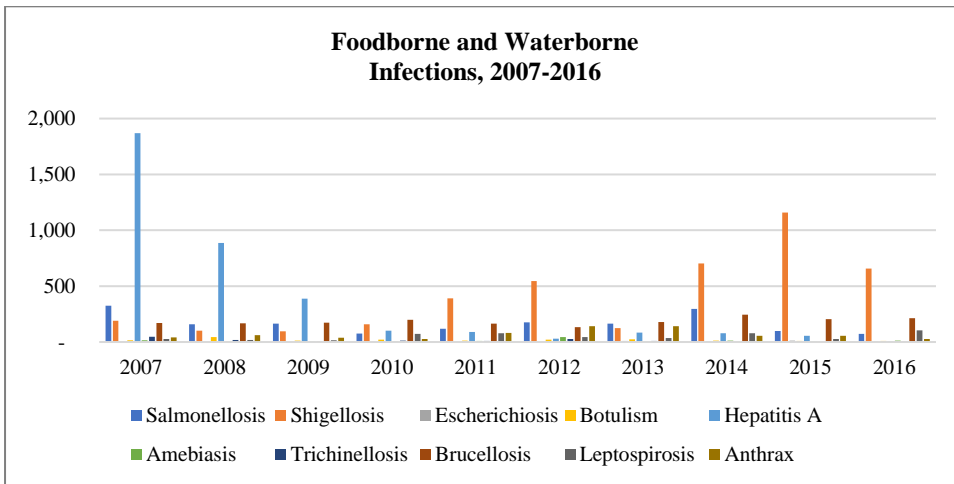
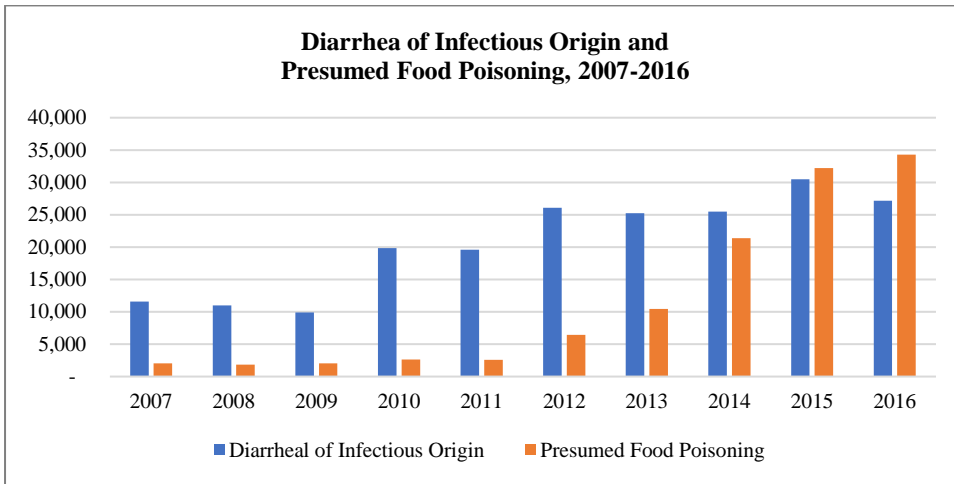
Monitoring	2015			2016		
	Number of samples collected	Non-compliant samples	%	Number of samples collected	Non-compliant samples	%
Listeria Monocytogenes	400	37	9.3%	301	1	0.3%
Salmonella	700	32	4.6%	639	3	0.5%
Vegetable fats in dairy products	150	30	20.0%	250	17	6.8%
Alcoholic beverages	442	66	14.9%	403	53	13.2%
Drinking water (tap water and bottled water)	701	297	42.4%	462	221	47.8%
Amount of GMO in food	100	2	2.0%	200	2	1.0%
Food of non-animal origin	484	61	12.6%	177	4	2.3%
E. coli 0157 in food	-	-	-	150	-	0.0%
Pesticide residues in food of non-animal origin	180	9	5.0%	71	1	1.4%
Meat type identification	98	7	7.1%	100	4	4.0%
Histamine	-	-	-	25	-	0.0%
Food of animal origin	658	209	31.8%	-	-	-
Veterinary drug residues and other contaminants in food of animal origin	166	12	7.2%	257	138	53.7%
Bone content in meat products	37	-	0.0%	40	-	0.0%
Veterinary drug residues and other contaminants in honey	104	20	19.2%	122	19	15.6%
Brucella in raw milk	-	-	-	65	16	24.6%
Total	4,220	782	18.5%	3,262	479	14.7%

ANNEX 6: DECREASE IN ZOOONOTIC DISEASES

Note that the beginning of NFA's interventions is indicated by a red arrow.



ANNEX 7: FOODBORNE DISEASE STATISTICS, 2007-16



ANNEX 8: LIST OF RESPONDENTS

	Organization	Department	Title	Name
1	EU Delegation to Georgia	Delegation	Programme Manager Attaché on Agriculture	Cristina Casella
2	IFC	Food Safety Program	Food Safety Specialist	Natia Mgeladze
3	IFC	Food Safety Program	Manager	Maia Tevzadze
4	Mercy Corps Alliances	Lesser Caucasus Programme in Kvemo Kartli	Program Manager	Giorgi Saunishvili
5	Swiss-Danish RED Program	Livestock and Dairy Value Chain	Expert	Merab Chkhartishvili
6	US CDC, South Caucasus CDC Office	Agency	Medical Epidemiologist, Capt. US PHS	Dr. Juliette Morgan
7	USAID REAP Project	Project Management	Program Manager	Alex Samel
8	USDA - Foreign Agricultural Service	Office of Capacity Building and Development	Agricultural Specialist	Demna Dzirkvadze
9	USDA - Foreign Agricultural Service	Office of Capacity Building and Development	Consultant for USDA SPS Project	Paul Dobbs
10	Investigative Service of the MoF	Administration	Head	Konstantine Katamadze
11	Investigative Service of the MoF	Investigation Department	Deputy Head	Merab Gamkrelidze
12	Marneuli Municipality	Supervisory Services	Head	Revaz Areshidze
13	MoA	Agricultural Cooperative Development Agency	Program Manager	Kote Khutsaidze
14	MoA	Agriculture and Food Department Food Safety Working Group	Deputy Head of Department	Ketevan Laperashvili
15	MoA	Euro Integration Department	Head	Lasha Inauri
16	MoA	Laboratory	Deputy Director	Ana Gulbani
17	MoA	Laboratory	Director	Irakli Guledani
18	MoA	Scientific Research Center, Risk Assessment	Head	Maia Metreveli
19	MoA	Scientific Research Center, Scientific Consultative Council	Advisor	Zurab Tskitishvili
20	MoESD	Georgian Accreditation Center	Director	Paata Gogoladze
21	MoH	Healthcare Department, Regulation Division	Chief Food Safety Specialist	Marina Baidauri
22	MoH	Healthcare Department, Regulation Division	Head	Natia Noghaideli
23	GeoSTM	Institute of Metrology	Director	Nino Mikanadze
24	GeoSTM	International Relations, Protocol and Marketing Division	Head of Division	Ekaterine Labadze
25	GeoSTM	Standards Department	Director	David Tkemaladze
26	NCDC	Department of Infectious Diseases	Epidemiologist	Ana Aslanikashvili
27	NCDC	Department of Infectious Diseases	Foodborne Disease Specialist	Marina Lashkarashvili
28	NCDC	Department of Infectious Diseases	Foodborne Disease Specialist	Pikria Shavreshiani
29	NCDC	Department of Infectious Diseases	Head	Khatuna Zakhshvili
30	NFA	Adjara Regional Department, Batumi	Head	Ilia Sirabidze

	Organization	Department	Title	Name
31	NFA	CIB Program	Programme Financial Manager	Mikheil Dolaberidze
32	NFA	CIB Program	Resident Advisor	Matti Lampi
33	NFA	Drinking Water	Head	Mariam Gordadze
34	NFA	Food and Feed Inspection	Head of Division	Tamta Mikanadze
35	NFA	Food department	Head	Gia Mikadze
36	NFA	International Relations and EU Law Approximation Division	Head	Zurab Zurashvili
37	NFA	Kvemo Kartli Regional Department	Head	Mirangula Liparteliani
38	NFA	Phytopsanitary Department	Deputy Head	Nikoloz Meskhi
39	NFA	Regional Office - Akhalkalaki	Head	Lia Bekauri
40	NFA	Regional Office - Gori	Head	Goga Turashvili
41	NFA	Samegrelo/Zemo Svaneti Regional Department	Head	Marika Gulua
42	NFA	Veterinary department	Head	Lasha Avaliani
43	Revenue Service	Customs Department	Deputy Head	Giorgi Kobeshavidze
44	Revenue Service	International Department	Advisor	Tamar Bukhrashvili
45	Revenue Service	International Relations Department	Head	Samson Uridia
46	Revenue Service	Sanitary, Phytopsanitary, and Veterinary Control Department	Head	Tengiz Martiashvili
47	United Water Supply Company	Administration	Deputy Director	Tamar Nebieridze
48	United Water Supply Company	Administration	Director	Giorgia Tsetskhladze
49	United Water Supply Company	Technical and Operational Issues	Deputy Director	Zaza Sikharulidze
50	Zugdidi Municipality	Supervisory Services	Head	Nukri Esartia
51	Center for Strategic Research and Development	Consumer Rights Protection Program	Food Safety Coordinator	Lia Todua
52	Farmers of the Future	Association	Chairman	Nikoloz Zazashvili
53	Goodwill/Marche	Quality Control	Manager	Levan Chiteishvili
54	I/E Badri Gogoladze	-	Owners	Badri Gogoladze
55	ISO Consulting Company	Certification	Senior Auditor	Ivane Didberidze
56	Natadze Scientific and Research Institute of Sanitary, Hygiene and Medical Ecology	Laboratory	Director	Rezo Kobakhidze
57	Consumers' Association	-	Director	Madona Koidze
58	Sheep Breeders' Association of Georgia	-	Chairman	Beka Gonashvili
59	Independent Expert	-	-	Eter Sarjveladze
60	Independent Expert	-	-	Shalva Melkadze