

Risk-based Inspection and Sampling Manual for Imported Food Commodities



**Bhutan Agriculture and Food Regulatory Authority
Ministry of Agriculture and Forests
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FOREWORD

In accordance with sections 61-64 of Food Act of Bhutan 2005 and Sections 79-89 of Food Rules and Regulations of Bhutan 2017, the importation of food into Bhutan requires food businesses to meet all regulatory requirements and Ministry of Agriculture and Forests is responsible for development of Guideline for Import of Food into Bhutan. Bhutan Agriculture and Food Regulatory Authority (BAFRA) is mandated to implement the Food Import Control System in Bhutan.

The Risk-based Inspection and Sampling Manual for Imported Food Commodities is developed as a user Manual for BAFRA officials for Inspection and Sampling of imported food at the point of entry. The Manual has two parts;

Part 1 provides instructions for decision making on which specific import consignments need to be inspected.

Part 2 of the Manual addresses the detailed inspection and sampling procedure for those consignments where an inspection is required.

The Manual is developed by Bhutan Agriculture and Food Regulatory Authority, Ministry of Agriculture and Forests, Royal Government of Bhutan with technical support and financial support from World Health Organization (WHO) and Food and Agriculture Organization (FAO) of United Nations.

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Director General

INTRODUCTION

This Manual sets out how risk-based decisions are made to determine which imported food consignments should be inspected and how to interpret and gather data to assist in decision making over time. This is the most important decision framework for the implementation of a risk-based imported food inspection program.

This Manual recognises that food imports must be assessed to ensure that it does not impose Biosecurity risk and complies with Bhutan food standard or other relevant standards. Those food imports identified as very high risk for Biosecurity concerns, 100% of imports may need to be inspected by the BAFRA inspectors.

The biosecurity managers will determine whether any pests or diseases are a critical biosecurity concern for Bhutan. If a specific pest or disease is identified as biosecurity concern, the managers will need to consider the appropriate level of protection (ALOP) needed. The managers will need to determine how this ALOP can be measured in inspection procedures. The biosecurity risk assessment and its management will be dealt as per the applicable Rules and Regulations of Bhutan.

The Manual has two parts:

- Part 1 provides instructions for decision making on which specific import consignments need to be inspected.
- Part 2 of the Manual addresses the detailed inspection and sampling procedure for those consignments where an inspection is required.

PART - I

OPERATIONAL FRAMEWORK AND INSTRUCTIONS ON RISK-BASED SELECTION OF IMPORTED FOOD CONSIGNMENTS FOR DETAILED INSPECTION ON-ARRIVAL

1. Background and Scope

This framework principally deals with food imports where biosecurity measures have been met. Modern food safety management frameworks recognise that food safety requires a whole of food chain approach. That is food safety needs to be addressed at each stage along the food chain which, in turn, supports food safety at the next stage in the food supply chain.

The assessment of food imports as they cross the border are a spot check at the point of entry. The importing country has little direct line of sight to the previous management along this food chain before the point of entry, and must rely on documentation, inspection and possibly testing as measures to verify the safety and quality of the food being imported (Figure 1).

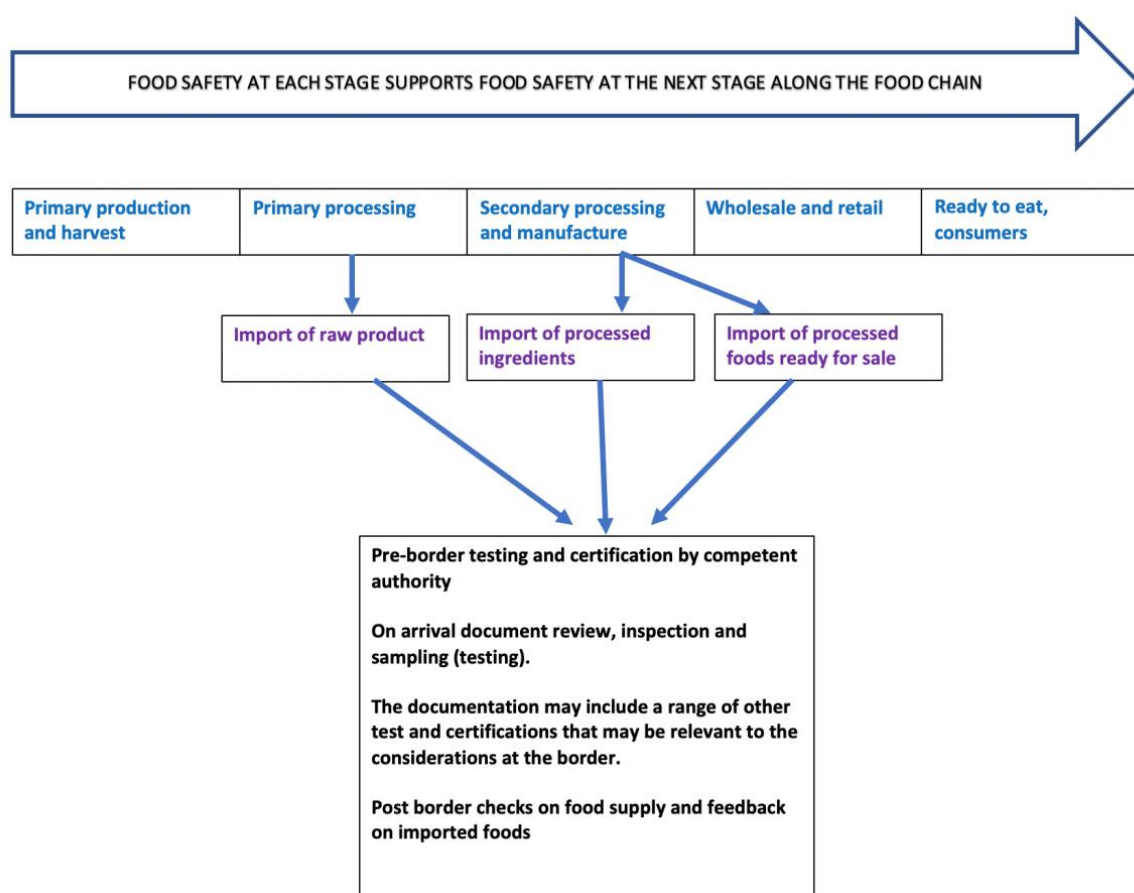


FIGURE 1: FOOD IMPORTS AND THE FOOD SUPPLY CHAIN

For border agencies assessing specific import consignments, the basic unit is the specific product being imported from a known manufacturer / producer by a known importer. This should provide some assurance that the same manufacturing / production conditions and the same handling by the importer apply to successive imports. This is termed as 'import pathway' in the following decision framework.

The decisions in a risk-based framework operate from three broad considerations and it is the sum of these that determines the priority, frequency and intensity of inspections at the border.

These are (in order):

- The inherent risk of the specific food product or commodity.
- The confidence of good food safety management that comes from assessing the accompanying documentation with each consignment.
- The history of previous import inspections and assessments on the import pathway that verify safety assessments or raise concerns that further assessments is needed for assurance that safety is managed well.

In addition, evidence from post market programs (food surveillance, investigations of consumer complaints or investigations of food-borne illness) may show adverse findings for a specific imported food and may require targeted inspection of future imports.

2. Implementing a Risk-based Inspection Program

Step 1: Determining the inherent risk category of the imported food commodities.

Bhutan has developed a risk categorisation framework for imported foods in the ‘Guideline for import of food into Bhutan, 2018’ (Figure 2).

	Physical risks (Risk score 1)	Chemical risks (Risk score 2)	Microbiological Risks (Risk score 3)
Not Ready to eat- <i>definition</i> (Risk score 1)	Risk score 2 <i>Low risk</i>	Risk score 3 <i>Low risk</i>	Risk score 4 <i>Medium risk</i>
Processed Ready to eat (Risk score 2)	Risk score 3 <i>Low risk</i>	Risk score 4 <i>Medium risk</i>	Risk score 5 <i>High risk</i>
Raw ready to eat (Risk score 3)	Risk score 4 <i>Medium risk</i>	Risk score 5 <i>High risk</i>	Risk score 6 <i>High risk</i>

FIGURE 2: Bhutan’s risk classification for imported food

Food Products (risk score 5 or 6) are deemed high risk and must be accompanied by a certificate from a recognised authority

The inherent risk category will determine the primary food inspection priority for assessment of food imports at the border. Foods with risk score 6 and 5 are high risk; score 4 are medium risk; and score 2/3 are low risk for the purposes of risk-based management decisions.

This framework has been used to classify food imports (Table 1). This requires that future new classes of imports will need to be analysed in this framework and the list expanded as is needed.

Table 1: Risk-based classification of foods imported into Bhutan

Category	Food	Animal biosecurity risk	Food Safety Risk score	Plant biosecurity risk
Livestock products	Fresh, Frozen meat	High	4	N/A
	Dried meat	High	2/3	N/A
	Salted meat	High	2/3	N/A
	Fresh dairy products	High	6	N/A
	Fresh, frozen fish	High	4	N/A
	Canned meat, dairy, fish	Low	5	N/A
	Dried fish	Low	2/3	N/A
	Shelf stable dairy products	Low	2/3	N/A
Plant products	Fresh, frozen vegetables	N/A	3/4	Fresh - Medium Frozen – Low
	Seaweed			N/A
	Fresh, Frozen fruits	N/A	4/5	Fresh - Medium Frozen – Low
	Canned vegetables and fruits	N/A	High acid - 4 Low acid - 5	N/A
	Vegetable and fruit juices.	N/A	Shelf stable or pasteurised - 4 Unpasteurized - 6	N/A
	Spices	N/A	Dried - 3, 4 Fresh - 4,5,6	N/A Ground spices - Medium Whole spices/grains - Medium Bark, leaves, seed grains –High
	Dried pulses, grains, rice	N/A	3/4	If postharvest treated - medium Untreated - high
	Dried pasta	N/A	3	N/A
Prepackaged foods	Breads, cookies, biscuits	N/A	3/4	N/A
	Soft drinks	N/A	2/3	N/A
	Chips, snacks	N/A	2/3	N/A
	Crackers	N/A	2/3	N/A
	Sauces, dressings	N/A	3/4	N/A
	Sweets, candies,	N/A	2/3	N/A

	chocolate			
	Beverages (e.g., tea, coffee)	N/A	3	N/A
	Sugar, sweeteners	N/A	3	N/A
Specialty foods	Infant foods	N/A	5	N/A
	Meal replacements (e.g., boost)	N/A	5	N/A
	Geriatric foods	N/A	5	N/A

Source: Guideline for import of food into Bhutan, 2018

Step 2: Evaluating the evidence accompanying the specific imported food commodities

There are a range of certificates or other evidence/data that relate to the specific imported commodities and the specific lot / batch being imported. These can be assessed to give a level of confidence that food safety has been properly managed. Tables 2, 3 and 4 profile the types of certification for animal derived, plant-based and processed foods and ingredients and the level of confidence of food safety that can be drawn from the type of accompanying certification.

TABLE 2: Evidence and confidence levels that food safety is properly addressed for animal derived food products (meat, fish, poultry, eggs, dairy)

Evidence accompanying product/import	Level of confidence	Comment
No evidences of any form	0	
Farm self-asserted GAP	1	
Farm self-asserted GVP	1	
Primary processor self-asserted GHP	1	
Primary processor self-asserted GMP	1	
Primary processor self-asserted HACCP	2	
Secondary processor / manufacturer self-asserted GMP	1	
Secondary processor / manufacturer self-asserted HACCP	2	HACCP is a stronger indicator of ongoing food safety management
Government regulation of veterinary medicines and residues	2	Country profile evidence
Government veterinary residue monitoring program	3	Country profile evidence
Laboratory data on veterinary residues for consignment	4	These may be relevant to require as import conditions, where available or mandatory where specific concerns are apparent. <i>Note: Such data from accredited laboratories is more reliable than that from</i>

		<i>unaccredited labs.</i>
Laboratory data on microbial tests for consignment	4	These may be relevant to require as import conditions, where available or mandatory where specific concerns are apparent. <i>Note: Such data from accredited laboratories is more reliable than from unaccredited labs.</i>
Government certification of GAP, GVP, GHP, GMP, HACCP programs	4	These may be relevant to require as import conditions where available
Certificates from accredited inspection/testing/certification bodies	5	These may be relevant to require as import conditions where available
Government safety certificate for import	5	You need to verify that this is based on data with level 3 or above levels of confidence as part of the exporting country profile.

(GAP= Good Agricultural Practices; GVP= Good Veterinary Practices; GHP= Good Hygiene Practices; GMP= Good Manufacturing Practices; HACCP= Hazard Analysis Critical Control Point).

Note: 0 indicates lowest level of confidence and 5 indicates highest level of confidence

TABLE 3: Evidence and confidence levels that food safety is properly addressed for plant-based foods

Evidence accompanying product/import	Level of confidence	Comment
No evidences of any form	0	
Farm self-asserted GAP	1	
Primary processor self-asserted GHP	1	
Primary processor self-asserted GMP	1	
Primary processor self-asserted HACCP	2	HACCP is a stronger indicator of ongoing food safety management
Secondary processor / manufacturer self-asserted GMP	1	
Secondary processor / manufacturer self-asserted HACCP	2	HACCP is a stronger indicator of ongoing food safety management
Government regulation of pesticides and their residues	2	Country profile evidence
Government pesticide residue monitoring program	3	Country profile evidence
Laboratory data on pesticide residues for consignment	4	These may be relevant to require as import conditions where available or mandatory where specific concerns are apparent. <i>Note: Such data from accredited laboratories is more reliable than from unaccredited labs.</i>
Government certification of GAP, GVP, GHP, GMP, HACCP	4	These may be relevant to require as import conditions where available

programs		
Certificates from accredited inspection/testing/certification bodies	5	These may be relevant to require as import conditions where available
Government safety certificate for import	5	You need to verify that this is based on data with level 3 or above levels of confidence as part of the exporting country profile.

Note: 0 indicates lowest level of confidence and 5 indicates highest level of confidence

The management of imports of processed pre-packaged foods and ingredients generally relies on two main general understandings. Firstly, any reputable manufacturer should have HACCP or at least GMP frameworks applied to their factory management procedures. Both GMP and HACCP systems include requirements to manage incoming ingredients and foods to ensure food safety. Secondly, most shelf stable processed pre-packaged foods are manufactured in a manner that reduces the microbiological hazards to an acceptable level. Where risks of some hazards remain (for example, the risk of aflatoxin in some nuts and seeds), specific assurances may be sought to manage this risk.

TABLE 5: Evidence and confidence levels that food safety is properly addressed for processed pre-packaged food and processed ingredients

Evidence accompanying product/import	Level of confidence	Comment
No evidences of any form	0	
Manufacturer self-asserted GMP	1	
Manufacturer self-asserted HACCP	3	HACCP is a stronger indicator of ongoing food safety management
Laboratory data on microbial tests	4	These may be relevant to require as import conditions where available <i>Note: Such data from accredited laboratories is more reliable than from unaccredited labs.</i>
Government certification of GMP, HACCP programs	4	These may be relevant to require as import conditions where available
Certificates from accredited inspection/testing/certification bodies	5	These may be relevant to require as import conditions where available
Government safety certificate for import	5	You need to verify that this is based on data with level 3 or above levels of confidence as part of the exporting country profile

Note: 0 indicates lowest level of confidence and 5 indicates highest level of confidence

The conclusions one can draw from this analysis is that food imports along an import pathway that have level 4 or 5 documentation (that provide detailed evidence about the specific consignment) are most likely of much lower risk than equivalent products on a

different import pathway with level 3 or lower documentation and certification (which is more general in nature). Foods with 4 or 5 level evidence should be subject to routine inspection and those with lower grade evidence (3 or lower) to targeted inspection (Table 6).

Table 6: Combining theoretical risk and confidence of good management derived from the documentation accompanying the consignment

Food risk category	Level of confidence that accompanying documentation evidence shows good food safety management	
	Level 4 or 5 evidence	Level 3 or lower evidence
High risk (Risk categories 5 and 6)	Priority 2 ROUTINE INSPECTION	Priority 1 TARGETED INSPECTION
Medium risk (Risk category 4)	Priority 4 ROUTINE INSPECTION	Priority 3 TARGETED INSPECTION
Low risk (Risk categories 2 and 3)	Priority 6 ROUTINE INSPECTION	Priority 5 TARGETED INSPECTION

Step 3: Implementing a dynamic risk-based inspection program

This framework recognises that the inspection framework needs to take account of both the generic inherent risk level and confidence of good food safety management that comes from accompanying documentation and evidence, and that measurement of food safety in border inspections will inevitably show some variation between batches/lots in successive imports on the same import pathway. It allows for increased inspections where problems are identified. It also allows for a reduction of the inspection rate to a base level for each risk category once safety performance is re-established by clear imports.

The tabulation above (Table 6) gives six priority groups based on risk assessment of the core criteria. This can be put into a framework outlining a risk-based inspection schedule (Table 7).

Table 7: Risk-based determination of inspection schedules

<i>Inherent food safety risk group</i>	<i>Inspection schedule</i>		Comments
	<i>TARGETED (once the required number of clear inspections move to routine inspection schedule)</i>	<i>ROUTINE (any failure at this level is an indicator of poor performance – move to targeted inspection schedule)</i>	
High risk (Risk categories 5 and 6)	Inspect 100% of first 10 (possibility) to reduce consignments on specific import pathway to establish pattern of safety and compliance then move to routine inspection schedule. [Priority 1]	Inspect 5% of all consignments on specific import pathway (<i>define</i>). [Priority 2] Any failure or evidence of failure from other sources move specific product to targeted inspection schedule.	<ul style="list-style-type: none"> • Document check incl. certificates and test results. • Detailed inspection. • Laboratory testing if questions remain. • Reject consignment where critical failure of safety measure. • Inform competent authority in exporting country of any failure and provide evidence. • Raise failures with importer (with evidence) to negotiate improvements to quality of future imports.
Medium risk (Risk category 4)	Inspect 100% of first 5 consignments on specific pathway to establish pattern of safety and compliance then move to routine inspection schedule. [Priority 3]	Inspect 5% of all consignments on specific pathway. Any failure or evidence of failure from other sources move specific product to targeted inspection schedule. [Priority 4]	<ul style="list-style-type: none"> • Document check. • Detailed inspection.
Low risk (Risk category 2 and 3)	Inspect 100% (3) of consignments on specific import pathway to establish pattern of compliance then move to routine inspection schedule. [Priority 5]	Inspect 5% random of all consignments regardless of pathway. (Note: This is a very low intervention rate.). Any failure or evidence of failure from other sources move specific product to targeted inspection schedule. [Priority 6]	<ul style="list-style-type: none"> • Document check. • Quick inspection for gross problems (damaged packaging, contamination), labelling compliance.

This risk management system (Table 7) demands access to good data on the performance of food on specific ‘import pathways’ in order to assess performance characteristics. At present, existing import data systems in Bhutan do not provide searchable data set for import pathway assessment. Therefore, each import location will need to develop a running list to assist in checking performance for adjustment to inspection schedules. This may be paper based (see Annexure I) or may be developed as a stand-alone database for use on the computers at each border post.

This running list should be updated regularly as inspection identify problems with imports or where evidence from other programs (market surveillance, investigations of food borne illness or consumer complaints) indicates a food safety concern with the specific food. Annexure I outlines draft running tables that may be used at border posts for high, medium and low risk food products.

It is important to note that other data (post market surveillance, investigations of consumer complaints, or investigation of food-borne illness incidents) that identify failures of food safety or compliance with Bhutan food standards should also be included in this framework. These result in the specific commodity being classified as poor performing and requiring future import consignments to be inspected under the targeted inspection frequency for that risk category of food. Over time, this data will build a clear picture of import profiles and provide increased confidence in the framework for assessment of food imports.

Having selected which consignments must be inspected in detail using this framework, Part 2 (Inspection protocols and work instructions for the inspection and sampling of imported food) details the procedures for risk-based inspection and any sampling required from the consignment being examined.

3. Work instruction for implementing this framework

***Note:** These tasks should be carried out by the senior inspector (team leader) at the location. Any issues or questions should be discussed with senior staff at BAFRA head office. It is important that BAFRA head office is aware of inspection programs and priorities at all times.*

Step 1: Is this a new food or has it been imported previously? (Check the Customs database of imports to confirm). Record history of past imports in the last 6 months needs to be maintained. The number of imports will indicate frequency of import and will assist in planning of the inspection program.

Step 2: Has the risk category of the specific food been assessed? Check Table 1 above and record the risk category. If not present, apply the risk assessment framework (Figure 2) to identify the risk category working with the senior managers at BAFRA head office. Record your findings.

Step 3: What documents/evidences are presented with the import consignment? Check documentation and assess the level of evidence from Tables 2–5 above for the relevant category of product. Record your findings.

Step 4: Based on your findings, determine the priority category (Table 6) and the appropriate inspection schedule (Table 7) for the consignment.

***Note:** All new foods or foods where an issue has been identified are placed in the targeted inspection schedule until a history of safe import is established. This is recorded in a running sheet which is an active management tool and must be kept up to date.*

Step 5: Check whether there is any evidence from post-market surveillance, investigation of consumer complaints or investigation of food-borne illness that requires the food

consignment to be in the targeted inspection schedule.

Step 6: Is the food identified as part of a surveillance program for specific food hazards or compliance issues in imported food. If so, list consignment for inspection and sampling.

Step 7: Check the running sheet to see if the food is already listed for targeted inspection and check the history of past clear inspections from the running sheet.

Step 8: If the food is identified as a targeted Inspection schedule priority, prepare for an inspection of the consignment.

Step 9: If identified as a routine inspection schedule priority, check the Customs data to see when last inspected and make a decision as to whether the specific consignment needs to be inspected. If the food consignment is selected for random inspection under the routine schedule, prepare for an inspection of the consignment.

PART – II

INSPECTION PROTOCOLS AND WORK INSTRUCTIONS FOR THE INSPECTION AND SAMPLING OF IMPORTED FOOD COMMODITIES

1. Background and Scope

These protocols and work instructions address operational aspects of risk-based imported food inspection and sampling to ensure objective results. It is restricted to inspection of consignments of food items as they cross the border and does not address inspection for biosecurity concerns, or of food production facilities.

It also provides detailed instructions on how commodities should be inspected and sampled to ensure an accurate inspection outcome, and when and how samples should be taken for further laboratory analysis. In all cases, the results of inspections should be documented so that the evidence can be used to plan future inspection programs.

Risk-based inspection procedures rely on evidence and regular verification of the evidence provided with the import consignment. There should be random confirmation and verification of certification with the certifying authorities (competent authority, service treatment providers and laboratories) in the exporting country.

The routine inspection schedule is structured to allow BAFRA to continually verify that products considered to be safe and meeting Bhutan's requirements continue to do so over time.

Part of the evidence base is also derived from surveys of specific food safety hazards in specific foods. These surveys should be run in parallel with the import inspection program to generate accurate data on food safety of specified imports where there may be any concerns. These surveys may be triggered by issues raised internationally or from domestic post market activities such as food surveillance, investigations of food-borne illness or consumer complaints.

The National Food Testing Laboratory is an accredited food laboratory and has the capacity to be the national reference laboratory for food safety. However, the distance from major entry points and the population centres limits timely access for sample transfer for immediate testing. There is the need to develop rapid screening capacity at major entry points to complement the capacity of National Food Testing Laboratory.

2. Inspection procedures: General methods applicable to all incoming consignments

Every consignment, regardless of whether it is selected for detailed inspection, should receive a general quick visual inspection to confirm identity and provide a rapid check for any problems.

This allows an assessment of any obvious signs of issues that may indicate that a more detailed inspection is warranted. These general methods can be done quickly to confirm the status of the consignment.

3. Work instruction 1: Visual inspection of all imported food consignments

STEP 1: Make sure you have necessary forms to record findings and ensure that it is safe to do an inspection.

Step 2: Documentation check for all cargo. Is the specific consignment as described in the documentation?

Check import consignment details, commercial documents, import permits (if needed) and certification against labels and product identifiers to ensure that the actual consignment is as described in the documentation. If the documentation is not for the consignment, seek clarification and amend before progressing.

If accurate documentation is not available, fail the consignment.

STEP 3: Assessment of certificates from the competent authority of the exporting country

Sanitary or phytosanitary, or food safety and English translation of labelling certificates need to be checked against the consignment identity details (product, lot, batch, etc) to confirm certification relates to the product being imported.

DECISION: Has the consignment been selected for random verification of documentation? If so, copy or scan the certificates to be verified for later confirmation with the exporting country authorities. The consignment need not be held up during this verification process unless there is evidence / suspicion that the documentation is fraudulent.

STEP 4: Assessment of Treatment certificates

- Check the provider;
- Check treatment rates for commodity (including date, duration, dosage and temperature);
- Check for stamps and seals; and
- Check for links to the consignment (number of packages and type of consignment) against other paperwork (Ocean Bill of Lading (OBOL)/ Air-Way Bill (HAWB or MAWB)/ Container number).

DECISION: Has the consignment been selected for random verification of documentation? If so, copy or scan the certificates to be verified for later confirmation with the service provider.

STEP 5: Assessment of any other documentation provided relating to the specific consignment

Check documents and confirm validity. Have these been seen previously and has there been any process to verify accuracy? Are they linked to the specific consignment, to the manufacturing plant or general to the industry?

STEP 6: Packaging integrity checks:

Open any wrapped consignments and check the integrity of product transport packaging to ensure no damage or contamination. If the outer packaging is damaged, check product packaging to ensure integrity and lack of obvious contamination. Is

there any evidence of contamination or spoilage (smell, weeping liquids, insect pests) that would require a closer examination and a more detailed inspection? (TAKE PHOTOS).

STEP 7: Final assessment decision from initial visual inspection

If there are no adverse findings or a sign that needs further inspection of consignment, and if the consignment has not been selected for detailed inspection, release the consignment to the importer.

Step 8: Close out the inspection record (form)

Record the findings and outcomes of the inspection process and file so that these are available for framing and conduct of future inspections along that import pathway.

4. Selection of representative lots for detailed inspection from the consignment

Consignments of imported food may be bulk unpackaged commodities or may consist of a number of lots (bagged, boxed). It is important to select a representative lot from the consignment to ensure an accurate assessment in the inspection process.

The sampling of bulk commodities require at least 5 samples drawn randomly from the consignment. Samples should be drawn from different parts of the commodity (top, bottom, side, front, back, and centre). Do not collect all samples from the same location in the commodity. Depending on the commodity and inspection and testing protocols, the samples may be combined into a composite sample for inspection and collection of a sample for laboratory analysis.

For consignments consisting of multiple boxes, bags or other containers of the same product, determine the number of lots (boxes, bags, etc) needed to ensure a representative sample by using the rule of cubes. This rule requires that the minimum number of lots to be examined is the largest whole number of the cube root of the total number of lots in the consignment. This is outlined in Table 1.

Table 1: Calculation for number of units for detailed inspection needed from a consignment based on rule of Cubes

Number of lots in consignment	Minimum number of lots to be examined for representative inspection	Cube of minimum sample	Comment
1	1	$1^3 (1 \times 1 \times 1) = 1$ Therefore, cube root of 1 is 1.	Inspect the single lot in consignment. If more than one lot in consignment, select 2 lots at random.
Up to 8	2	$2^3 (2 \times 2 \times 2) = 8$ Therefore, cube root	Inspect 2 lots selected at random

		of 8 is 2.	from the consignment. If 9 or more lots in consignment, select 3 lots at random.
Up to 27	3	$3^3 (3 \times 3 \times 3) = 27$ Therefore, the cube root of 27 is 3.	Inspect 3 lots selected at random from the consignment. If 28 or more lots in consignment, select 4 lots at random.
Up to 64	4	$4^3 (4 \times 4 \times 4) = 64$ Therefore, cube root of 64 is 4.	Inspect 4 lots selected at random from the consignment. If more than 64 items in consignment, select 5 lots at random.
Up to 125	5	$5^3 (5 \times 5 \times 5) = 125$ Therefore, the cube root of 125 is 5	Inspect 5 lots selected at random from the consignment. If 126 or more lots in consignment, select 6 lots at random.

This framework provides a simple mathematical model for selecting a representative sample from consignments with multiple units from a same lot/batch. This simple mathematical formula can be extended to larger consignments as needed.

5. Work instruction 2: How to select a representative number of items from the whole consignment for detailed inspection

There are a number of simple steps to be taken to ensure a representative selection of items from the entire consignment is being inspected as needed.

STEP 1: Each line and lot/batch to be treated separately

Make sure each line in the consignment is considered and inspected separately and, where the consignment contains more than one lot/batch, treat each separately if a detailed inspection is required.

STEP 2: Random selection of lots for examination

Make sure that you select the items at random – select items from throughout the consignment (or lot/batch) from top, bottom, middle, front and back. Do not just select items from the product first seen when accessing the consignment.



Check lot numbers and ensure samples are collected across all packing houses.



Choose the units at random from the containers/pallets throughout the consignment. Ensure samples are not all collected from one location.

STEP 3: Selecting a representative sample

When the consignment consists of multiple lots (packages, bags, boxes) of the same product, to ensure inspection of a representative sample, the simple approach is to use the rule of cubes (Table 1) that sets out the minimum of lots needed to be examined based on the number of lots in the consignment

6. Collection of samples for laboratory testing

All samples collected from food import consignments for the assessment of microbiological or chemical contaminants are regulatory samples and must comply with mandatory food safety requirements). These samples must be collected, stored and transported, following this procedure for proper sample collection and submission.

The number and types of samples required to be collected from each consignment will vary depending on the specific tests and analyses required. The volume of sample is also related to the number of tests the sample may be subjected to.

It is important to note evidence that a range of potential food safety hazards have been shown to be associated with the specific commodity and that the biological contaminants and likely food safety pathogens will vary between different foods. For example, fish and fish products, may have risks from environmental contaminants such as heavy metals,. Some have natural allergens and toxicants associated with the commodity, or from contaminant organisms commonly found on the commodity.

It is important to have a general understanding of the specific potential food safety concerns that may be found in the specific commodity being inspected as this will influence the type of issues that need to be examined, and more importantly, the type of sample that may need further laboratory testing.

Since food safety hazards are often not evenly distributed in the commodity, randomly collect replicate samples to ensure an objective and scientifically accurate analysis. As a general rule, there should be 5 random samples drawn from the representative lots from the consignment. These may be combined into a composite sample which is then tested, or may be kept as individual samples and tested in parallel (*see, for example, the Australian imported food requirements at:*

- <http://www.agriculture.gov.au/import/goods/food/inspection-compliance/information-importers>
- <http://www.agriculture.gov.au/import/goods/food/inspection-compliance/risk-food>
- <http://www.agriculture.gov.au/import/goods/food/inspection-compliance/tests-applied-to-surveillance-category-foods>).

7. Work instruction 3: Collection and management of samples for laboratory testing

STEP 1: Preparation

Make sure you have the necessary laboratory sample submission form, sampling equipment (including sterile sampling equipment if microbiological samples required), sample containers (including sterile containers if required), sterile gloves (if needed), transport bags and transport equipment (boxes, cold boxes). Make sure that the inspector has been properly trained in sample collection and management.

Sample receipt form to be issued to importer with initials from both parties

STEP 2: Prevention of any contamination or potential cross contamination of samples

Check environment to ensure that there is no risk of contamination of the consignment or sample from debris or material from the general inspection environment. Maintain conditions that minimise the risk of cross contamination of the consignment or sample at all times. Make sure any surfaces are clean and wiped down with 70% alcohol to prevent cross contamination of equipment or the consignment or any of the samples as collected. Wear gloves, mouth cover if sterile sampling technique is required and replace gloves between sample collections if they come into direct contact with commodity.

STEP 3: Sampling technique – ensuring a random, representative sample

Five replicates are needed to get a representative sample. Select samples from different lots drawn from the consignment. Sample randomly from different parts of each lot and make sure that each lot is sampled. *Do not collect all samples from adjacent parts of a single lot being examined.*

STEP 4: Sampling technique – sample size

The National Food Testing Laboratory protocol document outlines what types of sample and the size of sample that may be needed (noting that sample size may need

to be increased if multiple tests are required. The recommended sample sizes are outlined in Table 2.

Table 2: Sample size required for microbiological or chemical analysis

Testing required	Number replicates	Wet or semi—liquid products	Dry food products	Meat	Comments
Microbiological tests	5	500 grams or Millilitres	500 grams*	500+ grams	Sterile samples – each kept separate. Must maintain cold temperature.
Chemical tests	5 (But may combine to form one composite sample)	500 grams or Millilitres	500 grams*	200+ grams	Non-sterile so may be combined but must be protected from contamination.

Note: For pre-packaged, 5 replicate samples can be submitted to NFTL with the request to analyse one composite sample.

**The sample size given is based on the assumption that all microbiological/chemical parameters are tested. Depending on the test parameters, sample quantity may differ (consult with NFTL).*

STEP 5: Sampling technique – Sterile technique for microbiological analysis

When sterile samples are needed for microbiological analysis, you must use sterile technique.

- Five replicate samples are needed and each should be kept separate.
- Use protective clothing, gloves.
- Sample with clean and sterile equipment and wash equipment with 70% alcohol between each sample collection.
- Place sample in sterile sample container (or medium as required) and place into cold storage to maintain temperature.
- Do not focus sample collection from the surface of the lot, but collect samples from within the lot.
- Do not breathe, sneeze or cough on the sample when it is collected.
- Maintain the integrity and condition of the sample at all times.

STEP 6: Sampling technique – non-sterile samples

For non-sterile samples, five replicates are needed but these may be combined into a composite sample.

- Protect consignment and samples from contamination during sampling
- Transport in bags or containers to prevent contamination or cross contamination

STEP 7: Documentation

Make sure to:

- Fill out the laboratory sample submission form
- Label every sample accurately (information for sample label-product name, collection date and time, sample, storage condition, sample collection location, batch no)
- Link labels and forms to the consignment details for later use
- Double check details to ensure accuracy

STEP 8: Dispatch samples to laboratory

If the samples can be tested through rapid screening facilities available at the entry points, send the samples for screening. Otherwise, dispatch to the National Food Testing Laboratory for analysis. Samples can be sent to the laboratory by courier, EMS or hand delivered till the lab to the following address:

Sample Reception Address:

Customer Relation Officer
National Food Testing Laboratory
Bhutan Agriculture and Food Regulatory Authority
Ministry of Agriculture and Forests
Yusipang, Thimphu, Bhutan
Mobile No: 17126736
Email: bafranftl@gmail.com

STEP 9: Record all laboratory test reports on the import record for the consignment
(reference no with laboratory database system)**STEP 10: Check results against the documentation received with the consignment.**

If the laboratory result shows a failure to meet the standard and requirements:

- Check certification and if the result is in conflict with the certification, inform the importer, the competent authority in the country of origin and the body providing the certification (laboratory etc.) for action to prevent a recurrence in future import consignments
- Identify the specific food and import pathway for targeted inspection in future

If the laboratory results indicate compliance with standards, record the result and no further action is required.

8. Work instructions for specific commodities or food groups

This section provides general work instructions for the inspection and sampling of different types of imported food consignments. These instructions may vary based on the conditions faced by the inspector when commencing the inspection.

***Note:** The inspector is the representative of BAFRA with direct access to the specific consignment being inspected. The inspector needs to have the right training, equipment and*

support in doing their inspection duties. They need support from both the team leader on site and from head office to assist where major issues or problems that have not previously been identified are found. BAFRA must trust the judgement of the inspector to make the decision on the ground.

This section has broad work instructions for the four main groups of food imports:

- Grain and dry goods.
- Raw and unprocessed fruits, vegetables and plant products.
- Animal derived foods (meat and meat products, fish and fish products, poultry, table eggs and dairy products).
- Processed pre-packaged foods and food ingredients.

BAFRA may need to adjust the work instruction based on the experience gained from inspection and assessment of imports into Bhutan. The basic facilities and equipments needed by inspectors for good inspection outcomes are as follows:

A. BASIC ENVIRONMENT FOR GOOD INSPECTION PROCEDURES

Core requirements are:

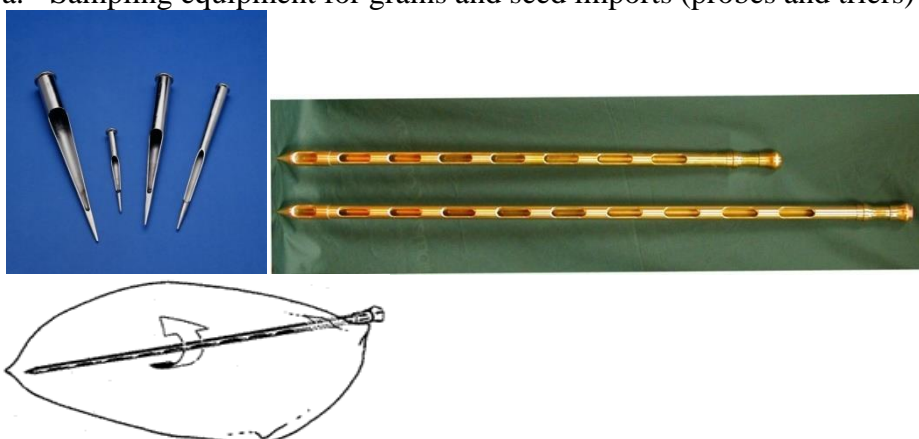
- a. Access to a good facility for inspection that allows for detailed inspection and opening of packaging for inspection and sampling as required. The facilities should allow for segregation of the consignment for detailed inspection and sampling. They should ensure that the inspection can be conducted in a manner that protects the integrity of the imported goods from potential contamination or damage.
- b. Cold room for detailed inspection of chilled or frozen consignments.
- c. Separate clean and well-lit room for detailed inspection and sampling of commodities where required.
- d. Clean bench or table surfaces for display and detailed examination of goods. In the interim, setting up a bench with an easily cleanable surface in the inspection area or use of white trays or trays lined with white paper can provide a suitable surface for detailed examination of product.
- e. Procedural and reference manuals, checklists and report forms (including capacity for electronic capture of findings once this capacity is developed).
- f. Basic inspection equipment.
- g. Equipment, media and sample containers for collection of samples for laboratory testing or for identification of pests and diseases. This includes the equipment for sample transport to the laboratory.
- h. Access to laboratory facilities for rapid screening where required, and to the National Food Testing laboratory if detailed confirmatory tests are needed.

***Note:** It is acknowledged that many of these facilities and requirements are not available at present but should be considered to be included in any future redevelopment of the border inspection posts.*

B. BASIC EQUIPMENT REQUIREMENTS FOR IMPORTED FOOD INSPECTIONS

It is important for the inspectors to have access to basic and core set of equipment to allow them to conduct inspections professionally and objectively. The list below identifies the some of the core equipment needed.

- a. Sampling equipment for grains and seed imports (probes and triers)



These equipment allow sampling of bulk or bagged grain and seed imports without having to unload or open each bag.

- b. Sieve set for sorting grain and seed samples to separate broken seed or contaminant weed seeds and soil for proper inspection of dry goods.



- c. Trays and paper insets used to enhance visibility for detailed examination of the items selected for detailed inspection.



- d. Magnification for detailed inspection of goods as needed



Hand lenses, with or without light sources, or magnification lamps are usually all that is needed for inspection of unpackaged food products. If detailed pest and disease assessment is needed, access to a binocular stereo microscope may be justified.

- e. Tweezers, brushes and probes for sorting seeds and for collection of samples of any observed pests or contaminants for identification (if needed).



A: Tweezers. B & C: Probes dissecting needles. D & E: Scalpels and knives for cutting fruit. Brushes of various sizes for sorting insects or other contaminants found.

- f. Weighing machines and scales



There are many portable hand held scales both mechanical and electronic, often used to weigh luggage, available for weighing packages and lots as needed. These may not give a scientifically valid weight when compared to a scientific bench scale, but can provide ready evidence of gross errors between the weight on the label and the actual weight of the product.

- g. Sample containers and collection vials



Inspectors should have general sample vials for collection and storage on non-sterile samples and specimens for further analysis, and sterile sample containers, transport packaging, sample submission forms etc for samples to be submitted to the laboratory for detailed testing.

h. Camera

A separate camera with macro- capacity, or a suitable smart phone, should be used to take images of any issues encountered at inspection both for building a record of problems and their resolution, and for developing training and education programs for staff, importers and the food industry.

Many of these pieces of equipment are relatively inexpensive and readily available. Such equipment can greatly enhance the inspector's capacity in assessing the imported consignment.

All entry points and inspectors must have access to the basic equipment in order to conduct inspections in a professional and consistent manner. All consignments are first inspected through the general visual inspection procedure for all import consignments (as stated in Part –I of this manual).

- Sample label stickers

9. Work instruction 4: Inspection of import consignments of grain and dry goods

A. PREPARATION FOR INSPECTION – DOCUMENTATION, EQUIPMENT AND FACILITY CHECKS

STEP 1: Check documentation (consignment details and certification-phytosanitary certificates, fumigation or treatment certificates) against the consignment details referred in the notification and labelling of the consignment.

STEP 2: Review history of imports to see if there have been any issues in previous import consignments.

STEP 3: Confirm whether there are any concerns notified from post market activities.

STEP 4: Confirm that the consignment is required to be inspected.

STEP 5: Make sure all equipment needed for inspection and sampling is available, in good working condition and clean. Ensure that the inspector is trained in the use of the equipment.

STEP 6: Ensure that the site for the inspection has the relevant facilities (benches etc.) which are clean and free of any potential contaminants that may contaminate the import consignment. Make sure that there are no issues that may impact the safety of the inspector. If any concerns are raised, discuss these with the officer in charge and the importer to see how these may be addressed so that the inspection can proceed with due safety.

STEP 7: Make sure that sample submission form, sampling equipment, sample containers and transport containers are available for collection and management of laboratory samples should this be required. If microbiological testing is needed, make sure that supplies of disinfectant (70% alcohol) is available to maintain sterility.

B. SELECTING A REPRESENTATIVE SET OF LOTS FOR DETAILED INSPECTION

STEP 8: Use the sampling procedure above to select specific items from the consignment for detailed inspection.

C. INSPECTION PROCEDURE

STEP 9: Use triers or probes to collect a random sample of grain/seed from each of the selected items (see basic equipment).

STEP 10: Combine samples into a composite sample for the consignment.

STEP 11: Put the composite sample through the sieve set and check each sieve level for evidence of soil contamination, weed or exotic seeds, broken or damaged seed. Record your findings as you go. Take photos of broken seed, weed seed or soil contamination found. If needed, weigh the different components to get a profile (by weight) of the sample and consignment.

DECISION: Does the consignment meet Bhutan requirements and if not, can it be re-conditioned and treated to allow entry into Bhutan?

STEP 12: Check grain and seed under magnification to see if there is obvious evidence of disease (fungal, bacterial or viral) present (take photos). If any infected grain seen, use tweezers to collect as many infected grain seeds as possible for laboratory assessment if needed. These should be collected, stored and transported in a sterile manner under conditions needed for laboratory testing.

Note: These samples will be collections of specific infected seed, so will not be a random sample.

DECISION: Does the product need to be sorted to remove infected seed or treated/fumigated prior to release?

STEP 13: Check grain and seed for presence of any stored grain pests. If present (take photos), collect samples for formal identification if needed and to develop a reference library of pests for future reference. Get advice on management of a reference collection from the appropriate authorities.

DECISION: Does the product need to be treated/fumigated before release?

STEP 14: If there is concern or evidence of possible pesticide residues or environmental contaminants, or if the commodity is part of a structures survey program, collect sub-sample from the composite sample (50 gm or so) into as sterile sample container for laboratory testing. This sample should be managed to prevent any possible contamination.

STEP 15: If there is a rapid test available at a screening laboratory at the entry point, the sample should be screened immediately. If not, samples should be submitted to the

National Food Testing Laboratory for analysis. The traceability of the import commodity should be checked with the importer.

STEP 16: Document the inspection outcome and findings including any laboratory testing. It may not be feasible to detain and hold consignment pending test reports, so goods should be released to the importer after inspection and application of any treatment, if required. However, adverse test reports may be used as evidence of the import pathway for stronger interventions in the future.

STEP 17: Document the adverse findings and inform the importer (and their supplier if possible) of findings including any laboratory test reports. The report should include advice to the importer that future imports will be checked and if further adverse findings are made, restrictions of imports from that source may be imposed. The same evidence and advice should be provided to the competent authority in the country of origin in order to assist them in management of commodities destined for export to Bhutan.

10. Work instruction 5: Inspection of import consignments of raw/unprocessed fruits, vegetables and plant products.

A. PREPARATION FOR INSPECTION – DOCUMENTATION, EQUIPMENT AND FACILITY CHECKS

STEP 1: Check documentation (consignment details and certification - phytosanitary certificates, fumigation or treatment certificates) against the manifest and labelling of the consignment.

STEP 2: Review history of imports to see if there have been any issues in previous import consignments.

STEP 3: Confirm whether there are any concerns notified from post market activities.

STEP 4: Confirm that the consignment is required to be inspected.

STEP 5: Make sure all equipment needed for inspection and sampling is available, in good working condition and clean. Make sure that the inspector is trained in the use of the equipment.

STEP 6: Ensure that the site for inspection has the relevant facilities (benches etc.) which are clean and free of any potential contaminants. Make sure that there are no issues that may impact the safety of the inspector on duty. If any concerns are raised, discuss these with the officer in charge and the importer to see how these may be addressed so that the inspection can proceed with due safety.

STEP 7: Make sure that sample submission form, sampling equipment, sample containers and transport containers are available for collection and management of laboratory

samples, where required. If microbiological testing is needed, make sure that supplies of disinfectant (70% alcohol) is available to maintain sterility.

B. SELECTING A REPRESENTATIVE SET OF LOTS FOR DETAILED INSPECTION

STEP 8: Select the lots for inspection according to the plan for ensuring that a representative sample of the consignment is inspected. Where the commodity is imported as bulk shipment (with no lot/batch), sample at least 20 individual pieces of the commodity for detailed examination.

C. INSPECTION PROCEDURE

STEP 9: Having selected the items for detailed examination, examine at least 20 individual pieces of the commodity to see if any signs of pests or diseases are present. If seen, take photos and collect samples for further analysis, if needed. (For biosecurity purpose, a much larger number of pieces may need to be examined).

STEP 10: If there are concerns about pesticide residues or environmental contaminants in the specific commodity originating from the export source, samples should be collected for testing. Five individual pieces of the product should be selected at random and forwarded to the laboratory for testing in a manner that protects the integrity of the product and prevents any contamination that may affect test results.

STEP 11: If the concerns are for biological contaminants (for example, faecal contamination of hand-picked spices such as pepper), five random samples of 500 grams each should be collected using sterile techniques, stored in sterile sample containers and forwarded to the laboratory for testing in a manner that protects the integrity of the sample. . The samples should be screened at the entry point laboratory using rapid screening tools prior to release of the consignment, if possible, otherwise send to National Food Testing Laboratory for analysis.

STEP 12: If specific commodity is selected for a survey of relevant pests, diseases and contaminants, then five randomly selected pieces should be forwarded to the National Food Testing Laboratory for testing. The samples should be managed to prevent any contamination or damage such that test results are not compromised.

STEP 13: Document the inspection outcome and findings including any laboratory testing. It may not be feasible to detain and hold consignment pending test reports, so goods should be released to the importer after inspection and application of any treatment, if required. However, adverse test results may be used as evidence of the import pathway for stronger interventions in future.

STEP 14: Document the adverse findings and inform the importer (and their supplier if possible) of findings including any laboratory test reports. The report should include advice to the importer that future imports will be checked and if further adverse findings are made, restrictions of imports from that source may be imposed. The same evidence and advice should be provided to the competent authority in the

country of origin in order to assist them in management of commodities destined for export to Bhutan.

11. Work instruction 6: Inspection of import consignments of animal derived foods (meat and meat products, fish and fish products, poultry, table eggs, and dairy products)

A. PREPARATION FOR INSPECTION – DOCUMENTATION, EQUIPMENT AND FACILITY CHECKS

STEP 1: Check documentation (consignment details and sanitary certification) - against the manifest (*written consignment description which is very obvious for commodities*) and labelling of the consignment.

STEP 2: Review history of imports to see if there have been any issues in previous import consignments.

STEP 3: Confirm whether there are any concerns notified from post market activities.

STEP 4: Confirm that the consignment is required to be inspected.

STEP 5: Make sure all equipment needed for inspection and sampling is available, in good working condition and clean. Make sure that the inspector is trained in the use of the equipment.

STEP 6: Ensure that the site for the inspection has the relevant facilities (benches etc.) which are clean and free of any potential contaminants that may contaminate the import consignment. Make sure that there are no issues that may impact the safety of the inspector. If any concerns are raised, discuss these with the officer in charge and the importer to see how these may be addressed so that the inspection can proceed with due safety.

STEP 7: Make sure that sample submission form, sampling equipment, sample containers and transport containers are available for collection and management of laboratory samples, where required. If microbiological testing is needed, make sure that supplies of disinfectant (70% alcohol) is available to maintain sterility.

B. SELECTING A REPRESENTATIVE SET OF LOTS FOR DETAILED INSPECTION

STEP 8: Visually inspect the consignment to see if there are any visible signs for damage to packaging or obvious spoilage, contamination or damage to the product. Check temperature and visually check for any signs whether the consignment has lost temperature controls in transit.

STEP 9: Select the lots for inspection according to the plan for ensuring that a representative sample of the consignment is inspected.

STEP 10: Maintain temperature controls as this will impact any subsequent testing for biological contaminants. Always handle import commodities with care to avoid any potential contamination with bacteria or other organisms.

C. INSPECTION PROCEDURE

STEP 11: Having selected the lots for detailed examination, examine each selected lot individually. See if there are any obvious signs of spoilage (smell, loss of structural integrity, discoloration). If so, take photos and collect samples for further analysis, if needed.

DECISION: Does this product meet Bhutan's requirements?

STEP 12: Samples should always be collected in a sterile manner with at least 5 samples taken at random from different lots and or parts of the consignment being inspected. Collect samples from the centre of the item rather than from the outer surface. Maintain the five samples as separate samples to avoid cross-contamination.

STEP 13: If available at the entry point, use the rapid screening testing to determine the status of the product. Submit samples to the National Food Testing Laboratory for diagnostic and confirmatory testing, as required. Remember to maintain sterility and the cold chain for all such samples to avoid bacterial growth that may invalidate the subsequent test results.

STEP 14: Where specific surveys are being undertaken, the sterile samples should be forwarded to the National Food Testing Laboratory for testing under sterile and cold chain procedures.

STEP 15: Document the inspection outcome and findings including any laboratory testing. It may not be feasible to detain and hold consignment pending test reports, so goods should be released to the importer after inspection and any treatment applied. However, adverse test results may be used as evidence of the import pathway for stronger interventions in future.

STEP 16: Document the adverse findings and inform the importer (and their supplier if possible) of findings including any laboratory test reports. The report should include advice to the importer that future imports will be checked and if further adverse findings are made, restrictions of imports from that source may be imposed. The same evidence and advice should be provided to the competent authority in the country of origin in order to assist them in management of commodities destined for export to Bhutan.

12. Work instruction 7: inspection of import consignments of processed pre-packaged foods and food ingredients

A. PREPARATION FOR INSPECTION – DOCUMENTATION, EQUIPMENT AND FACILITY CHECKS

STEP 1: Check the documentation (consignment details and certificates) against the manifest and labelling of the consignment.

STEP 2: Review history of imports to see if there have been any issues in previous import consignments.

STEP 3: Confirm whether there are any concerns notified from post market activities.

STEP 4: Confirm that the consignment is required to be inspected.

STEP 5: Make sure all equipment needed for inspection and sampling is available, in good working condition and clean. Make sure that the inspector is trained in the use of the equipment.

STEP 6: Ensure that the site for the inspection has the relevant facilities (benches etc.) which are clean and free of any potential contaminants that may contaminate the import consignment. Make sure that there are no issues that may impact the safety of the inspector. If any concerns are raised, discuss these with the officer in charge and the importer to see how these may be addressed so that the inspection can proceed with due safety.

STEP 7: Make sure that sample submission form, sampling equipment, sample containers and transport containers are available for collection and management of laboratory samples, where required. If microbiological testing is needed, make sure that supplies of disinfectant (70% alcohol) is available to maintain sterility.

B. SELECTING A REPRESENTATIVE SET OF LOTS FOR DETAILED INSPECTION

STEP 8: Visually inspect the consignment to see if there are any visible signs for damage to packaging or obvious spoilage, contamination or damage to the product (Take photos).

STEP 9: Check documentation (food safety certificates, HACCP certificates and other documentation) against the manifest and labelling of the consignment to confirm identity.

DECISION: Does the consignment meet Bhutan's requirements?

STEP 10: Select the lots for inspection according to the plan for ensuring that a representative sample of the consignment is inspected.

C. INSPECTION PROCEDURE

STEP 11: Having selected the lots for detailed examination, the main checks in these products are for packaging integrity, product identity, and compliance with Bhutan food standards. Check for illegal or unapproved additives and ingredients. Check date marking (best before/expiry dates).

STEP 12: Check for any certification associated with the consignment (safety and HACCP certificates).

***Note:** Additional testing of such products at the border for contaminants (physical, chemical or biological) is generally not carried out as these should have been managed in the production/manufacturing stage.*

STEP 13: If there is evidence from international food regulators, or from domestic post market programs that indicate any concerns with the specific imported food, take relevant samples (whole packets) for further laboratory analysis. As these are shelf stable products, no specific sample management and transport requirements should be needed.

STEP 14: Consumer fraud and deception issues need to be considered as these can undermine confidence in the food supply. Products of inferior quality represented as high value products should be rejected.

DECISION: Is the presentation of the consignment and product fraudulent?

If YES, then:

1. Packaged products that are fraudulent (mislabelled, underweight, adulterated, etc.) must be recorded in the import database and inform the suppliers/importers and inform the Office of Consumer Protection.
2. Inform importer as it may be quality issues requiring follow up with the suppliers/importers.

STEP 15: Document the inspection outcome and findings including any laboratory testing. It may not be feasible to detain and hold consignment pending test reports, so goods should be released to the importer after inspection. However, adverse test results may be as evidence of the import pathway for stronger interventions in future.

STEP 16: Document the adverse findings and inform/notify the importer (and their supplier if possible) of findings including any laboratory test reports. The report should include advice to the importer that future imports will be checked and if further adverse findings are made, restrictions of imports from that source may be imposed. The same evidence and advice should be provided to the competent authority in the country of origin in order to assist them in management of commodities destined for export to Bhutan.

ANNEXURE I: Running list for high risk foods subject to targeted inspection

Product name check in Customs data for history	Importer	Exporter if known	REASON FOR TARGETED INSPECTION		NUMBER OF CLEAR INSPECTION RESULTS – Any failure, restarts count at 1 for next import. After 10 successive clear imports, move food to routine inspection schedule									
			NEW PRODUCT	FAILURE RECORDED - DETAILS	1	2	3	4	5	6	7	8	9	10

ANNEXURE II: Running list for medium risk foods subject to targeted inspection

Product name check in Customs data for history	Importer	Exporter if known	REASON FOR TARGETED INSPECTION		NUMBER OF CLEAR INSPECTION RESULTS – Any failure, restart count at 1 for next import. After 5 successive clear imports, move food to routine inspection schedule				
			NEW PRODUC T	FAILURE RECORDED - DETAILS	1	2	3	4	5

(SOP for destruction)

Sampling tool bags
Gun thermometer

ANNEXURE III: Running list for low risk foods subject to targeted inspection

Product name check in Customs data for history	Importer	Exporter if known	REASON FOR TARGETED INSPECTION		NUMBER OF CLEAR INSPECTION RESULTS – Any failure, restart count at 1 for next import. After 3 successive clear imports, move food to routine inspection schedule		
			NEW PRODUCT	FAILURE RECORDED – DETAILS	1	2	3