

PRACTICAL REFORM GUIDE

Right-Sizing the Rules: A Risk-Proportionate Food-Safety Certification Tier for Micro Agro-Processors

A sample of the final product — illustrated with a fictional country

REFORM

R3

COUNTRY

**Country A
(fictional)**

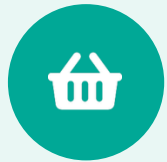
MARKET MATURITY

Frontier

INSTRUMENT

Amendment to the Food Safety Regulations, made by the Minister under the existing Food Safety Act — no primary legislation required

Sector opportunity and constraint addressed



SECTOR OPPORTUNITY

Country A's dried-fruit and spice micro-processors experience growing urban and cross-border demand. Supermarket chains, exporters, and institutional buyers are actively seeking domestic supply, but will contract only with certified processors.



CONSTRAINT ADDRESSED

The Food Safety Regulations apply one certification standard to every processor regardless of scale or product risk: dedicated purpose-built premises, an industrial fit-out specification, routine end-product testing at the national reference laboratory, and an annual audit fee set for factories. At micro scale the compliance cost exceeds annual turnover.

What

Amend the Food Safety Regulations to establish a risk-proportionate certification tier for micro-scale processors of low-moisture, shelf-stable products.¹ The tier does not lower the food-safety objective; it substitutes controls that address the hazards which actually apply at this scale and for this product class, for controls designed around industrial plant:

-  a published hygiene and process code for low-moisture products — sourcing, drying, water-activity control, sanitation, and a validated process step — in place of the industrial premises specification;
-  documented batch records and a process-control plan, with risk-triggered and periodic verification sampling retained, in place of routine end-product testing at the national reference laboratory;
-  inspection and certification by trained, accredited district-level inspectors of the National Food Safety Authority, in place of central audit only;
-  a fee scaled to turnover.

Certification under the tier carries the same legal standing for supply to the domestic formal market, with a defined upgrade pathway to full certification for export.²

Why

Formal buyers in Country A will not contract with uncertified suppliers, and lenders will not finance them. Because the single standard is unattainable at micro scale, thousands of processors are excluded from the buyers who would pay for their volume and remain in an informal supply chain that the regulator cannot see. The current regime therefore fails twice: it does not deliver market access, and it does not deliver oversight.



A proportionate tier converts an excluded informal segment into a regulated, traceable, financeable supply base. It is a change to the substance of the rule, not to the speed of a counter.

Recipients & stakeholders

Intended recipient	Ministry of Health — National Food Safety Authority (fictional)
Lead implementer	National Food Safety Authority, Standards & Certification Division, with district health offices
Coordinating actors	Ministry of Trade and Industry (Department of Enterprise Registration); national accreditation body; National Smallholder & Agro-Processors’ Association; supermarket and exporter buyer group; consumer association
Sign-off authority	Minister of Health, by regulation, on the advice of the National Food Safety Authority, after statutory public consultation — no cabinet or parliamentary action required
Prerequisites	None in law. In practice, district inspection capacity must be built in parallel so that it exists on the day the regulation commences.

Linked intermediate action



09:00–15:00

District registration office hours,
weekdays — precisely the hours micro-
processors are at farm or market

R1 • Re-time district business-registration office hours

Certification under the new tier requires the processor to hold a business registration. In Country A, district registration offices open 09:00–15:00 on weekdays — precisely the hours micro-processors are at farm or market — so registering costs one to two days of travel and lost income. Left unaddressed, the new tier would be legally available and practically unreachable.

Re-timing those hours is an administrative procedure, not a substantive reform, and would not stand on its own as a policy action. It belongs in the program as a critical intermediate step toward R3, sequenced to complete before the regulation commences. The method surfaces dependencies of this kind precisely so that they are not discovered late.

How — four moves

1

Build the evidence base for proportionality.

A joint National Food Safety Authority and processors' association risk assessment of the low-moisture product category: which hazards genuinely apply, and which of the current industrial controls are and are not risk-relevant at this scale. This is the document that makes the amendment defensible to the health ministry and the consumer association, and it is the move most often skipped.

2

Draft the tier and run statutory consultation.

Publish the draft tier standard and hygiene code; consult processors, district health offices, consumer groups, and — critically — the buyers. A tier that supermarkets and exporters decline to recognize delivers nothing, so buyer sign-off is a design requirement, not a courtesy.

3

Build inspection capacity, and clear the enabling actions, in parallel.

Train and accredit district-level inspectors; issue the inspection manual; designate the district offices. Enact the linked registration re-timing (R1) in the same window so that the pathway is complete on commencement day.

4

Commence in phases, then review.

Phase in across three districts, then nationally. Review at twenty-four months against the indicators below — including the food-safety counter-indicator — before the national rollout decision is confirmed.

What success looks like

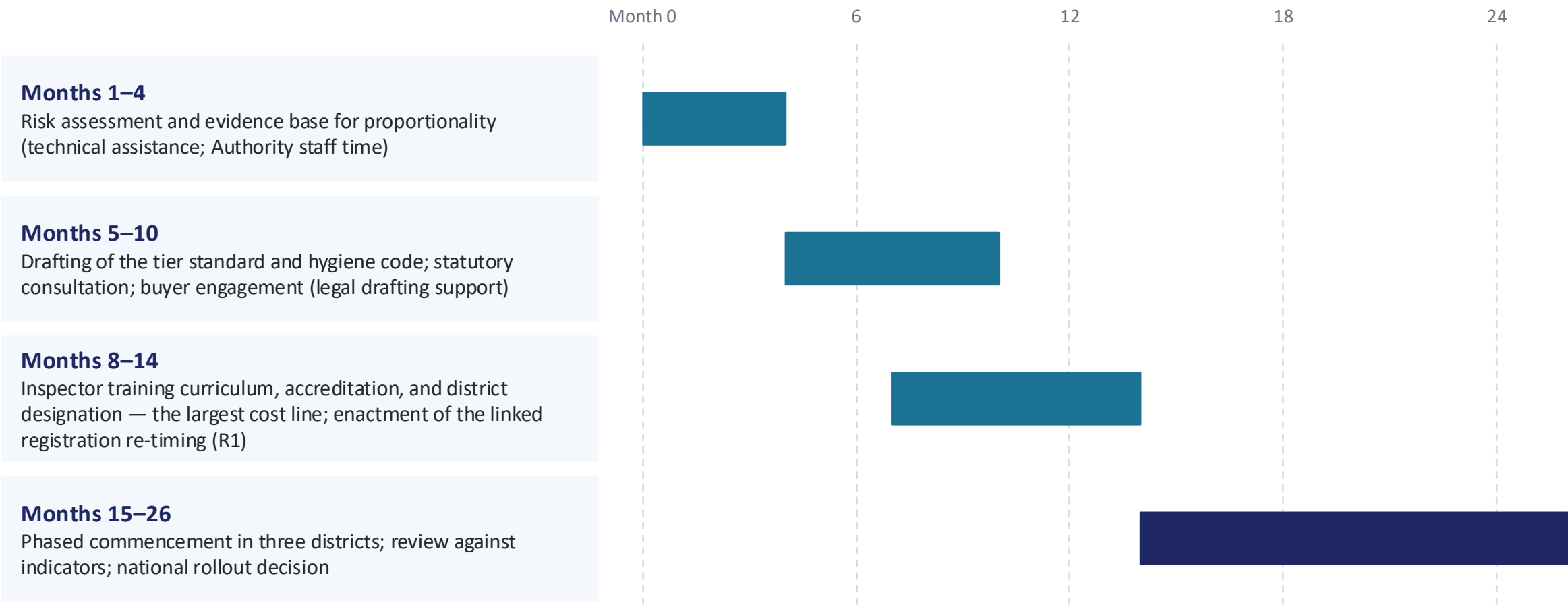
- ✓ Micro-processors certified under the new tier (uptake).
- ✓ Median cost and elapsed time to certification at micro scale, before and after.
- ✓ Share of newly certified micro-processors holding at least one formal buyer contract or approved loan within eighteen months — the link from certification to investment.
- ✓ Volume of the product category entering traceable formal supply chains.



COUNTER-INDICATOR

Reported food-safety incidents in the category. The reform is designed to hold safety constant while removing scale-inappropriate cost. If incidents rise, the tier is wrong and must be revised.

Resources & time



Risks & assumptions



RISKS

- the health ministry or consumer association reads proportionality as deregulation, and the amendment stalls in consultation — mitigated by leading with the risk assessment and publishing the counter-indicator;
- district inspection capacity lags the regulation, leaving a tier that exists on paper only;
- buyers decline to recognize the tier, making certification commercially worthless;
- a change of minister stalls the regulation mid-consultation.



ASSUMPTIONS

- certification is genuinely the binding constraint on formal-market access, rather than aggregation and cold-chain logistics (candidate reform R7, currently low-confidence);
- the low-moisture category can be shown on the evidence to carry materially different risk from wet processing; and
- the parent Food Safety Act delegates standard-setting to regulation broadly enough to permit tiering without amendment of the Act itself.

This last assumption is checked first — if it fails, R3 moves to the watch zone.

Notes

- 1 The tiering approach illustrated here follows established international practice rather than any single country's regime. Codex Alimentarius, General Principles of Food Hygiene (CXC 1-1969, revised 2020 and 2022), expressly encourages flexibility in applying HACCP to small and/or less-developed food businesses, taking account of the nature of the operation, its resources and practical constraints, and the food-safety risk involved. FAO/WHO, Guidance to Governments on the Application of HACCP in Small and/or Less-Developed Food Businesses (FAO Food and Nutrition Paper 86, 2006), provides governments with practical policy and implementation approaches for applying that flexibility.
- 2 Risk-based tiering is not confined to developing regulatory systems. In Japan, the Food Sanitation Act requires, in principle, all food business operators to implement food hygiene control based on HACCP principles, while allowing small-scale operators and certain food sectors to use a simplified HACCP-based approach through sector-specific guides prepared by industry associations with support from the Ministry of Health, Labor and Welfare.