SAFEGRO

FOOD SAFETY CERTIFICATION IN VIETNAM

Gap Analysis and Assessment of the Status of Food Safety Management Systems & Certification

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About the project

Funded by Global Affairs Canada, the SAFEGRO project seeks to enhance the Vietnamese people's access to safe and competitive agri-food products, to improve the well-being of consumers and other agri-food actors. Alinea International implements the SAFEGRO project with the University of Guelph, focusing on Han Noi and Ho Chi Minh City value chains.

Food safety is a significant public health concern. Recent research indicates that Vietnamese consumers do not trust food safety practices and enforcement at informal markets where they buy most food. Trade for Vietnam's commodity exports also suffers due to a lack of compliance with international standards.

SAFEGRO project works with national and municipal governments to modernize food safety capacity among regulators, thousands of smallholder farmers, cooperatives, processors, retailers and consumers along specific meat and vegetable value chains in Ha Noi and Ho Chi Minh City. SAFEGRO supports Vietnam's Ministry of Agriculture and Rural Development, Ministry of Health and Ministry of Industry and Trade jointly.

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LIST OF ACRONYMS AND ABBREVIATIONS

ASEAN	Association of Southeast Asian Nations
AWP	Annual Work Plan
BAP	Best Aquaculture Practices
BoA	Bureau of Accreditation
BRC	British Retail Consortium / Global Standard for Food Safety
BRCGS	British Retail Consortium Global Standards
BSI	British Standards Institute
CA	Competent Authority
CAO	Certification and Auditing Organisation
CBs	Certification Bodies
CCP	Critical Control Point
CEA	Canadian Executing Agency
CEN/CENELIC	European Standards Commission
CODEX	Codex Alimentarius, or "Food Code"
COC	Chain Of Custody
CPD	Crop Production Department
CPO	Certification Program Owner
DARD	Department of Agriculture and Rural Development
DLP	Department of Livestock Production
DOIT	Department of Industry and Trade
EEC	Council Regulations of the European Union
ETI	Ethical Trade Initiative
EU	European Union
FAO	Food and Agriculture Organization
FBO	Food Business Operators
FDA	Food and Drug Administration (US)
FS	Food Safety
FSL	Food Safety Law
FSMA	Food Safety Management Authority (Vietnam)
FSMA	Food Safety Modernization Act (USA)
FSMB	Food Safety Management Board
FSMS	Food Safety Management System
FSSC	Food Safety Systems Certification
GAC	Global Affairs Canada
GAP	Good Agricultural Practices
GATT	General Agreement on Tariffs and Trade
GBVCAs	Gender-Based Value Chain Assessments
GFSI	Global Food Safety Index
GFSI	Global Food Safety Initiative
GGN	GlobalGAP Number

GLN	Global Location Number
GMP	Good Manufacturing Practices
GSP	Good Standardisation practices
HACCP	Hazard Analysis Critical Control Points
HCMC	Ho Chi Minh City
IAF	International Accreditation Forum
IFOAM	International Federation of Organic Agriculture Movements
IFS	International Food Standard
ILO	International Labour Organisation
ISO	International Standards Organization
ISWG	Inter-sectoral Working Group
ITC	International Trade Centre
ITU	International Telecommunications Union
LPD	Livestock Production Department (MARD)
MARD	Ministry of Agriculture and Rural Development
MOH	Ministry of Health
MOIT	Ministry of Industry and Trade
MOST	Ministry of Science and Technology
n.d.	No date available
NAEC	National Agriculture Extension Centre
NAFIQPM	National Agro-Forestry-Fisheries Quality Product Management
NASA	North American Space Agency
NBC	National Barcode Centre
NFCS	National Food Control System
NIFC	National Institute of Food Control
NOP	National Organics Program
NQI	National Quality Infrastructure
PARD	Provincial Department of Agriculture and Rural Development
PDCA	Plan-Do-Check-Act
PGS	Participatory Guarantee Systems
PPD	Plant Protection Department (MARD)
PRPs	Prerequisite programs (precursor to HACCP)
PSDU	Public Service Delivery Unit
QCDP	Local Technical Regulation
QCVN	National Technical Regulation
QMS	Quality Management System
QUACERT	Vietnam Certification Center
SAFEGRO	Safe Food for Growth Project
SEDEX	Supplier Ethical Data Exchange
SFCA	Safe Food for Canadians Act
SMETA	Sedex Members Ethical Trade Audit
STAMEQ	Department of Standards, Meteorology, and Quality (MOST)

SWOT	Strengths, Weaknesses, Opportunities and Threats
TA	Technical Assistance
TBT	Technical Barriers to Trade
TCCS	Base National Standard
TCVN	Tiêu chuẩn Việt Nam, lit. 'Standards of Viet Nam' (Voluntary)
ToT	Training of Trainers
TS	Technical Standard
UK	United Kingdom
UoG	University of Guelph
USDA	United States Department of Agriculture
VC	Value Chain
VFA	Vietnamese Food Agency
VIAS	Vietnam Inspection Accreditation Scheme
VICAS	Vietnam Certification Accreditation Scheme
VietGAP	Vietnamese Good Agricultural Practices
VILAS	Vietnam Laboratory Accreditation Scheme
VND	Vietnamese Dong
VNTP	Vietnamese National Traceability Portal
vTPA	Voluntary Third-Party Assurance Program
WB	World Bank
WGs	Working Groups
WHO	World Health Organization
WTO	World Trade Organization

EXECUTIVE SUMMARY

This report provides an in-depth examination of food safety certification in Vietnam, including topics such as the process for obtaining certification under VietGAP, HACCP, ISO2200, and other domestic standards, as well as comparisons to recognised international standards and certifications.

This review was conducted considering internationally recognised food safety standards such as CODEX Alimentarius, Hazard Analysis and Critical Control Points (HACCP), and International Standards Organization (ISO), as well as other voluntary third-party assurance (vTPA) Programs relevant to today's global agri-food supply ecosystem. The report provides context for why these standards are critical drivers of food safety, as well as the governance recommended for their implementation in Vietnam and compliance with international best practices with the assistance of SAFEGRO.

The legal and legislative framework, as well as the procedures for food safety certification, are complex, administratively onerous, expensive, and time-consuming. Multiple regulations are intertwined and include redundant requirements for food safety certification compliance, and multiple line ministries and auditing bodies are involved in redundant enforcement processes.

To establish National TCVN (voluntary) standards that will be approved by legislative guidelines, a lengthy process must be followed. The Ministry of Standards, Meteorology, and Quality (STAMEQ) then manages and approves the standards, requiring additional administrative approval steps to the approval and accreditation process.
This legislative compliance process makes it challenging to take a more proactive approach to certification and managing non-conformities.

The certification team conducted participatory surveys, interviews, and a comprehensive desk review on GAP analysis on food safety management systems and subsequent certification throughout the entire value chain (VC), beginning at the farm level and continuing through harvest, primary processing, wholesale markets, and retail establishments. The scope of the review included current practises outlined in National Standards (TCVNs), as well as Good Agricultural Practice (Basic GAP), a variety of VietGAP schemes, potential upgrades of VietGAP standards and schemes based on CODEX Alimentarius (CODEX), Hazard Analysis and Critical Control Points (HACCP), and ISO 22000 standards for food safety. It identified entry points and gaps for incorporating additional environmental and sustainability criteria and indicators to promote the use of such schemes and certification for small-scale farming, processing systems, and other key value chain actors in a more sustainable manner. The review was carried out with reference to complementary standards and schemes that are already aligned with the international standards that are currently in use in Vietnam (i.e., GlobalGAP, GFSI, PGS, BRC, and IFS), as well as a specific reference to the supplementary compliance requirements of domestic and international retailers and buyers, where applicable.

The VietGAP programme has been applied to a range of crops across the country since 2008, which includes vegetables, fruit, tea, coffee, and rice. There were no official statistics about the number of

farmers who had adopted VietGAP available at the time of writing, <u>but the adoption rate has generally been accepted as being very low and not universally applied.</u> Annex F provides a comprehensive treatment of the socio-economic constraints for smallholder farmers to implement certification schemes, an issue which needs to be seriously addressed. Reports from MARD (2014), for example, indicate there were some 7,557 ha of vegetables, 11,027 ha of fruit; 7,554 ha of rice; 5,644 ha of tea; and 124 ha of coffee grown that complied with VietGAP requirements (Cultivation Department, 2015). These crop areas represent some 0.08%, 1.35%, 0.01%, 4.19% and 0.02% of the total area in each crop production, respectively (Cultivation Department, 2015), indicating that a small number of farmers have adopted VietGAP since its introduction in 2008. Farmers' uptake of VietGAP requires changes to the socio-technical paradigm of the traditional agri-food system and many farmers did not adopt VietGAP because of 1) a lack of market demand for VietGAP-certified vegetables, 2) the risks associated with breaking informal institutions between farmers and preferred collectors; and 3) a lack of capability in key value chain actors (Hung Gia Hoang, 2018).

The assessment recognised the challenges associated with field terminology standardisation, making it difficult to ensure that all relevant stakeholders and value chain actors can clearly communicate the requirements for compliance with food safety certifications and interpretation of the standards. Moving forward, it is critical that the English to Vietnamese translations of sections of the document, specifically those about conformity assessment and certification, receive much attention and consideration.

The report presents key findings and provides recommendations to:

- Specify the administrative procedures for accreditation and certification to ensure adequate openness, trust in the process, and credibility of the designated certifications.
- Support the robust digitalization of food safety certification systems to reduce administrative burdens and provide clarity to end users and consumers.
- Implementation of unique identifiers for all types of food safety certifications.
- Support VietGAPs' alignment with international standards, including any revisions required to support its equivalence and the international benchmarking process.
- Promoting a distinctive, unified logo for the VietGAP system in recognition of a more robust and transparent certification process that aligns with International Standards.
- Consider modifying the current administrative accreditation and certification processes to facilitate wider adoption of VietGAP.

Participatory consultation among various stakeholders in the standard-setting process is crucial to ensure the standard does not discriminate against specific producers or processor groups or create unattainable compliance requirements. Additionally, standard requirements should never include unnecessary criteria or become overly restrictive to achieve the standard's objective – safe food.

Another set of criteria required for recognition of a particular certification program or benchmarking against other schemes requires that the certification system be supported by a credible management and governance structure to ensure the integrity of the program implementation and provide for verification, validation of all certificates and transparent databases readily accessible by end users to confirm validity of certification and competency of the auditing bodies.

1   INTRODUCTION

The activity is in support of those defined in the Project Implementation Plan (PIP) and Annual Work Plan (AWP) of the SAFEGRO project specified under Immediate Outcome 1210 for an activity 1223.1   to provide Analysis and assessment of the status of food safety management systems (GAP, HACCP, ISO 22000 recommendations for harmonization to international standards)

The report provides context, rationale, and recommendations for specific project interventions and activities to improve Vietnam's food safety certification system(s).

2   METHODOLOGY

The international and national consultants collaborated under the supervision of the CEA and with the support of the SAFEGRO Intersectoral Working Group (ISWG). The team conducted desk research and related analyses to investigate the food safety certification system, its use, and what areas need improvement. Fieldwork and consultations with key stakeholders in the selected value chains were required to identify challenges and opportunities for the most applicable management systems, data collection, and technology for establishing a dependable certification system to support risk-based food safety management, including reporting, monitoring, and promoting consumer confidence in safe food. During the engagement with key stakeholders, the team also provided a preliminary introduction and awareness-raising by an international expert and collected information to support competency-based training, which will include webinars and/or seminars, for critical ministry partners to ensure consistency of expectations and mutual understanding of existing certifications and options for improvements.

2.1   The Stakeholders

Table 1: Stakeholders interviewed during the GAP analysis process. (Full List found in Annex B)

MARD	MOST	National Certification Bodies	International Certification Bodies	Establishments
NAFIQPM CPD LPD Directorate of Fisheries PPD	Directorate of Standards, Metrology and Quality (STAMEQ) Vietnam Certification Center (QUACERT) National Barcode Center (GS1) Bureau of Accreditation (BoA)	Vina Cert Hanoi Agri Cert	BSI GlobalGAP	Six establishments See Annex B

2.2   Value Chain Selection

The SAFEGRO project undertook a concurrent Gender-based Value Chain Assessment (GBVCA) in selected value chains, the findings from which were integrated into this report. The team conducted extensive surveys and interviews in Hanoi's vegetable and pork value chains and HCMC's vegetable and fisheries value chains. Food safety certification issues were incorporated into the GBVCA, evaluating the process from scheme conception to authoritative line ministries, accreditation and authorisation of certification bodies, audits against the scheme, their control and governance, and end-user willingness, including farmer willingness-to-pay.

3   INTERNATIONAL FOOD SAFETY CERTIFICATION FRAMEWORK

Annex A provides a comprehensive treatment of the "International Food safety Certification Framework". Most countries have adopted the CODEX-based[1] national food safety certification standards, but many non-regulatory third-party food safety certification schemes, known as vTPA, have emerged over the last two decades and are frequently a specific requirement for buyers in Vietnam and internationally. The major global food industry players make extensive use of vTPAs. Public-based food safety management systems (FSMS) (ISO 9001:2015, HACCP, and ISO 22000:2018) and industry-based FSMS and schemes benchmarked under the Global Food Safety Initiative are examples (GFSI). Despite this, implementing diverse FSMSs has not met the expectations and problems that have been raised over the years to address the requirements for domestic food safety in Vietnam as well as access to global agri-food supply chains. (Escanciano and Santos-Vijande, 2014; Macheka et al., 2013).

Efforts were launched in the early twentieth century to develop and harmonise standards. The British Standards Institute (BSI) was the first standardisation body, established in 1901. The International Organization for Standardization was founded by the British Standards Institution (ISO). The local flexibility of certification programmes versus their global credibility is a significant issue and challenge for any standardisation effort.

Participatory consultation among various stakeholders in the standard-setting process is crucial to ensure the standard does not discriminate against specific producers or processor groups or create unattainable compliance requirements. Additionally, standard requirements should never include unnecessary criteria or become overly restrictive to achieve the standard's objective – safe food.

Another set of criteria required for recognition of a particular certification program or benchmarking against other schemes requires that the certification system be supported by a credible management and governance structure to ensure the integrity of the program implementation and provide for verification, validation of all certificates and transparent databases readily accessible by end users to confirm validity of certification and competency of the auditing bodies.

Recent research findings indicate that the most significant barrier to effective food safety management systems is the absence of and enforcement of necessary programmes exacerbated by a lack of awareness of HACCP (Baş and colleagues, 2007). Prerequisite programs (PRPs) and Good Manufacturing Practices (GMPs) need to be in place before an effective FSMS, HACCP can be implemented (HACCP Principles & Application Guidelines | FDA, n.d.).

Food safety certification standards generally fall into tow categories: (i) Those administered by government regulatory agencies, usually mandatory standards, supported by rules, guidelines, or definitions to ensure that materials, products, processes, and services meet mandatory requirements, and (ii) a set of voluntary third party assurance (vTPA) "specifications" agreed to by industry partners, organizations or required by buyers as requirements for commercial purposes but which may be endorsed for equivalency by government agencies.

3.1 The Codex Alimentarius

The Codex Alimentarius[2], or "Food Code", is a collection of standards, guidelines and codes of practice adopted by the Codex Alimentarius Commission (Codex) aligned with the WTO. It includes a collection of internationally adopted food standards and related texts intended to protect consumers' health and ensure fair agri-food trade practices. Many governments imbed the Codex Alimentarius in their food safety regulations. The Codex includes standards for all the principal foods, whether processed, semi-processed or raw, for distribution to the consumer. Ingredients, additives, and materials for further processing into foods should be included to the extent necessary to achieve the purposes of Codex as defined. The Codex includes provisions regarding food hygiene, food additives, pesticides and veterinary drug residues, contaminants, labelling and presentation, methods of analysis and sampling, and import and export inspection and certification.

3.2 HACCP

Hazard Analysis and Critical Control Points (HACCP) is an internationally recognised set of principles for identifying hazards, assessing risks, and ultimately mitigating food safety risks. HACCP is used worldwide as the Food Safety Management System by a wide range of food business operators (FBOs) and is endorsed by government, in some cases mandatory, to ensure that all the food they produce is safe.

HACCP is a systematic approach to the hazard identification, characterization, evaluation, and control of food safety hazards based on the seven fundamental principles and 12 steps, regardless of where it is applied. See Annex A for details.

3.3 Prerequisite Programs (PRPs)

Prerequisite programs (PRPs) serve as the sanitary basis for all food activities. In various regions of the world, the terms PRPs, Good Manufacturing Standards (GMPs), Good Hygienic Practices (GHPs), and sanitary standard operating practises (SSOPs) are interchangeable but convey the exact definition (Figure 2). These provide the pre-conditions for an effective HACCP program and other FSMSs.

Figure 1: Prerequisite programmes (PRPs) adapted from What is a management system?
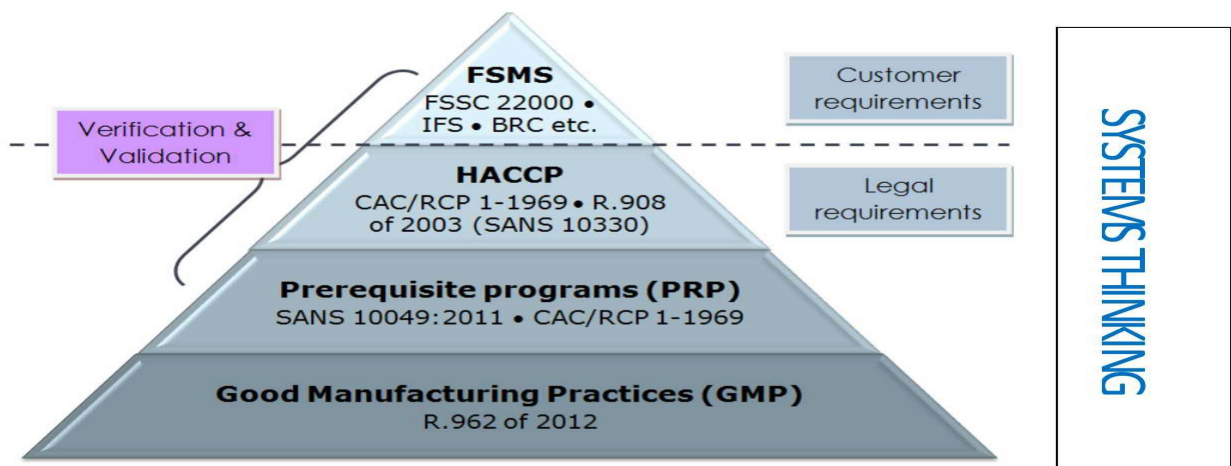
Figure 2: Adapted from Prerequisite Programs Ensure Food Safety.

PRPs are defined by the World Health Organisation (WHO) as "important food safety procedures that must be carried out prior to and during HACCP implementation. "The manufacture of safe food necessitates that the HACCP system be built on a solid foundation of PRPS to simplify the complexity of the HACCP plan and ensure that a supplier verification mechanism is in place. The WHO defines PRPs as "important food safety procedures that must be undertaken before and during HACCP implementation[3]."

3.4 ISO Food Safety Standards

The British Standards Institute (BSI) released the first standard for the United Kingdom in 1971 under BS 9000, but it wasn't until the 1980s that the International Organization for Standardization (ISO) began incorporating the UK's standards into their international certification guidelines and requirements with the first version of ISO 9000 (1987). Since then, there has been a gradual shift from end-product testing to a more proactive approach that employs risk-based food safety management systems to enable preventative measures and increase trust and transparency throughout the supply chain.

ISO 9001:1987 had a tight structure with twenty requirements, but ISO 9001:2000 resolved some problems and sought to create a standard focused on the growth of the business and the development of a Food Safety mindset. Rather than hefty manuals and documents dictating the running of a Quality Management System (QMS), the day-to-day operations dictated the documentation. This third edition of ISO 9001 was intended as a quality management "system" with carefully audited documentation to verify that the food safety management process is running effectively, on the basis of eight fundamental principles (see Annex A for details. With the development of ISO 9001:2015, over one million organisations worldwide have achieved ISO 9001 certification, making it one of the world's most widely used management tools. For example, the UK, the USFDA Food Safety Modernization Act (FSMA), and the Canadian Safe Food for Canadians Act (SFCA), have emphasized this risk-based preventative controls in auditable food safety management systems.

ISO 22000 is the most widely applied voluntary international food safety standard in the food industry, with 42,937 sites certified (ISO Survey 2021). The ISO 22000 family is an international voluntary consensus standard which aligns with Good Standardization Practices (GSP)[4] and the World Trade Organization (WTO) Principles for the Development of International Standards[5], defining the requirements for a Food Safety Management System (FSMS). Communication along the food chain is essential to ensure that all relevant food safety hazards are identified and adequately controlled at each step within the food chain.

ISO 22000 has two Plan-Do-Check-Act (PDCA) cycles, which operate inside each other, the first covering the management system and the second the operations (described in ISO 22000:2018, Clause 8), which simultaneously covers the HACCP principles. ISO 22000 references the Codex Alimentarius General Principles of Food Hygiene, CXC 1-1969[6]

ISO published the ISO 22000 family of standards made up of the following:
- ISO 22000 – Food safety management systems – Requirements for any FBO;
- ISO 22001 – Guidelines on applying ISO 9001:2000 for the food and drink industry;
- ISO/TS 22002- Prerequisite programmes on food safety
- ISO/TS 22003 – Food safety requirements for certification and auditing bodies
- ISO/TS 22004 – Food safety management systems – Guidance on applying ISO 22000:2005.
- ISO 22005 – Traceability in the feed and food chain.
- ISO 22006 – Quality management systems – Applying ISO 9002:2000 for crop production.

3.5 Voluntary Third-Party Assurance Programmes (vTPA)

Voluntary Third-Party Assurance (vTPA) programmes are comprised of food safety certification through autonomous schemes that are typically privately or commercially owned. These schemes own the copyright set of a food safety specifications that may incorporate national or international standards or requirements. Additionally, these programmes apply a governance structure for certification and conformity assessment, which includes periodic onsite audits of FBOs to ensure that they are conforming to the specifications outlined in the standard. Finally, FBO participation in these programmes is voluntary but may often be a pre-requisite for food producers and processors to be able to sell to markets or retailers. FBOs are primarily responsible for managing their products' safety and complying with government regulatory requirements for food under their control. Competent Authorities (CA) of a country may require FBOs to demonstrate that they have adequate controls and procedures to protect consumers' health and ensure fair practices in the food trade. Many FBOs use quality assurance systems, including vTPA programmes, to reduce supply chain risks and assure food safety outcomes.

The vTPA assessment and use guidelines are intended to help competent authorities consider vTPA projects to supplement regulatory compliance requirements. They provide a framework and criteria for assessing the integrity and credibility of vTPA programme governance structures and the dependability of information/data provided by such programmes to support regulatory objectives. Competent authorities should be guided by their intended use of the vTPA programme information/data when completing such an assessment.

3.6 Worldwide retailers

Suppliers and food manufacturers worldwide must also meet and comply with these requirements and typically seek third-party certification through these schemes and certification bodies to comply with their retailers' supplier requirements. The food industry attempts to collectively govern its food safety management systems to raise awareness and compliance within the manufacturing and production sectors and to reduce food safety risks to their business, with third-party auditing confirming compliance.

3.7 FSSC[7]

ISO 22000 is also imbedded in the Food Safety Systems Certification Scheme (FSSC 22000), a globally recognized vTPA which has been benchmarked against the Global Food Safety Initiative (GFSI) guidance for vTPA. FSSC, as one example of a vTPA, provides trust and delivers significant credence to the consumer goods industry. FSSC, a global non-profit and independent scheme owner, has been ensuring food safety compliance for over 12 years with its certification model that can be used in the whole food supply chain to ensure food safety standards and processes. FSSC 22000 is GFSI benchmarked and follows the food chain category description as defined in ISO/TS 22003.

3.8 GFSI[8]

The Global Food Safety Initiative (GFSI) is a private, food industry-led international organisation that works as a "coalition of action" affiliated with the Consumer Goods Forum (CGF), bringing together retailers and brand owners (manufacturers) from across the CGF membership, to create "an extended food safety community overseeing food safety standards for businesses and providing access to safe food for people

everywhere." GFSI's benchmarking and harmonisation work aims to promote mutual acceptance of GFSI-recognized certification programmes across the industry to enable a "once certified, accepted everywhere" approach. The Coalition comprises 43 committed Consumer Goods Forum members, including many prominent multi-national organizations from the US, Europe and Asia.

GFSI's benchmarking and harmonisation reduces inefficiencies, minimizes audit duplication and aids in reducing trade barriers, and is now widely accepted throughout the food industry. Private vTPA schemes, benchmarked by GFSI worldwide, address various aspects of quality management, environmental and social responsibilities, and food safety and culture.

3.9   Good Agricultural Practices (GAP)

GlobalG.A.P. is one example of a branded vTPA for on-farm quality assurance and good agricultural practices. The origins of GLOBALG.A.P. the EUREPGAP guidelines which assisted companies adhering to the widely recognised requirements for food safety, environmentally friendly production practices, worker and animal welfare, and prudent use of water, compound feed, antibiotics, and plant propagation materials throughout Europe. EUREPGAP changed its name to GLOBALG.A.P. in 2007 and is now the leading farm assurance program in the world, transforming consumer demands into Good Agricultural Practices in 135 countries.

While many national level GAP programs have been developed for domestic producers, only a few of these have been benchmarks against GFSI guidance and specifications. The benchmarked schemes include CanadaGAP, FreshCare (Australia) among others. Other schemes, such as ChinaGAP, have achieved recognition as equivalent but are not fully benchmarked with GFSI. VietGAP in Vietnam has neither.

3.10   Organic[9]

The existence of production standards and certification procedures is one of the key elements that distinguishes organic farming from other forms of sustainable agriculture. There are no universal standards for organic fruit and vegetable production and handling. Initially, private associations developed organic standards, allowing members to market their products using the respective associations' organic brands and labels. The International Federation of Organic Agriculture Movements (IFOAM), a non-governmental organisation that promotes organic agriculture globally, has established guidelines for organic production and processing that have been widely adopted. These guidelines are commonly regarded as "minimum standards," leaving room for more specific requirements based on regional or local circumstances. As organic agriculture has gained popularity, many countries have established their organic standards. Since the early 1990s, EC member countries have supported a common organic standard outlined in Regulation EEC 2092/91. Canada, the United States, and Japan have adopted organic standards and regulations. In 1999, the FAO/WHO Codex Alimentarius Commission's Committee on Food Labelling issued "Guidelines for the Production, Processing, Labelling, and Marketing of Organically Produced Foods." Organic standards are typically similar because they are based on IFOAM's organic production guidelines. Methods that contribute to maintaining or improving soil fertility

must be used. Another feature in common is that natural inputs are generally permitted while synthetic inputs are prohibited.

However, there are exceptions in both cases. Specific natural inputs determined by various certification programmes to harm human health, or the environment are prohibited. Specific synthetic inputs are also permitted. For example, EEC Regulation 2092/91 allows using specific fertilisers and plant phytosanitary products when necessary. All certification programmes keep a list of approved synthetic and prohibited natural inputs.

Many certification programmes require additional environmental protection measures in addition to the prerequisites listed above. Currently, certification for export in developing countries is frequently performed by the certification bodies of the importing countries, with a few notable exceptions (e.g., Argentina). Local certification bodies can also perform organic certification in developing countries where they exist if the importing country's authorities accredit them.

Because accreditation of certification bodies in developing countries is complex and thus uncommon, local bodies tend to form alliances with international certification agencies. Generally, the local body performs most of the activities leading to certification. In contrast, the international body evaluates the implementation of certification procedures regularly and sometimes issues certificates. This can lower costs for producers and exporters while providing access to an international certification mark. It can also help developing countries improve their local inspection and certification capacity.

3.11   Soil Association: UK Organic Standard[10]

The Soil Association sets standards for organic food to provide guidance and give recognition to farmers using nature-friendly production methods and high animal welfare practices. Soil Association Certification is a wholly owned subsidiary of the charity which certifies organic products to Soil Association standards and is one of only six UK-approved control bodies. The Soil Association's organic symbol represents a set of standards developed to embody organic principles of ecology, fairness, care, and health. 70% of organic food in the UK is certified by Soil Association Certification[11].

3.12   USDA Organic[12]

The National Organic Program (NOP) of the USDA oversees developing the rules and regulations that govern the production, handling, labelling, and enforcement of all organic products sold by the USDA. The National Organic Standards Board is a Federal Advisory Committee with fifteen members representing the public serving on it. Their input is being solicited as part of this rule-making process. The NOP also keeps a handbook communicating organic standards, including guidance, instructions, policy memos, and other documents. (For further information, consult the NOP handbook published by the USDA and the AMS).

3.13   Rain Forest Alliance[13]

The Rainforest Alliance is an international non-profit organisation that works at the intersection of business, agriculture, and forests to make businesses liable and responsible for quality, safety, and sustainability as the new normal. This work is done at the intersection of business, agriculture, and forests.

They are building an alliance to protect forests, improve the livelihoods of farmers and forest communities, promote the communities' human rights, and assist the communities in mitigating and adapting to the effects of climate change. This plan is not primarily a food safety initiative.

3.14   BAP-Aquaculture[14]

The Best Aquaculture Program (BAP) under the Global Seafood Alliance is the most prominent seafood-specific certification program that can certify every step in the production chain. The process starts with hatcheries and ends in a processing plant where product is prepared for delivery. The BAP programme is based on independent audits that evaluate compliance with the BAP standards developed by the GAA. The GAA Seafood Processing Standard has also been benchmarked by the CGF's Global Food Safety Initiative (GFSI)[15]. Being recognised by the gatekeepers of international certification standards is very important to the integrity of the BAP program.

3.15   Ethical Trading Initiative: SEDEX/SMETA (Supplier Ethical Data Exchange / Sedex Members Ethical Trade Audit)[16]

The Ethical Trade Initiative was set up to allow members to be certified in good practices regarding Ethical Trading; incorporated in this is a specific standard. Corporate members of ETI agree to adopt the ETI Base Code of Labour Practice, which is based on the standards of the International Labour Organisation (ILO). SEDEX determined the most effective steps companies can take to implement the Base Code in their supply chains. These ETI projects and working groups generate and test new ideas, frequently piloting these approaches in sourcing countries. Members establish good practices in ethical trade by participating in these groups and roundtable discussions. Training materials are then created, and resources are allocated to capture this knowledge, providing practical tools to assist businesses in implementing their ethical trade policies.

3.16   BRCGS[17]

This company was founded in 1996 by retailers seeking to standardise food safety standards throughout the supply chain. Today, its BRC scheme is recognised globally across food and non-food categories and operates one of the most stringent third-party certification schemes.

BRCGS is a market-leading global brand that contributes to supply chain trust. Their Global Standards for Food Safety, Packaging Materials, Storage and Distribution, Consumer Products, Agents and Brokers, Retail, Gluten Free, Plant-Based, and Ethical Trading set the standard for good manufacturing practise and help customers feel confident that their products are safe, legal, and of high quality.

4   FOOD SAFETY CERTIFICATION SCHEMES IN VIETNAM

Food safety certification in Vietnam encompasses both government regulated standards and private standards, both domestic and international.

4.1 Basic GAP (Internal Organisation Base Standard-TCCS)

The TCCS or Basic Standards in Vietnam are standards published by economic organisations, socio-professional organisations, state agencies, non-business units and other agencies and organisations for application in their activities. Circular 21/2007/TT-BKHCN defines the TCCS[18].

4.2 VietGAP

VietGAP is Vietnam's national standard for Good Agricultural Practice and is classified into three commodity categories:

1.   VietGAP: for crops/cultivation: fresh vegetables, fresh fruit, tea, rice, coffee, etc.
2.   VietHGAP: for dairy/beef cattle, goats, pigs, chickens, ducks, bees, and other livestock.
3.   VietGAqP: for Pangasius, tilapia, tiger shrimp, white-legged shrimp, other fish and aquaculture.

MARD (Ministry of Agriculture and Rural Development) launched the VietGAP project and related technical standards in 2008 for fruits and vegetables, with the Crop Production Department (CPD) tasked with managing and advancing its development. The standard's management and control were altered in 2017 when the Ministry of Science and Technology (MOST) announced a TCVN standard in crop production, TCVN 11892-1:2017. [19]MOST and MARD have authorised various public, commercial companies and certification bodies to consult with, audit, and certify food business operators (FBOs) and facilities under this national standard.
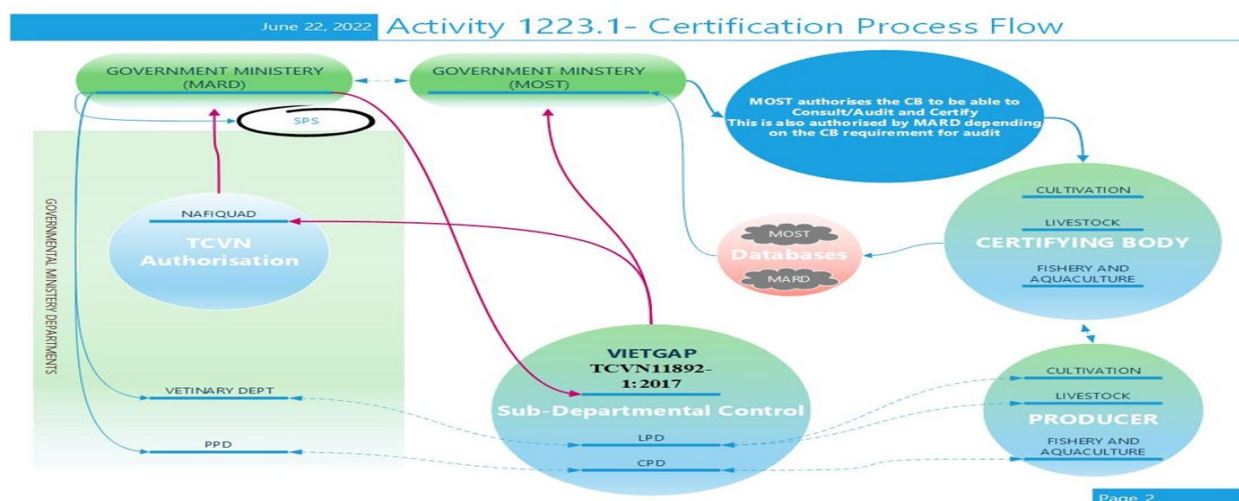

Figure 3 Initial Theoretical Certification Process Flow

The VietGAP programme has been applied to a range of crops across the country since 2008, which includes vegetables, fruit, tea, coffee, and rice. There were no official statistics about the number of farmers who had

adopted VietGAP available at the time of writing, but the adoption rate has generally been accepted as being very low and not universally applied. Reports from MARD (2014), for example, indicate there were some 7,557 ha of vegetables, 11,027 ha of fruit; 7,554 ha of rice; 5,644 ha of tea; and 124 ha of coffee grown that complied with VietGAP requirements (Cultivation Department, 2015). These crop areas represent some 0.08%, 1.35%, 0.01%, 4.19% and 0.02% of the total area in each crop production, respectively (Cultivation Department, 2015), indicating that a small number of farmers have adopted VietGAP since its introduction in 2008. Farmers' uptake of VietGAP requires changes to the socio-technical paradigm of the traditional agri-food system and many farmers did not adopt VietGAP because of 1) a lack of market demand for VietGAP-certified vegetables, 2) the risks associated with breaking informal institutions between farmers and preferred collectors; and 3) a lack of capability in key value chain actors (Hung Gia Hoang, 2018).

Annex F provides a comprehensive treatment of the socio-economic constraints for smallholder farmers to implement certification schemes, an issue which needs to be seriously addressed.

4.3 HACCP

Hazard Analysis and Critical Control Points (HACCP) and ISO are well-known standards in Vietnam, with specific technical and management requirements based primarily on accepted international best practices. All establishments must confirm a "self-declaration" of product conformity and are subject to State regulations and inspection, according to Decree No. 15/2018/ND-CP [20](SAFEGRO Policy Report, 2023b paragraph 202). Self-declaration, however, does not follow international best practice and would not be accepted as replacement for auditable certifications. In many countries inspection frequency of FBOs may be reduced if they have a third-party audited HACCP certification based on official risk assessments.

One exception is seafood processors which must comply with an obligatory QCVN 02-02:2009/BNNPTNT and have a certificate for Hygienic production conditions from NAFIQAD, a Public Service Delivery Unit (PSDU) and Conformity Assessment Organization), Cir. No. 48/2012/TT-BNNPTNT[21].

4.4 ISO 22000

The implementation of ISO 22000 is entirely voluntary, but is usually necessary for businesses to do so if they export their products or if the requirements of their customers demand them. ISO 22000 will cover the FSMS and HACCP requirements that state agencies impose.

4.5 Export

In some cases, importing countries or importing agents or companies will require FBOs compliance with vTPA private schemes for exports and reflects the further progression of the certification process towards International Standards and vTPA specifications.

4.6 BRC, IFS, GlobalGAP, ETI and/or other GFSI Schemes

Participation in any of these programmes in Vietnam is entirely voluntary; however, compliance is typically required for exports to the European Union, the United Kingdom, and the Republic of Ireland. Although these programs are voluntary in Vietnam they may be mandatory for export to the European Union, the UK, and Ireland.

5   CERTIFICATION STANDARDS, SCHEMES, AND GOVERNANCE IN VIETNAM

5.1   National Standardization

Several ministries have plans to create TCVNs, or voluntary standards, related to food safety certification and incorporate into a national TCVN plan, some of which overlap. Meanwhile, recent Politburo, National Assembly, and government resolutions and decisions dictate that such standards must also align with environmental protection, sustainable development, and industry 4.0.

At the same time international organisations such as the International Organization for Standardization (ISO), the International Electrotechnical Commission (IEC), the International Telecommunication Union (ITU), the European Standards Commission CEN/CENELIC, or countries such as the United States of America, China, Japan, Germany, or South Korea are defining the fundamental principles and orientations of internationally equivalent food safety standards.

Compliance with nation al and international developments related to food safety certification will require that new national standards:

- Are based on the principles of unity, simplicity, harmony, optimization, voluntariness, and sharing, to promote a national quality infrastructure (NQI).
- Enhance legal institutions and standards-based policies aligned with domestic requirements and facilitate new trade agreements in which Vietnam participates.
- Recognize that government and FBOs/market collaboration will be the primary drivers of the standardisation strategy's implementation supporting transition from quantity to quality, enhancing the nation's competitiveness, and fostering socioeconomic growth.
- Promote international and regional integration, and contribute to improving the quality of human resources involved in standardisation work, enhance the capacity of domestic organisations to apply standards, promote digital transformation, and bolstering Vietnam's standing in global and regional standardisation forums.

The Ministry of Science and Technology (MOST) is tasked with oversight of the accreditation process for food safety certification including auditors and certification bodies, standards for enterprises' products to meet domestic and international market requirements, promoting standards for national products and food niche, and encouraging innovation.

The National Standardization Strategy is expected to accelerate the formation of a national standard system by promoting a comprehensive operational management model for standards, optimising the governance structure, enhancing the efficiency of standards development, and increasing the level of internationalisation of standards. In addition, the standardisation plan should meet the government's requirements outlined in the National Economic Development Strategy to 2030 and the Industry and Field Development Strategy to achieve economic development objectives.

According to the Vietnam Association of Standards and Quality Science and Technology, the creation of TCVNs is based on global and regional standards, since the Law on Standards and Technical Regulations was passed in 2006, together with the Agreement on Technical Barriers to Trade (also known as the WTO/TBT agreement), aligned with Vietnam's accession to the World Trade Organization.

5.2   Food safety standards

MOST assigns designations for each of the individual standards and regulations among various national standards. The consolidated Document No. 31/VBHN-VPQH(2018) Law on Standards and Technical Regulations[22] help distinguish the differences between (See Table below):

- TCCS   Base National Standard
- TCVN   Voluntary Standards of Viet Nam
- QCDP   Local Technical Regulation
- QCVN   National Mandatory Technical Regulation

The SAFEGRO Policy Review indicates that the QCDP are implemented at the local/provincial level and can over-rule National requirements regarding regulations specific to a particular industry, locality, or zone. (Alinea International, 2023a, 2023b)

5.2.1   Definition of TCCS/TCVN/QCVN and local QCDP

Comparison Table	TCCS / TCVN	QCVN
Purpose of use	Regulations on technical characteristics and use as standards for classification and evaluation of quality.	Regulations on the limit level of technical characteristics and requirements for subjects to comply.
Symbol System	TCCS (Internal Organisation Base Standard) TCVN (National Standard)	QCVN (National Technical Regulation) QCDP (Local Technical Regulations)
Classify	Basic Standards Terminology Standards Standards for technical requirements Standard test Method Standards for labelling, packaging, and transportation	General technical regulations Safety Technical regulations Environmental Technical Regulations Process Technical Regulations Service technical regulations
Principles of Application	**Voluntary**	**Compulsory**
In trade	Products that do not conform to the standard are still allowed to do business normally.	Products that do not meet the requirements of the respective Technical Regulation will NOT be eligible for business.
Publishing agency	State Agencies Non-business units Social and professional organisations Economic organisations.	State Agencies

Figure 4: Definition of TCCS / TCVN / QCVN and Provincial QCPD

5.3   Food Safety in Vietnam

The Ministry of Health (MOH), through the Vietnam Food Administration (VFA) and its subordinate agencies, notably the National Institute of Food Control (NIFC), Department of Food Safety, and Food Safety Management Board, regulate and control food safety in Vietnam, and are responsible for drafting food safety legislation and guidelines, establishing food quality and safety standards, and regulating food safety activities nationwide.

NIFC is a specialised agency under the MOH tasked with conducting research, testing, and inspection of food items to ensure conformity with national standards and regulations. The Vietnam Food Administration is responsible for coordinating and implementing food safety policies and programmes locally, while the Food Safety Management Board oversees food safety control measures in Vietnam.

The Ministry of Agriculture and Rural Development, the Ministry of Industry and Trade, and provincial and local health authorities are also mandated for food safety control in Vietnam. In addition, private sector companies such as food producers, manufacturers, importers, and retailers must adhere to food safety rules and guarantee the quality and safety of their products.

Decree No. 15/2018/ND-CP, which offers specific guidelines and implementation measures for the Law on Food Safety, is Vietnam's principal decree governing food safety. The Vietnamese government issued this decree on February 28, 2018, and it went into force on that date. Decree No. 15/2018/ND-CP addresses food safety-related topics, including food production, processing, import, export, transit, storage, and distribution. It establishes rules and standards for food safety control measures, including hygiene and sanitation conditions, labelling and packaging, testing and inspection methods, risk assessment and management. The decrees stipulate the roles and responsibilities of government entities involved in food safety control, including the Ministry of Health, the Ministry of Agriculture and Rural Development, and municipal health authorities. It details the penalties for non-compliance and infractions of food safety standards, including fines, suspension, or cancellation of licences, and, in egregious cases, criminal prosecution.
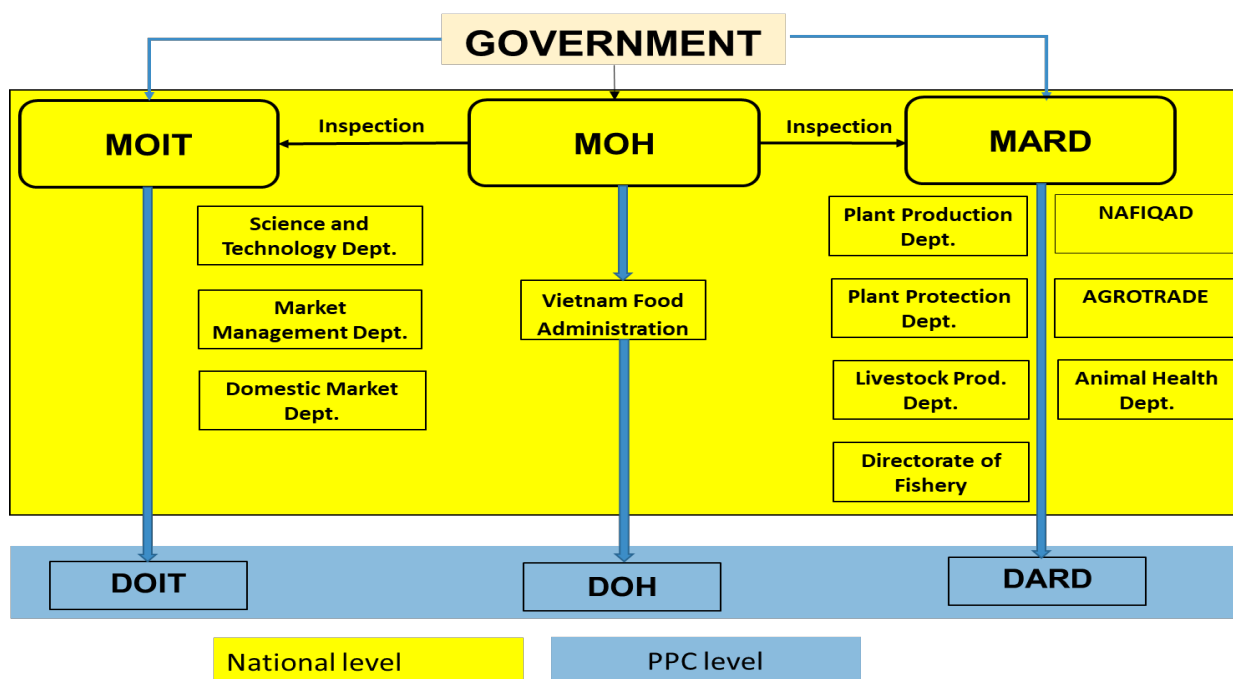
Figure 5: Food Safety institutional governance

The Law on Food Safety (2010), in an effort to streamline state food safety management, assigns responsibility and specific commodities to three central ministries, namely the Ministry of Health, the Ministry of Agriculture and Rural Development and the Ministry of Industry and Trade, to coordinate the management of food safety :

- MOH, through the VFA, is responsible to the oversight of state food safety management, and presides over the designated competent state agencies for promulgation and organizing the implementation of national strategies and regulations. This includes master plan on food safety; regulations on general conditions to ensure food safety for food production and business establishments, including eateries, restaurants, canteens, catering services, and street vendors. The Ministry of Health also manages food safety for functional foods and micronutrients.
- MARD manages food safety throughout the production, collection, slaughter, preliminary processing, preservation, transportation, export, import, and trading cereals, meat, and other primary products.
- MOIT manages food safety throughout the process of production, processing, preservation, transportation, export, import and trading of processed foods, wine, beer and drinking water, dairy products, vegetable oil, flour and starch processing products, food additives, and processing aids. The Ministry also manages food safety at wholesale markets for the above products and food safety at retail markets, supermarkets, and retail stores for the above products. The distribution of responsibilities is illustrated in Figure 14.

Figure 6: Matrix table for food sector responsibilities within MARD, MOH and MOIT

5.4 Competent Authorities for Food Safety Standards, VietGAP/HACCP and ISO 22000.

MARD is in charge of all aspects of agriculture, performing state management functions in agriculture, forestry, salt production, fishery, irrigation/water services and rural development. They authorise their respective departments under their guidance to implement the policy and laws related to food safety certification in Vietnam. Among its many responsibilities those which could relate to food safety include:

- Agricultural policies and strategies: crop and livestock production, forestry, fisheries, and irrigation.
- Sustainable natural resources, environmental protection, and climate change impacts.
- Food security and safety, improving food quality, and promoting the export of agricultural products.
- Rural infrastructure, including water supply, and sanitation facilities.
- Implementing programs and projects to reduce poverty and improve livelihoods in rural areas.
- Regulating and monitoring activities related to plant and animal health, quarantine, and food safety.
- Supporting research and innovation in agriculture and rural development.

5.4.1 Crop Production Department (CPD)

CPD is a department under MARD that oversees crop production developmental activities including food safety within the broader scope of its main activities:

- Developing policies, strategies, and plans for crop production and plant protection.
- Research and innovation: crop production technologies, new varieties and cultivation methods.
- Technical guidance and support to farmers, cooperatives, and other stakeholders
- Programs to improve productivity, quality, profitability and sustainable agriculture practices.

- Regulations and standards for crop production, plant protection, pesticide use, and food safety.
- Collaborating with domestic and international organizations on crop production and plant protection.

5.4.2   Livestock Production Department (LPD)

The LPD, a department under MARD, oversees livestock development including food safety within the broader scope of its main activities:

- Policies, strategies, and plans for livestock production and animal health (with DAH)
- Research and innovation in livestock production
- Technical guidance and support to farmers, cooperatives, and other stakeholders
- Programs to improve productivity, quality, profitability and sustainable agriculture practices.
- Regulations and standards related to livestock and food safety.
- Collaborating with domestic and international organizations in livestock and animal health.

5.4.3   National Agro-Forestry-Fisheries Quality Product Management (NAFIQPM)

The National Agro-Forestry-Fisheries Quality Product Management (NAFIQPM) controls aquaculture certification and implementation of the related TCCS, TCVN and QCVN more broadly across MARD, among other responsibilities in this area. They are the certification focal point in all ministerial consultations related to promulgation of certification standards in the agri-food sector.

It should be noted that QCVN certification requirements have been harmonised within the Livestock and Aquaculture departments but are not developed for crop cultivation.

Provincial governments add another level of complexity to the flow, with DARD (Provincial Department of Agriculture and Rural Development) and District Level. The programs and initiatives MARD issue, subject to local interpretation, may bypass the CPD or LPD. Coordination of any endeavour is, therefore, much more complex. Dr. Hung's Paper, 'Farmers' Responses to VietGAP: A Case Study of a Policy Mechanism for Transforming the Traditional Agri-food System in Vietnam' (2.4, P19), shows this complexity well[23].

5.5   Conformity Assessment Implementation of National Standards and Certifiable Schemes

Apart from the line ministries, there are 3 central departments associated with accreditation and implementing the national standards and certifiable schemes.

5.5.1   Ministry of Science and Technology (MOST)

The Competent Authority for issuing standards for certification within the Vietnamese government is MOST and its related Departments and sub-departments.

5.5.2   Bureau of Accreditation (MOST)

Conformity Assessment Organizations (CAOs) can voluntarily engage the Bureau of Accreditation (BoA) to accredit their internal systems for certification. This will allow the CAO to be accredited with VILAS, VIAS, or VICAS, depending on the field of operations, granting them international recognition. The BoA within MOST is vital in ensuring the reliability and credibility of conformity assessment results in Vietnam, enhancing the quality and safety of products and services, facilitating trade and market access, and protecting consumers.

5.5.3   Directorate of Standards, Metrology and Quality (STAMEQ)

STAMEQ develops and implements national measuring, calibration, and testing standards. Providing businesses and organisations with technical assistance and training about metrology and quality; accrediting conformity assessment organisations, including laboratories, inspection bodies, and certification bodies; promoting international collaboration and mutual recognition in metrology and quality with other nations and intergovernmental organisations; and accrediting laboratories, inspection bodies, and certification bodies. STAMEQ is also charged with enhancing the competitiveness of Vietnamese goods and services by creating and applying international standards and best practices in metrology and quality.

5.6   Process Flow for the issuance of VietGAP/HACCP and ISO 22000 Certification

This section will look at the process flow for the various departments and certification schemes present in Vietnam in the context of this report.

5.6.1   Crop Production Department
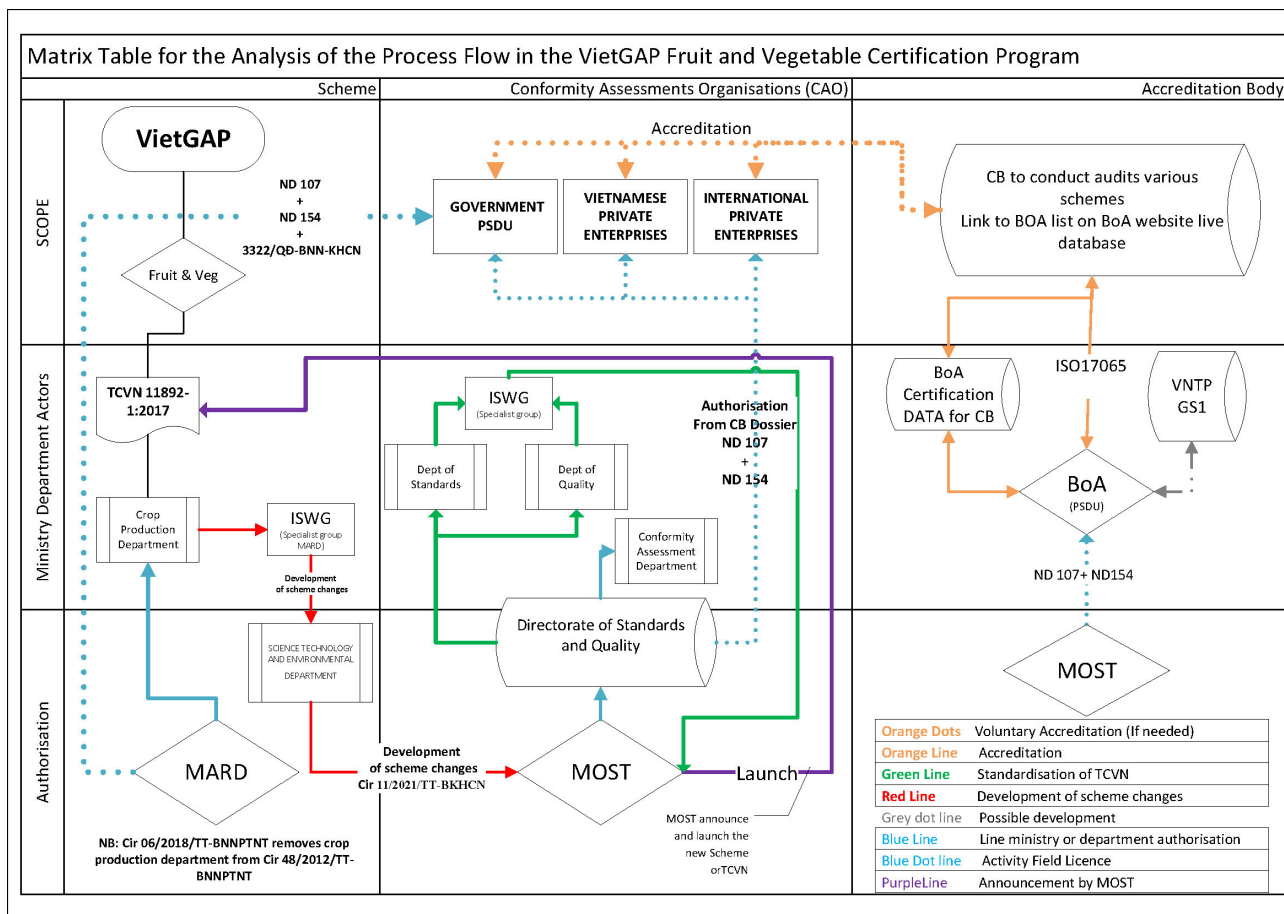
Figure 7:Matrix Table for the Analysis of the Process Flow in the VietGAP Fruit and Vegetable Certification Program

For the development, approval, and announcement of TCVN 11892-1:2017 for Fruit and Vegetable VietGAP production, MARD must go through several stages to apply the TCVN recommendations. MOST/STAMEQ, and numerous sub-line ministry agencies participate in this process to meet standardisation requirements[24]. Even though MARD is the scheme's producer and owner, they must follow the standards' requirements. As a result, it is the role of MOST and STAMEQ to oversee the procedure.

5.6.1.1 The required steps for TCVN issuance.

1. Proposed Crop Production changes must be submitted to an internal intersectoral working group in MARD and then to the Science Technology and Environmental Department to ensure that proposed changes adhere to TCVN guidelines, and are reviewed by a panel of experts.
2. Proposed changes will be forwarded to MOST/STAMEQ, where an Inter-Sectoral working group will standardise the TCVN and ensure compliance with legal requirements.
3. Once proposed changes meet technical and legal requirements, the MOST will launch the new TCVN or additions to the TCVN.
4. The TCVN goes into effect.

5.6.2   Department of Livestock Production
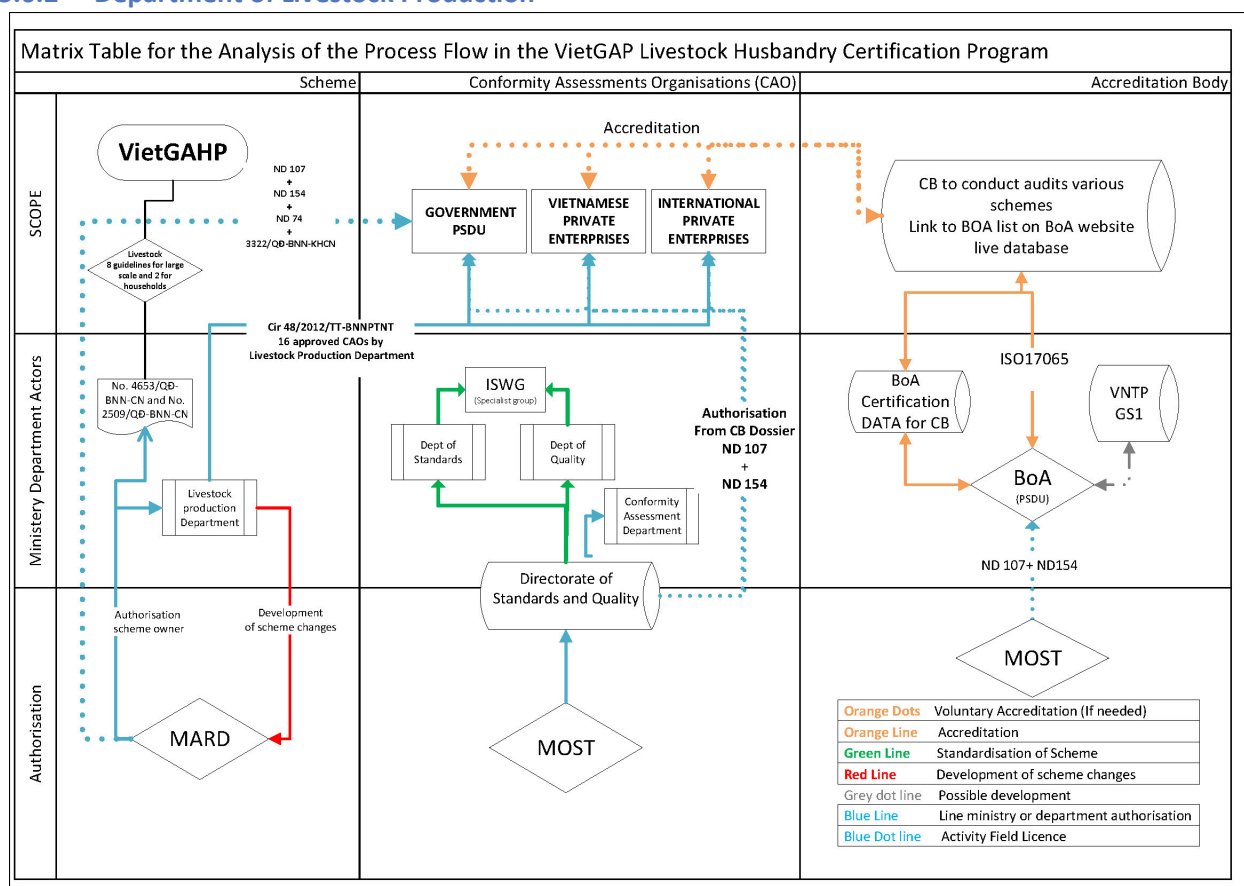
Figure 8: Matrix Table for the Analysis of the Process Flow in the VietGAP Livestock Husbandry Certification Program

Figure 21 shows the relative process flow for the production, announcement, and authorisation of Decision No. 4653/QĐ-BNN-CN and No. 2509/QĐ-BNN-CN for livestock production. Under this decision, there are eight guidelines for commercial production and two for household production.

5.6.2.1 The standard process for base national livestock production standards from MARD.

The process is simplified when the guidelines are not required to be a TCVN or QCVN and the Line Ministry and its sub-department can keep the scheme's operational revisions internally, thus allowing for a more streamlined. Changes can be made internally without the need for it going through the standardisation process with STAMEQ. They also have control over approving Conformity Assessment Organizations (CAOs), via Circular 48/2012/TT-BNNPTNT MOST directly issuing approval to the CAO.

5.6.3   Directorate of Fisheries
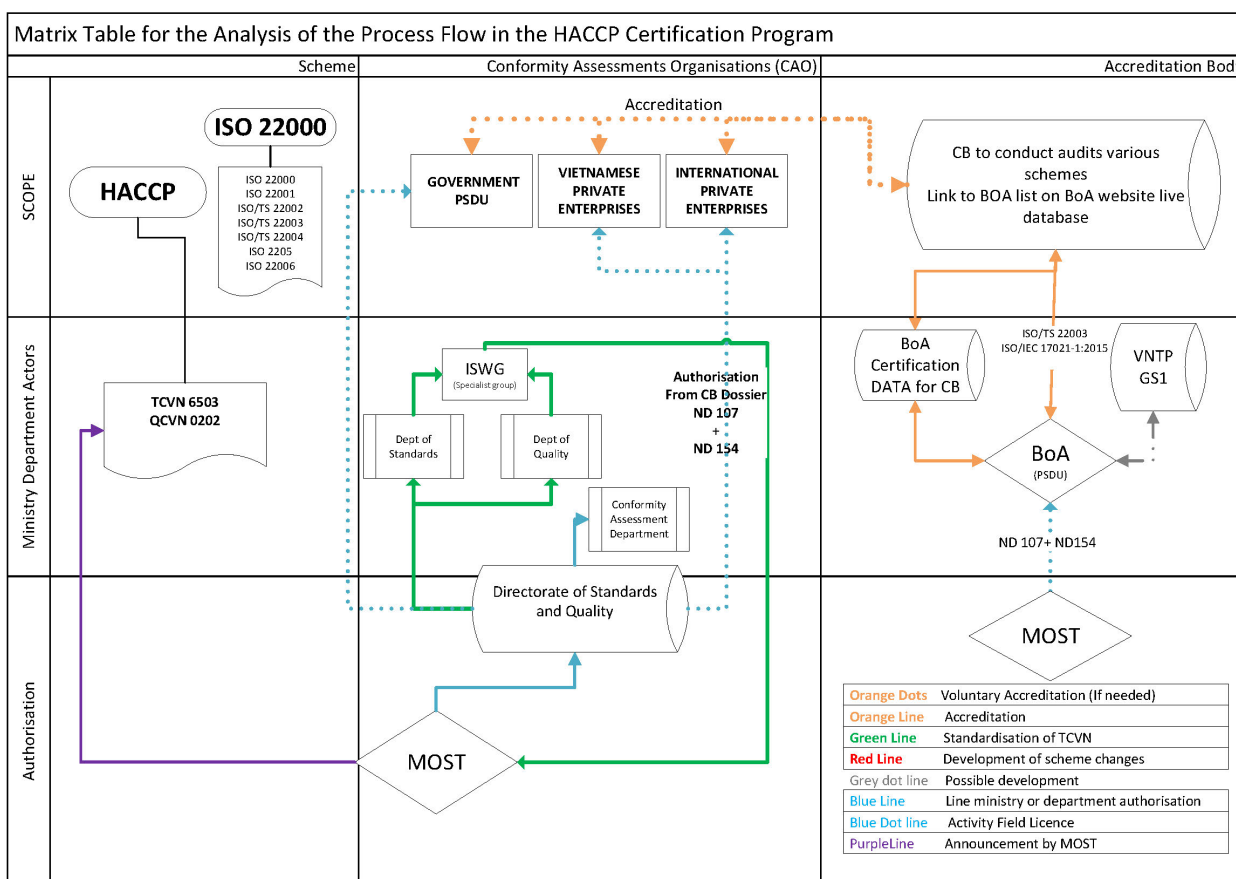
Figure 9:Matrix Table for the Analysis of the Process Flow in the VietGAP Fisheries Certification Program

Figure 22 shows the relative process flow for the production and announcement and authorisation of Decision No. 3824/QĐ-BNN-TCTS, No.4669/QĐ-BNN-TCTS, No.4835/QĐ-BNN-TCTS and No.1233/QĐ-BNN-TCTS for Aquaculture production. Under this decision, there is guideline for GAP production and three for specific speciality production.

5.6.3.1 Status of Aquaculture pending adoption of TCVN 13528:2022

The current aquaculture certification process is under Decisions No. 3824/QĐ-BNN-TCTS, No.4669/QĐ-BNN-TCTS, No.4835/QĐ-BNN-TCTS and No.1233/QĐ-BNN-TCTS. A new TCVN harmonised Aquaculture in December of 2022, TCVN 13528-1:2022, creating a second process flow which supersedes the MARD practice guidelines and which will come into force once a pending Circular is produced to remove Aquaculture from the line ministry.

5.6.4   HACCP[25]
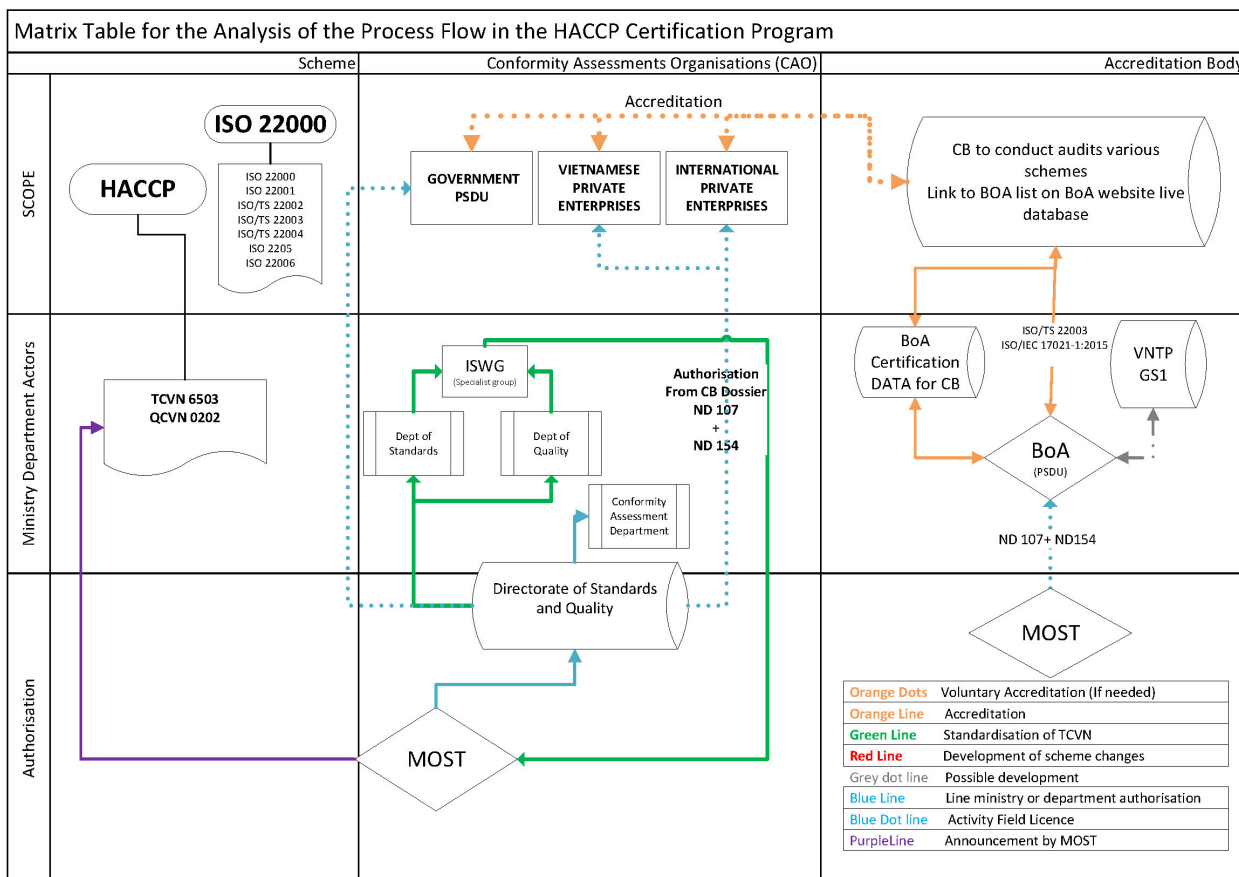
Figure 10: Matrix Table for the Analysis of the Process Flow in the HACCP Certification Program

HACCP and ISO22000 are food safety management certification schemes for FBOs involved in food processing, packaging, handling, and retail distributors and the three ministries (MARD/MOIT/MOH) grant registration of these certifications to CBs in their respective areas of responsibility. In accordance with Decree 15/2018/ND-CP, the line ministries can issue specialised food processing industry codes and approvals to CBs for the purpose of state management of the industry.

5.7 Management of CBs

The figure below provides details on the process flow for the Accreditation of the CBs and their authorisations from the various line ministry departments to implement certification audits.
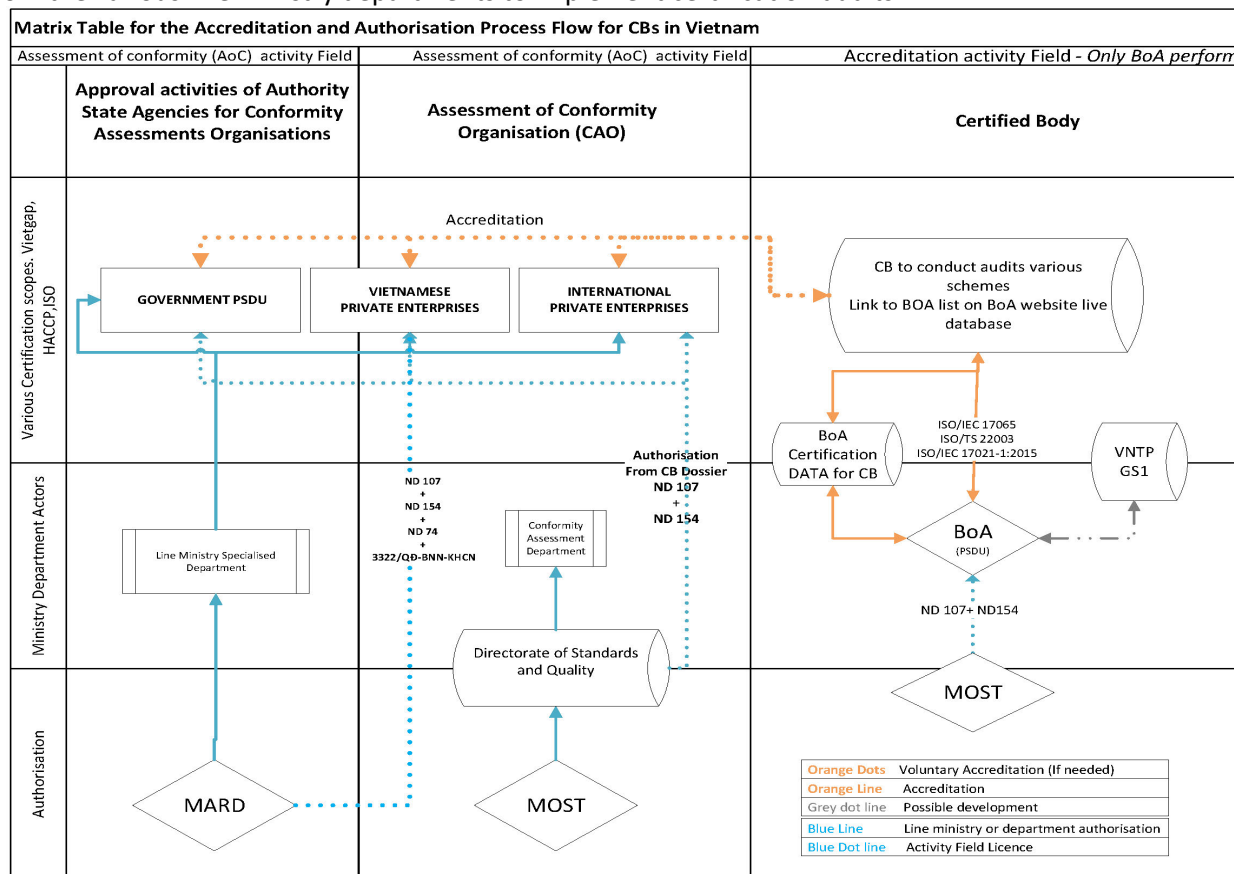
Figure 11: Matrix table for the Accreditation and Authorisation of CBS

5.7.1 Bureau of Accreditation *(see organigram on page 46)*

The role of the Bureau of Accreditation (BoA) is a voluntary step that any CAO can undertake to accredit its internal systems. This will allow the CAO to have VILAS, VIAS or VILLAS accreditation, depending on the field of operations. The BOA will assess the CAO via one of three schemes, again depending on its field of operations for any of the following: ISO/IEC 17065; ISO/IEC 22003; ISO/IEC 17021-1:2015

The approval process, available on the BOA website, provides for the CAO to apply for accreditation on-line or via mail in hard copy[26].

5.8 Certification Body Internal Management

Certification Bodies (CBs) are the organizations and companies which have been officially accredited to undertake formal food audits of farmers, FBOs and other value chain actors to issue vTPA certificates of food safety compliance with specified checklists or to identify non-conformities which prevent certification. Understanding how certification bodies (CBs) disseminate information and control the certification process is critical. For GAP, they use internal systems based on ISO 17065; other management schemes use ISO 22000.

5.8.1 VietGAP criteria and requirements for CB schemes

VietGAP has four separate required criteria categories for evaluating the producer compliance with VietGAP certification.

1: Production

Farming methods: harvesting, seedling standards (fisheries, livestock), water and land resources.

2: Working environment

Occupational health and safety standards to prevent labour abuse and protect workers' health.

3: Food safety

Food safety standards to prevent contamination, controls for allowable ingredients and preservatives; monitoring chemical/antibiotic residues (plants, livestock, and fisheries) and legal compliance

4: About product origin

Traceability is required for VietGAP certified products

5.8.2 Procedures for VietGAP certification and audits

The business seeking VietGAP certification is required to submit a dossier for approval which should include the following:

- • Registration document for VietGAP certification.
- • Production area map, design explanation, production area layout, post-harvest processing, preliminary processing, and storage
- • CB internal audit VietGAP certification process results

The procedure for undertaking a VietGAP audit include the following steps:

1. Receive customer information on the registration for the VietGAP certification consulting service.
2. Consult with applicant on specific VietGAP certification services, then quote and sign contracts.
3. Create detailed and specific plans for each product's roadmap and conduct audit
4. Assess the FBOs product manufacturing and preparation processes.
5. Evaluate the suitability of the business production process and preliminary products.
6. If non-conformities are not found, the CB issues the VietGAP certificate, which is valid for 3 years
7. The VietGAP certification provider may provide improvement services and periodic product quality monitoring. The VietGAP certification provider will notify customers before the annual supervision audit, generally within two months.

Note: International best practice recognizes that CBs conduct vTPA food safety certification audits but must not provide consulting, advisory services or training related to food safety certification or technical assistance to support FBOs compliance with such audits, as this is considered a serious conflict of interest.

Annex C contains more detailed information including a summary of all activities, relevant legal documentation, and a summary of legal controls for amending non-conformities.

5.8.2.1 Summary Table for GAP-HACCP-ISO Definition of Terms and Legal Documents

A summary table has been provided in Annex D, to clarify the GAP analysis process and related definitions. Annex D contains a comprehensive list of all legal and regulatory documents related to the project activity.

6   SWOT ANALYSIS

6.1   The reason for SWOT analysis

A simplified SWOT analysis was undertaken to identify strengths, weaknesses, opportunities, and threats related to improvements in the food safety certification process for Vietnam as outlined below:

Strengths

- o Good Policy in place
- o Ability to make change rapidly.
- o Strong mechanism for food safety programs due to government inclusion with daily life.
- o Strong priorities in reducing food pricing volatility.

Weaknesses

- o Organizational Structure certification scheme is complicated and time-consuming
- o Enforcement of regulatory framework difficult with self-declaration
- o Inadequate traceability
- o Large quantity of paperwork administration and cost of certification for FBOs
- o Not technically harmonised to International Standards (GFSI) and ASEANGAP
- o VietGAP/HACCP scheme governance not consistent with international best practice
- o Multiple (48) food safety certification brand logos for VietGAP and others
- o Low adoption rates for VietGAP – (See Annex E)

Opportunities

- o Reduce the complexity of the scheme process flow and sustainable price point
- o Improve administration, traceability transparency and trust with digital transformation
- o Align VietGAP with international best practice and buyer requirements
- o Unified National and Provincial Roadmap among multiple certification scheme
- o Raise consumer awareness for demand of FS certification – trust and transparency

Threats

- o Negative impact from social media and mass media
- o Lack of cohesion between National and Provincial levels
- o Lack of unified roadmap and compliance of CBs and poor adoption by FBOs and farmers
- o Socio-economic impact high

7 BRANDING AND CONSUMER CONFIDENCE IN CERTIFICATION PROCESSES[27].

Branding and transparency are critical for ensuring trust and reliability of a food safety certification scheme and should include:

- Transparency about the product and processes to help build consumer trust with a standardized universal logo
- Visibility of the scheme's commitment
- Differentiation of the schemes of certified products in the marketplace

Individual conformity assessment organisations can currently present a logo to STAMEQ for approval. Anyone certified by them is then authorised to use that logo. However, this is not well managed, with approximately 48 different VietGAP logos in use in Vietnam. As a result, there is a need for reassessment of the food safety certification governance, standardisation and a consultative procedure to determine a unified logo for the schemes with traceability. The end goal is to reinstate integrity and customer confidence for the VietGAP scheme.

7.1 Examples of Unique Logos.

Table 2: Examples of Unique Logos

Scheme	Description	Unique Logo
GlobalGAP	The GGN label logo is a transparent system that builds trust of the GLOBALG.A.P. certification linked to producers, printed onto the packaging of products. Consumers can search the GGN label portal to find a profile for the corresponding farm or business – featuring farm profiles, FAQs, and news articles.	
BRC	The British Retail Consortium Global Standards label is issued under license from BRCS to FBOs in compliance with accredited CB audits providing transparency that the FBOs fulfilled the scheme's requirements.	
Best Aquaculture Practices	The BAP label signifies compliance International Aquaculture Alliance Audit BAP requirements for: Environmentally Responsible, Monitor the behaviour and physical health and ensure the animals are treated humanely, Food safety and social accountability[28].	

The GGN label is GLOBALG.A.P.'s consumer label, for example, represents certified, responsible farming and transparency. Found on both packed and loose products, the GGN label offers consumers consistent, relevant assurance and orientation throughout the store. It confirms that the products were farmed in line with certified, responsible farming practices that cover food safety, environmental protection, animal welfare, social responsibility, and supply chain transparency. It may be applied to a variety of commodities: fresh fruit, vegetables, herbs, farmed finfish, crustaceans, molluscs, and seaweed/algae, flowers, potted plants, and trees.

8 FINDINGS AND GENERAL RECOMMENDATIONS

8.1 Report findings and recommendations

Table 3: Report Findings and Recommendations

ITEM #	FINDING	RECOMMENDATION
1	VietGAP certification standards in animal husbandry and aquaculture have not been fully adopted to a TCVN, QCVN, and therefore follow regulations on conformity certification standards in Clause 2, Article 44 and Clause 2, Article 47 of the Law on Standards and Regulations technical standards.	The Ministry of Agriculture and Rural Development and the Ministry of Science and Technology should develop Good Livestock Practice Procedures and Good Aquaculture Practice Procedures into TCVNs to conform to the provisions of the Law on Standards and Technical Regulations.
2	VietGAP has not been benchmarked against any international standard or within GFSI guidelines.	Suggest the translation of the various VietGAP schemes and upload them to ITC so the scheme can be benchmarked against the other standards currently being mapped by ITC. Set an agreement with GFSI and the VN government to get the standard benchmarked against GFSI.
3	As section seven mentions, VietGAP does not have specific branding or a unique logo identifier/ certification mark. Certification organizations themselves design the logos. There are more than forty different VietGAP certification marks due to the substantial number of VietGAP certification organizations that have been granted registration and designated areas of operation. Therefore, the VietGAP certification mark/logo is not recognized consistently, making it difficult for consumers to choose VietGAP-certified products.	Propose that the Ministry of Agriculture and Rural Development prescribe a unique VietGAP certification logo template throughout the country, making it easy for consumers to recognize and use VietGAP-certified products.
4	For certification organizations with product certification activities (GAP) and food safety management systems (HACCP) according to TCVN 5603:2008[29] (HACCP, Codex 2020, ISO 22000, FSSC) Establishments in the supply chain of agro-forestry-fishery food,	Proposal to amend the authorisation scope at the line ministry for 107/2016/ND-CP, thus assigning the Ministry of Agriculture and Rural Development to be the registration agency that organizes certification of food safety management systems

	according to current regulations, the field of operation must be registered at the Ministry of Agriculture and Rural Development and the Ministry of Science and Technology. In particular, the Ministry of Agriculture and Rural Development is assigned to manage food safety according to the Law on Food Safety and Decree 15/2018/ND-CP for the entire production process of agro-forestry-fishery products.	(ISO 22000, FSSC, HACCP). This is to unify the focal point for state management in accordance with the provisions of the Law on Food Safety, the Law on Standards and Technical Regulations, and the Law on Product Quality.
5	Organizations registered under management systems register for certification activities at the General Department of Standards, Metrology and Quality. Registration dossiers comply with Decree 07/2016/ND-CP and Decree 154/2018/ND-CP.	However, HACCP or ISO22000 certification is a food safety management system certification. To manage food safety, the responsibility belongs to the three ministries of MARD, MOIT and MOH (as assigned in the Food Safety Law, Decree 15/2018/ND-CP). The proposal would be that the three ministries grant registration to the CAOs relating to their areas of activity, falling in line with Decree 15/2018/ND-CP.
6	Accreditation Activity: - It is a voluntary activity. CAOs wishing to be assessed and accredited must register with the Bureau of Accreditation (BoA) to be evaluated and recognized as having the capacity to perform certification following the respective standards, specifically: For GAP-certified CBs: The accreditation standard is ISO/IEC 17065. For HACCP-certified CBs: The accreditation standards are ISO/TS 22003 and ISO/IEC 17021-1:2015.	The BoA plays a critical role in ensuring the reliability and credibility of conformity assessment results in Vietnam, which helps improve the quality and safety of products and services, facilitates trade and market access, and protects consumer interests. Consideration should be given as to whether this must be a compulsory requirement.
7	There is a general need for a roadmap to be implemented to promulgate VietGAP to Local. Gap / GlobalGAP.	Organise and consult with GlobalGAP to promulgate VietGAP to local. gap PFA VFP local gap. has been designed by GLOBALG.A.P. to be used as a capacity-building tool or as a local standard for agricultural supply chains, especially in developing economies and emerging markets.

		It is intended to help producers adopt good agricultural practices that can improve farm management efficiency, cut exposure to food safety risks, and comply with legislation on food safety. Producers can gain increased access to local and regional markets through these steps. ("localg.a.p. PFA - GLOBALG.A.P")
8	There is a need for a national database for all certification activities.	Consider the use of a unique identifier for all accreditation and conformity certificates. The Unique Identifier could be a GLN specified for the entity and thus uniquely traceable. Possibility of adding a 3D barcode to the certificates for security and fraud prevention. Collaboration should be discussed with GS1 to utilise the VNTP to form a national database. Database for all the Accredited Certification Bodies. Linked to the line ministry approvals. Database for all the scheme certifications. Linked to any line ministry approvals. Ability to search this nationally and confirm the validity of the certification.
9	Administrative procedures and the process flow for certification are cumbersome and time-consuming.	Set up a workshop with all stakeholders to discuss how the administration processes can be shortened. Discuss the possibility of using digital transformation to shorten the timescale. Reduce the reliance on manual administration. Coordinate with the Finance Ministry to discuss cost-effectiveness/savings by implementing the above recommendations.
10	Terminologies between stakeholders and departments are not uniform, and it is not easy to synchronise between the various regulations.	Aligning the specific vocabulary in the legal documents, regulations, and resolutions. Make the explanations simpler to understand, especially for non-governmental stakeholders.

		See Annex F for a discussion document.
11	Smallholder constraints and route to market access	Development of subsidies for small holders to be able to access certification schemes and costs to be offset by government incentives.

8.2   Challenges and suggestions from Stakeholder interviews

Table 4: Challenges and Suggestions from Stakeholder Interviews

Department or agency	Name of Stakeholder	Challenges	Suggestions
MARD	Department of Crop Production (CPD)	-Before VietGAP for vegetables becomes TCVN, DPP can control the VietGAP scheme regarding CB registration and audit. -When VietGAP became TCVN 11892 according to degree 107, some CBs registered to STAMEQ (MOST), so the DPP lost control over the CB.	See below recommendation
MARD	Department of Livestock Production	-Vietgap must be upgraded in production, evaluation process, labelling, and management. -Desire to upgrade to ASEANGAP, then to GlobalGAP to apply for large-scale, export-oriented farm production. -Thus, there are three levels of GAP (basic, ASEAN and GLOBAL): a roadmap is needed	-Develop plans and roadmaps to amend and supplement documents -Consult Experts, organizations, and individuals to upgrade to VietGAP2.0 - Organize conferences to share information and new findings related to food safety, develop food safety targets
MARD	Directorate of Fisheries	-Before TCVN, the Directorate appointed 9 CBs, the quality of CBs and auditors were controlled, and the certified farms were reported to the line ministry.	-Training for auditors, experts under line ministries -Training (ToT, ToMT) on ISO 17065, 19011 and 9001

		-When the TCVN on VietGAP were issued, the line ministry could not ensure CB and auditors' quality. -Complex when VietGAP become TCVN.	-Need the support for linkage between VietGAP producer to market. -Need equivalent assessment of the USA on the VietGAP certifying catfish product.
MOST	Department of Quality conformity (STAMEQ)	-State management of CB, CBs need to register with the department for permission to work in the VietGAP/HACCP certification field. -When VietGAP became TCVN, STAMEQ (specifically the Department of Quality Conformity) found that it was not easy to control or collect data from CBs,	Need digitalization for sharing database on certification.
MOST	Bureau of Accreditation	-The accreditation is voluntary. BoA is a PSDU that provides accreditation to any scheme that the market needs. Even when there is a small number of customers in each scheme, BoA still must provide the service	-Reduce the administration of the processes
CB	Quacert	Quacert is assigned to train auditors	NA
CB	Vinacert	Vinacert provides different services, including certification, accreditation, and having eGAP to control the vegetable chain. Is a private CB	NA
CB	Hanoi Agri Cert	-Before 2017, CBs operate following Cir 48 with an available checklist for audit. After that, CBs must develop their own checklist. -It is challenging to train auditors. -Enterprises choose CBs with a less strict audit for their certification process. -Hanoi AgriCert needs to report to DCP, DLP, STAMEQ and Hanoi DARD	- There is a need to train and foster CB's experts according to international standards and improve the system

CB	British Standardization Institute	NA	NA
CB	NAFIQAD 1		
Producer	Bac Hong Cooperative	-ISO 22000 requires too much documentation. -VietGAP vegetables need more effort, but the prices are not significantly different. -Coop is a small enterprise lacking trading and market access technology and resources.	-Need training on HACCP/ISO 22000 -Need digital platform for management.
Producer	Anh Minh fishery processing (Hai Phong)	-Regulations and standards are more challenging to follow than the quality requirements of foreign customers.	-Need to learn HACCP according to international standards.
Producer	Fish farm (Hai Phong)	- People do not need VietGAP certification if there is no support from the state and no support to access the market, so the price of certified products is no different from normal products.	-Need the support for linkage between VietGAP producer to market. -Training on VietGAP -Support to expand the certification production areas.

8.3   Specific recommendations from MARD departments

8.3.1   Department of Crop Production (DLP)

- Proposal to amend the GAP for Crop Production (submitted to the Department of Science and Technology and the Ministry of Science and Technology).
- Revise GAP version includes both Vietnamese and English (harmonize with AseanGAP: Look at the above recommendation)
- Develop a Circular guiding the certification process (request to support 2 Workshops in Hanoi and Ho Chi Minh City).
- Training of Consultants and Certified Professionals (for staff under the Department of Crop Production). International experts are invited to teach.
- Produce literature for Crop TCVN 11892-1:2017 VietGAP with the Gender-based VC for farmers and producers.

- It is proposed to coordinate two forums of producers and consumers: about the benefits of VietGAP products in food safety to communicate that consumers accept competitive prices between VietGAP products and non-certified products,
- Proposal to design a standard logo template about VietGAP for nationwide use (for both Cultivation, Livestock and Aquaculture: See above recommendations).

8.3.2   Directorate of Fisheries (DOF)

- Assist in the development of VietGAP Guidelines, Part 3.4. Breeding in Cages; Molluscs farming.
- Develop the "VietGAP TCVN manual" and organize the training courses of the TCVN for the evaluation experts and consultants.
- Recommend training for all level staff and farmers on ISO 9001, ISO 19011, and ISO 17065.
- Produce literature for Fishery TCVN 13528-1:2022 VietGAP with the Gender-based VC for farmers and producers.
- Offer to support technical workshops,
- Develop a pilot value chain in the South (Certificate and trademark).

8.3.3   Department of Livestock Production (DLP)

- Support survey, VietGAHP and certification facilities
- Develop a plan for a legal document modification.
- Support workshop to get expert opinions to upgrade from VietGAHP to TCVN or VietGAHP version 2,
- Support training on food safety of livestock products (attached to VietGAHP)
- Coordinate and organize food safety conferences to change consumption habits of certified and non-certified products.
- Develop 1-2 animal production models to ensure food safety in raising pigs and chickens.
-

9   SUMMARY OF RECOMMENDATIONS AND PROPOSED INTERVENTIONS

The provincial governments of Hanoi and HCMC, as well as key food business operators (FBOs) in selected value chains, including wet markets, are expected to be able to:

- Understand the content and requirements of National TCVN standards, Basic GAP, VietGAP, VietGAP Plus, HACCP and ISO22000 in Vietnam.
- Identify suitable and relevant requirements at a farm level within VietGAP and HACCP for processing and cooperatives and ISO 22000 in a food processing environment.
- Plan, pilot and evaluate the recommended VietGAP, HACCP, and ISO 22000 compliance in the selected VCs
- Clarify the function of food safety compliance programmes, schemes, and management systems to facilitate compliance with a more risk-based food safety system, with international benchmarking recognition (GlobalGAP, GFSI, PGS, BRC, IFS) where possible and reference to specific retailer supplier requirements where applicable.

The tools required to support the implementation and monitoring of the VietGAP, HACCP, and ISO 22000 programmes will be developed and tested in industrial settings with stakeholders who will participate. Software programmes, apps, process guidelines, checklists, and, if necessary, supporting essential equipment will be included.

The regulatory framework and accompanying regulations, technical guidance, and the role of government in supporting the governance of a rationale and transparent food safety certification system should be aligned with international best practices.

Table 5: Summary of Safegro Participatory Recommendations and Interventions

ITEM #	Recommendation	Additional Outcome
1	Support to develop of a national strategy for food safety certification	Policy and TA-related
2	Upgrade and harmonise existing food safety certification for VietGAP/VietGAHP and HACCP for specific VC actors with benchmarking against international standards.	The Ministry of Agriculture and Rural Development and the Ministry of Science and Technology should develop Good Livestock Practice Procedures and Good Aquaculture Practice Procedures into TCVNs to conform to the provisions of the Law on Standards and Technical Regulations.

3	Assist in drafting elements of the FSL associated with food safety certification, related decrees, circulars, and technical guidance to support improvements in the n the food safety certification system.	The BoA plays a critical role in ensuring the reliability and credibility of conformity assessment results in Vietnam, which helps improve the quality and safety of products and services, facilitates trade and market access, and protects consumer interests. Consideration should be given as to whether this must be a compulsory requirement.
4	Assist respective government agencies in establishing a certification governance and management system supported by a registration and certification database.	Consider the use of a unique identifier for all accreditation and conformity certificates. The Unique Identifier could be a GLN specified for the entity and thus uniquely traceable. Possibility of adding a 3D barcode to the certificates for security and fraud prevention. Collaboration should be discussed with GS1 to utilise the VNTP to form a national database. Database for all the Accredited Certification Bodies. Linked to the line ministry approvals. Database for all the scheme certifications. Linked to any line ministry approvals. Ability to search this nationally and confirm the validity of the certification.
5	Training and capacity building	ToT for food safety advisors to support mentoring of farmers, processors, and other VC actors to address self-assessed non-conformities.
		Farmer training programs
		Auditor training programs
		Inspector/regulator training programs
		e-Learning modules

6	Support the development and piloting of cost-effective food safety certification programs to support smallholder adoption of certification, including financial support and contracting.	Development of subsidies for smallholders to be able to access certification schemes and costs to be offset by government incentives.
7	Provide recommendations and models for consumer awareness raising through social media related to food safety certification to promote trust and transparency.	Collaboration with the retailers in Hanoi and HCMC
8	Develop food safety certification models in selected value chains with the application of digital technology.	Selected VCs in Hanoi and HCMC
9	Propose that the Ministry of Agriculture and Rural Development prescribe a unique VietGAP certification logo template throughout the country, making it easy for consumers to recognise and use VietGAP-certified products.	Participatory workshop to discuss a Single Logo Roadmap.

ANNEX A   INTERNATIONAL FOOD SAFETY CERTIFICATION FRAMEWORK

Most countries have adopted the CODEX-based[30] national food safety certification standards, but many non-regulatory third-party food safety certification schemes, known as vTPA, have emerged over the last two decades and are frequently a specific requirement for buyers in Vietnam and internationally. The major global food industry players make extensive use of vTPAs. Public-based food safety management systems (FSMS) (ISO 9001:2015, HACCP, and ISO 22000:2018) and industry-based FSMS and schemes benchmarked under the Global Food Safety Initiative are examples (GFSI). Despite this, implementing diverse FSMSs has not met the expectations and problems that have been raised over the years to address the requirements for domestic food safety in Vietnam as well as access to global agri-food supply chains. Escanciano and Santos-Vijande, 2014; Macheka et al., 2013).

Efforts were launched in the early twentieth century to develop and harmonise standards. The British Standards Institute (BSI) was the first standardisation body, established in 1901. The International Organization for Standardization was founded by the British Standards Institution (ISO). The local flexibility of certification programmes versus their global credibility is a significant issue and challenge for any standardisation effort.

Participatory consultation among various stakeholders in the standard-setting process is crucial to ensure the standard does not discriminate against specific producer or processor groups or create unattainable compliance requirements. Additionally, standard requirements should never include unnecessary criteria or become overly restrictive to achieve the standard's objective – safe food.

Identified Barriers to Implementing Food Safety Management Systems (FSMS)
According to some recent research findings, ninety-two per cent of respondents believe that the most significant barrier to effective food safety management systems is the absence of necessary programmes, 83.5% of respondents cited a lack of awareness of HACCP as the second-most significant barrier. (Baş and colleagues, 2007). Prerequisite programs (PRPs) and Good Manufacturing Practices (GMPs) need to be in place before an effective FSMS, HACCP can be implemented (HACCP Principles & Application Guidelines | FDA, n.d.).

PRPs currently include environmental requirements and operational processes as part of their scope of coverage. PRPs now consider the entirety of the FSMS rather than focusing solely on operational GMPs, which was the case in the past.

Glossary of Basic Concepts Associated with Food Safety Certification Programs.
- **Accreditation**: The evaluation and formal recognition of a certification programme by a national or international authority; also includes accreditation of certification bodies and their auditors.
- **Audit, auditor** See inspection, inspector, inspection body. The process by which a food business operator is inspected and evaluated for deficiencies or non-compliance and scored against a set of

criteria and checklists as specified by national standards or vTPA schemes. The auditor may be a government inspector for national standards or an accredited professional from a certification body.

- **Certification:** A procedure by which a third party gives written assurance that a product, process, or service conforms with specific standards or vTPA specifications.
- **Certification body (CB)**: An organisation accredited to perform certification audits, sometimes called the certifier or the certification agency. The certification body may use an existing standard or set its own specifications based on an international or normative standard to conduct audits against national standards or vTPA.
- **Certification label**: A label or symbol indicating compliance with specific standards has been verified. The national standard-setting body or international scheme owner typically controls the label and logo usage and maintains a publicly accessible database of certifications.
- **Certification programme:** A system of rules, procedures, and management for conducting certification. Sometimes referred to as a certification system or scheme. One certification body may be accredited to execute several certification programmes and related audits.
- **Control, control body:** Terms commonly used to refer to the authorised government inspection and an inspection body; may be the recognized "competent authority" internationally.
- **Inspection:**[31] An onsite visit to verify that an operation's performance follows specific certification programme standards.
- **Inspector:**[32] The person appointed to undertake the inspection audit may be an independent operator/auditor or a team member of the certification scheme owner. Inspector is usually applied to government auditors whereas auditors references vTPA staff.
- **Inspection body:**[33] The body performing the inspection part of certification. Where a certification body performs its own inspections for vTPA, the certification body is also the inspection body.
- **Licence:** A document issued under the rules of a certification programme by which a certification body grants a person or body the right to use certificates or certification labels for its products, processes, or services following the rules of the relevant certification programme.
- **Standards:** Documented agreements containing technical specifications or other precise criteria to be used consistently as rules, guidelines, or definitions to ensure that materials, products, processes, and services fit their purpose. Standards include environmental standards, organic standards, labour standards, social standards, and normative standards.
  The following standards may be governmentally enforced or are voluntary standards for industry.
  - o Environmental standards are standards for materials, products, and production processes to ensure that environmental negative impacts are minimal or kept within certain limits.
  - o Organic standards are standards for producing and processing organic food products.
  - o Labour standards are standards for working conditions to ensure workers' rights are respected.
  - o Social standards can mean labour standards but can also include standards on other social aspects of organisations and production facilities, such as the relation with neighbouring communities.
  - o Normative standards are generic (general or non-specific) standards or guidelines for local standard-setting or certification bodies to be used as a framework when formulating a specific standard for their certification programme. Normative standards are called Standards for Standards, e.g., the IFOAM Basic Standards and FAO/WHO Codex Alimentarius guidelines.[34]

SAFEGRO

Agreement on Technical Barriers to Trade

The International Technical Barriers to Trade (TBT) Agreement aims to ensure that government-applied technical regulations, standards, and conformity assessment procedures are non-discriminatory and do not create unnecessary obstacles to trade. At the same time, it recognises World Trade Organization (WTO) members' rights to implement measures to achieve legitimate policy objectives, such as **protecting human health and safety or protecting** the environment. The TBT Agreement strongly encourages members to base their **effort**s on international standards to facilitate trade. Its **transparency provisions** also aim to create a predictable trading environment.

The WTO is the sole worldwide international organisation concerned with international trade laws. At its core are the WTO accords, negotiated, signed, and accepted by most of the world's trading states and their respective parliaments. Its primary purpose is to ensure trade flows as freely, reliably, and smoothly as possible. The WTO, created in 1995 with over 130 members, is the General Agreement on Tariffs and Trade (GATT) successor. The GATT Agreement of 1994 is currently the most binding WTO agreement governing trade in goods. The system encourages nations to resolve disagreements through consultation. If they are unsuccessful, they may follow a step-by-step procedure that includes the potential of a ruling by a panel of experts and the opportunity to appeal the verdict. (WTO, n.d.-b, n.d.-a)

CODEX

The Codex Alimentarius[35], or "Food Code", is a collection of standards, guidelines and codes of practice adopted by the Codex Alimentarius Commission (Codex) aligned with the WTO. The Commission, also known as CAC, is the central part of the Joint FAO/WHO Food Standards Programme and was established by FAO and WHO to protect consumer health and promote fair practices in the food trade. The Codex Alimentarius is a collection of internationally adopted food standards and related texts intended to protect consumers' health and ensure fair agri-food trade practices. The Codex Alimentarius is meant to guide and promote the creation and establishment of food definitions and requirements to aid their harmonisation and facilitate international trade.

The Codex includes standards for all the principal foods, whether processed, semi-processed or raw, for distribution to the consumer. Ingredients, additives, and materials for further processing into foods should be included to the extent necessary to achieve the purposes of Codex as defined. The Codex includes provisions regarding food hygiene, food additives, pesticides and veterinary drug residues, contaminants, labelling and presentation, methods of analysis and sampling, and import and export inspection and certification.

Codex standards and related texts are not substitutes for or alternatives to national legislation. Every country's law and administrative procedures contain provisions with which it is essential to comply. In most countries, the national food safety standards are aligned with CODEX. In addition, the vTPA scheme standards or specifications are supposed to align with CODEX.

Codex standards and related texts contain requirements for food to ensure the consumer a safe, wholesome food product free from adulteration, correctly labelled and presented. A Codex standard for

any food or foods should be drawn up in accordance with the Format for Codex Commodity Standards and contain, as appropriate, the sections listed therein.
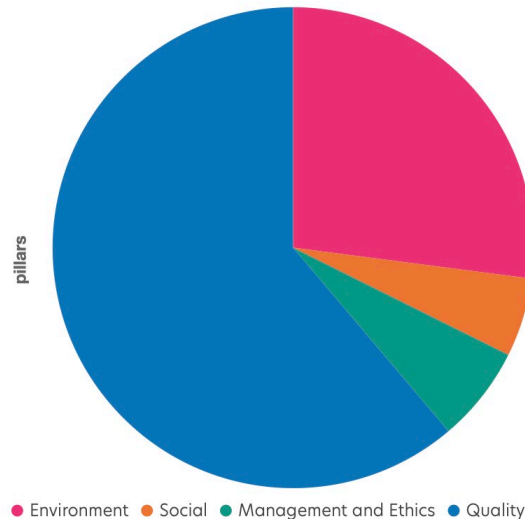
Figure 12: Overview of the compliance criteria for Codex (Source ITC Standards 2020)

Codex General Principles of Food Hygiene define Food Hygiene as "All conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain; Properly applied prerequisite programmes, including Good Hygiene Practices (GHPs), Good Agricultural Practices (GAPs), Food Safety (FS) and Good Manufacturing Practices (GMPs), along with training and traceability, and should provide the foundations for an effective HACCP system[36].

HACCP

Hazard Analysis and Critical Control Points (HACCP) is an internationally recognised set of principles for identifying hazards, assessing risks, and ultimately mitigating food safety risks. HACCP is used as the FSMS by a wide range of food business operators (FBOs) to ensure that all the food they produce is safe. In the 1960s, NASA, the Pillsbury Company, and the United States Army Laboratories collaborated to develop HACCP to provide safe food for upcoming space missions. The Critical Control Points engineering management standards developed by NASA were chosen as a guideline for this food safety programme. Critical Control Points (CCP) had previously been used to validate the dependability of equipment and engineering systems. Using HACCP, NASA and Pillsbury hired contractors to identify and eliminate "critical failure spots" in food processing systems.

Following NASA's success in providing safe food for their space missions, Pillsbury recalled Farina, an infant cereal, after discovering glass fragments and residue in the meal. Howard Baumann, a microbiologist at Pillsbury who also worked with NASA, advised the company to implement a HACCP strategy for food manufacturing. A 1971 National Conference on Food Protection panel advocated using Critical Control Points (CCPs) and Good Manufacturing Practices (GMPs) to produce safe food. As a result, the USFDA asked Pillsbury to design and oversee a training programme for FDA inspectors on canned food inspection. The program began in September 1972 and lasted 21 days, including 11 days of classroom

lectures and 10 days of canning factory evaluations. The "Food Safety Using the Hazard Analysis and Critical Control Point System" course was the first time HACCP was used to teach food sector facilities. HACCP has become a global industry standard and will continue to impact food safety and the food industry for many years.

HACCP PRINCIPLES[37]

HACCP is a systematic approach to the hazard identification, characterization, evaluation, and control of food safety hazards based on the following seven principles:

Principle 1: Conduct a hazard analysis.
Principle 2: Determine the critical control points (CCPs).
Principle 3: Establish critical limits.
Principle 4: Establish monitoring procedures.
Principle 5: Establish corrective actions.
Principle 6: Establish verification procedures.
Principle 7: Establish record-keeping and documentation procedures.

In addition to the seven principles, 12 steps must be followed to complete the process.[38]

1. Assemble and train the HACCP Team.
2. Describe the products and processes.
3. Identify intended users.
4. Construct a flow diagram.
5. Validate the flow diagram.
6. Conduct a Hazard Analysis (Principle 1)
7. Determine the critical control points (CCPs) (Principle 2)
8. Establish critical limits for each CCP (Principle 3)
9. Monitoring of control measures at each CCP (Principle 4)
10. Establish corrective actions (Principle 5)
11. Establish Verification procedures (Principle 6)
12. Establish documentation and record-keeping (Principle 7)

Prerequisite Programs (PRPs)

Prerequisite programs (PRPs) serve as the sanitary basis for all food activities. In various regions of the world, the terms PRPs, Good Manufacturing Standards (GMPs), Good Hygienic Practices (GHPs), and sanitary standard operating practises (SSOPs) are interchangeable but convey the exact definition (Figure 2). These provide the pre-conditions for an effective HACCP program.

Figure 13: Prerequisite programmes (PRPs) adapted from What is a management system?

Figure 2 illustrates the relationship between PRPs and HACCP. PRPs are regarded as the primary basis on which HACCP depends. "Systems thinking" can be utilised to aid in the resolution of complicated food contamination issues and to provide a framework for modelling solutions to pressing food safety concerns. Problem-solving and critical thinking are elements of systems thinking.
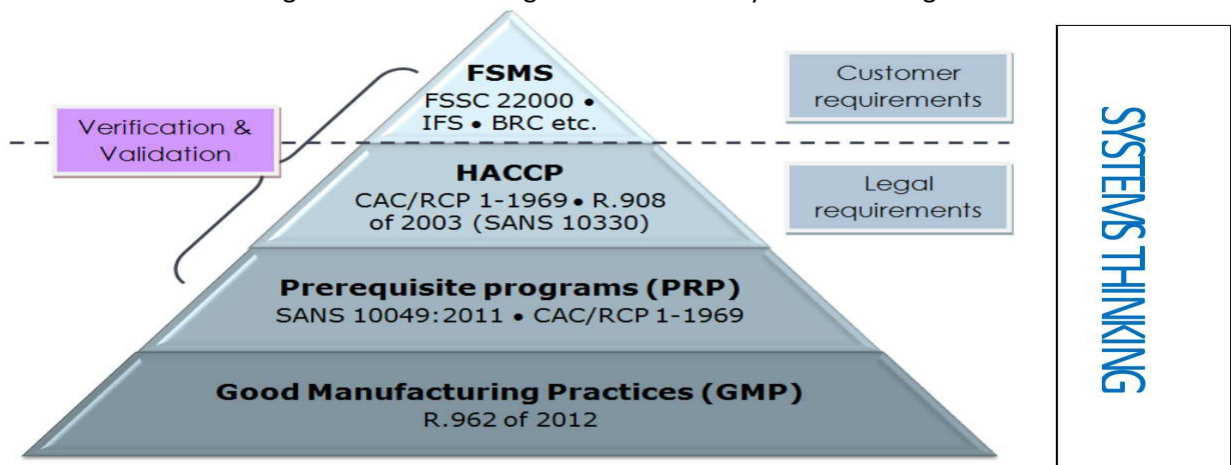
Figure 14: Adapted from Prerequisite Programs Ensure Food Safety.

Figure 15: The interaction between FSMS, necessary good management practices, positive food safety culture and systems thinking Source: Adapted from "Food Safety for the 21st Century", (Figure 9.2, page 164) Wallace et al., n.d.

To simplify the complexity of the HACCP plan and ensure that a supplier verification mechanism is in place, the HACCP system must be constructed on a firm foundation of PRPS.

PRPs are defined by the World Health Organisation as "important food safety procedures that must be carried out prior to and during HACCP implementation. "The manufacture of safe food necessitates that the HACCP system be built on a solid foundation of PRPS to simplify the complexity of the HACCP plan and ensure that a supplier verification mechanism is in place.

The World Health Organization defines PRPs as "important food safety procedures that must be undertaken before and during HACCP implementation[39]."

ISO

The concept that a quality management system could affect the quality of a product or service was initially presented in the 1970s. At the time, it was promoted in several large organisations, such as Ford and the United States Department of Defence (DOD), both of which released their quality management standards. Because it worked with various suppliers, the Department of Defence significantly influenced the

implementation of FSMS. This allowed it to ensure that all their food suppliers complied with the requirements of their quality management standards.

The British Standards Institute (BSI) released the first standard for the United Kingdom in 1971 under BS 9000. This standard was developed specifically for the electronic industry. In addition, they distributed the BS 5179 and 5750 standards, which were founded on the standards established by the Ministry of Defence. For the first time, these shifted the responsibility of quality assurance away from the customer and onto the supplier, with the implementation of third-party auditors to carry out inspections.

It wasn't until the 1980s that the International Organization for Standardization began incorporating the UK's standards into their international certification guidelines and requirements. In 1987, they released the first version of ISO 9000.

Since then, there has been a gradual shift from end-product testing to a more proactive approach that employs risk-based food safety management systems to enable preventative measures and increase trust and transparency throughout the supply chain.

Changes in Food Safety Certification

ISO 9001:1987 had a tight structure with twenty requirements, but it focused on conforming to procedures, and the big picture of creating a high-quality process was somewhat lost. ISO 9001:1994 had similar problems with enforcing conformity. Organisations struggled under the pressure of rules and regulations, putting together heavy manuals that often stifled the process rather than helping it.

ISO 9001:2000 saw the most significant changes since ISO 9001 was introduced. It resolved some problems and sought to create a standard focused on the growth of the business and the development of a Food Safety mindset. Rather than hefty manuals and documents dictating the running of a Quality Management System (QMS), the day-to-day operations dictated the documentation. This third edition emphasised ISO 9001 was intended as a quality management "system" via process performance measures. Audited documentation is used to verify that the food safety management process is running effectively. It introduced eight fundamental principles:

- Focus on the customer.
- Effective leadership
- Engaging people at all levels of the company
- A process-based approach to management
- Looking to improve continually.
- Decision-making is based on evidence and data.
- A focus on a mutually beneficial relationship between supplier and customer
- Traceable consistency

These eight principles created much more freedom for companies to develop QMSs that suited their business while still meeting their responsibility for high-quality food safety standards. The next update, the ISO 9001:2008, sought to make the requirements of the previous ISO more transparent and to improve the way it fitted with other standards, such as the ISO 14001.

The most recent edition, ISO 9001:2015, was launched to ensure that the ISO reflected the latest developments in good QMS practice. It made changes to provide easier integration with other ISOs and management systems, along with less prescriptive requirements, allowing the FBO to create a QMS that suits its unique needs.

ISO 9001 TODAY

Over one million organisations worldwide have achieved ISO 9001 certification, making it one of the world's most widely used management tools. The UK had over 40,200 certified companies in 2014, which has risen recently. Similar developments have occurred in the United States with the FDA Food Safety Modernisation Act (FSMA) and in Canada with the Safe Food for Canadians Act (SFCA), emphasising risk-based preventative controls in auditable food safety management systems.

ISO 22000

ISO 22000 is the most widely applied voluntary international food safety standard in the food industry, with 42,937 sites certified (ISO Survey 2021). The ISO 22000 family is an international voluntary consensus standard which aligns with Good Standardization Practices (GSP)[40] and the World Trade Organization (WTO) Principles for the Development of International Standards[41], defining the requirements for a Food Safety Management System (FSMS) and incorporating the following elements defined as FSMS principles:

- Interactive communication
- System management
- Prerequisite programs
- HACCP principles

Communication along the food chain is essential to ensure that all relevant food safety hazards are identified and adequately controlled at each step within the food chain and among organisations both upstream and downstream in the food chain. Communication with customers and suppliers about identified hazards and control measures will assist in clarifying customer and supplier requirements. Recognition of each organisation's role and position within the food chain is essential to ensure effective interactive communication to deliver safe food products to consumers.

ISO 22000 and HACCP

ISO 22000 has two Plan-Do-Check-Act (PDCA) cycles, which operate inside each other, the first covering the management system and the second the operations (described in ISO 22000:2018, Clause 8), which simultaneously covers the HACCP principles.

ISO 22000 references the Codex Alimentarius General Principles of Food Hygiene, CXC 1-1969[42]
- Control monitoring and measuring (operational processes) **Subclause 8.7**
- Conduct a verification related to the PRPs and hazard control plan. **Subclause 8.8**
- Update the preliminary information. **Subclause 8.6**
- HACCP steps 5 and 7.

- ISO 22000 Food Safety Management System (FSMS), HACCP and the PRPs are the foundation of HACCP in preventing foodborne outbreak[11] In addition, another study for HACCP effectiveness between ISO 22000 certified and non-certified dairy companies identified that by implementing the HACCP Food Safety System (FSS) and by being ISO 22000 certified, the level of achievement of the HACCP objectives is improved significantly[43]

ISO 22000 family of standards

ISO published additional standards that are related to ISO 22000, known as the ISO 22000 family of standards made up of the following:

- ISO 22000 – Food safety management systems – Requirements for any organisation in the food chain.
- ISO 22001 – Guidelines on applying ISO 9001:2000 for the food and drink industry (replaces: ISO 15161:2001 Withdrawn).
- ISO/TS 22002- Prerequisite programmes on food safety
  - o Part 1: Food manufacturing.
  - o Part 2: Catering.
  - o Part 3: Farming.
  - o Part 4: Food packaging manufacturing.
  - o Part 5: Transport and storage.
  - o Part 6: Feed and animal food production
- ISO/TS 22003 – Food safety
  - o Part 1: Requirements for bodies providing audit and certification of food safety management systems.
  - o Part 2: Requirements for bodies providing evaluation and certification of products, processes, and services, including an audit of the food safety system.
- ISO/TS 22004 – Food safety management systems – Guidance on applying ISO 22000:2005.
- ISO 22005 – Traceability in the feed and food chain – General principles, basic system design, and implementation requirements.
- ISO 22006 – Quality management systems – Guidance on applying ISO 9002:2000 for crop production.
  ISO 22000 is also a basis for the Food Safety Systems Certification (FSSC) Scheme FSSC 22000. FSSC 22000 is a Global Food Safety Initiative (GFSI) approved scheme called a certification programme owner (CPO). The differences between ISO 22000 and schemes with GFSI recognition are explained in a paper from ISO, International standards, and private standards.

Voluntary Third-Party Assurance Programme (vTPA)

Voluntary Third-Party Assurance (vTPA) programmes are comprised of food safety certification through autonomous schemes that are typically privately owned. These schemes own the copyright of a standard that may incorporate national or international requirements. Additionally, these programmes apply a governance structure for certification and conformity assessment, which includes periodic onsite audits

of FBOs to ensure that they are conforming to the specifications outlined in the standard. Finally, FBO participation in these programmes is voluntary.

FBOs are primarily responsible for managing their products' safety and complying with regulatory requirements for food under their control. Competent Authorities (CA) of a country may require FBOs to demonstrate that they have adequate controls and procedures to protect consumers' health and ensure fair practices in the food trade. Many FBOs use quality assurance systems, including vTPA programmes, to reduce supply chain risks and assure food safety outcomes.

The Codex Principles and Guidelines for National Food Control Systems foresee competent authorities applying quality assurance systems in their national food control system (NFCS). Competent authorities may choose to do this by establishing an arrangement with a vTPA owner to use the information/data generated by the vTPA programme to complement but not replace their risk-based regulatory controls. They should also verify that any information/data considered through vTPA is reliable and valuable.

The vTPA assessment and use guidelines are intended to help competent authorities consider vTPA projects to supplement regulatory compliance requirements. They provide a framework and criteria for assessing the integrity and credibility of vTPA programme governance structures and the dependability of information/data provided by such programmes to support NFCS objectives. Competent authorities should be guided by their intended use of the vTPA programme information/data when completing such an assessment.

Reliable vTPA programme information/data may be used to better risk-profile sectors and, in some circumstances, inspection frequency of individual FBOs. This may lead to more intelligent data-driven prioritisation of official resources. At the same time, FBOs participating in robust vTPA programmes may benefit through an appropriate risk-based reduction in the frequency/intensity of regulatory controls, inspection, and sampling. Conversely, poorly performing FBOs or sectors may be subject to increased official regulatory controls based on trends identified through the information/data shared by the vTPA owner.[44]

Worldwide retailers

The world's leading retailers have been instrumental in the development of vTPAs. They have developed guidance, guidelines, and even third-party auditable standards over the last 30 years that must be implemented to supply goods into their retail systems. These standards are based on GAP, Ethical, and Sustainable production while considering regulatory, technical, quality, and consumer-driven criteria. These are some examples of such retailers:

Country	Retailer	Scheme
UK	Marks and Spencer	Select Grower[45]
UK	Tesco	Nurture[46]
Germany	Albert Hien	Global Standard requirements GGN, MSC, etc [47]

Worldwide	Walmart	Internal Auditing and requirements plus global certification[48]
Vietnam	Lotte	Internal policies and requirements[49]
Vietnam	Winmart	Internal policies and requirements
Vietnam	Bac Hoa Xan	Internal policies and requirements
Vietnam	Aeon Mall	Internal policies and requirements[50]

Because of the development of these proprietary in-house schemes, suppliers and food manufacturers worldwide must also meet and comply with these requirements. They typically become third-party certified to supply the retailers.

The industry governs itself primarily to raise awareness and compliance within the manufacturing and production sectors and to reduce food safety risks to their business, with third-party auditing confirming compliance.

FSSC[51]

FSSC, as one example of a vTPA, provides trust and delivers significant credence to the consumer goods industry. FSSC is a global non-profit and independent scheme owner of ISO Management System-based certification schemes and related development programs.[52]

FSSC 22000 has been delivering an impact on global food safety for over 12 years. The scheme provides a certification model that can be used in the whole food supply chain to ensure food safety standards and processes. FSSC 22000 is GFSI recognised and follows the food chain category description as defined in ISO/TS 22003

GFSI[53]

The Global Food Safety Initiative (GFSI) is a private, industry-led organisation that works as a "coalition of action" affiliated with the Consumer Goods Forum (CGF), bringing together retailers and brand owners (manufacturers) from across the CGF membership, to create "an extended food safety community to oversee food safety standards for businesses and help provide access to safe food for people everywhere." GFSI's benchmarking and harmonisation work aims to promote mutual acceptance of GFSI-recognized certification programmes across the industry to enable a "once certified, accepted everywhere" approach. The Coalition comprises 43 committed Consumer Goods Forum members, including PepsiCo, Coca-Cola, Sainsbury's, Walmart, McDonald's, Starbucks, and Aeon.

The GFSI standard seeks to improve food safety and business efficiency. GFSI's benchmarking and harmonisation work promotes mutual acceptance of GFSI-recognized certification programmes across the industry, allowing for a simplified "once certified, recognised everywhere" approach. This is intended to reduce inefficiencies caused by audit duplication and aids in reducing trade barriers. The GFSI Benchmarking process is now widely accepted throughout the food industry.

Numerous private vTPA schemes, benchmarked by GFSI worldwide, address various aspects of quality management, environmental and social responsibilities, and food safety and culture.

GLOBAL GAP[54]

GlobalGAP is another example of a branded vTPA for on-farm quality assurance and good agricultural practices. The origins of GLOBALG.A.P. may be traced back to EUREPGAP, a project started in 1997 by retailers involved in the Euro-Retailer Produce Working Group. British merchants are becoming more mindful of consumers' growing worries about food safety, the environment, and the health, safety, and welfare of humans and animals as they collaborate with supermarkets in continental Europe. Their response was to Harmonise internal policies and practices and create a separate certification program for good agricultural practices (GAP).

The EUREPGAP guidelines assisted companies in adhering to the widely recognised requirements for food safety, environmentally friendly production practices, worker and animal welfare, and prudent use of water, compound feed, antibiotics, and plant propagation materials throughout Europe. Producers might save money because of standardised certification because they wouldn't have to submit to as many audits each year against various standards. The process extended across the continent and beyond during the following ten years. Growing numbers of producers and retailers worldwide joined in because of the effects of globalisation, giving the European organisation international recognition.

EUREPGAP changed its name to GLOBALG.A. P in 2007 to reflect its global scope and ambition to become the leading international GAP standard.

Today, GLOBALG.A.P. is the leading farm assurance program in the world, transforming consumer demands into Good Agricultural Practices in 135 countries.

Figure 16: Overview of the compliance criteria For the GlobalGAP Schemes (Source ITC 2020)

9.1.1 Soil Association: UK Organic Standard[55]

The Soil Association was founded in 1946 by a group concerned about the health implications of increasingly intensive farming systems following the Second World War. Their main concerns were:

- The loss of soil through erosion and depletion
- Decreased nutritional quality of food.
- Exploitation of animals
- Impact on the countryside and wildlife

Since 1967, the Soil Association has set standards for organic food. These provide guidance and give recognition to farmers using nature-friendly production methods and high animal welfare practices.

In 1972, they were one of the founding members of IFOAM, the worldwide umbrella organisation for the organic movement.

Soil Association Certification is a wholly owned subsidiary of the charity. The not-for-profit business certifies organic products to Soil Association standards and is one of only six UK-approved control bodies. ("Our history | Soil Association") It also offers various organic and sustainable certification schemes across food, farming, catering, health and beauty, textiles, and forestry.

Soil Association Certification was launched in 1973 when there was increasing demand for a system that proved high-quality food was made with integrity.

Today, it still provides that reassurance. The Soil Association's organic symbol is more than just a trademark: it represents a set of standards developed to achieve our aims and embody our organic principles of ecology, fairness, care, and health.

70% of organic food in the UK is certified by Soil Association Certification[56].
The UK Government website has further information on Organic Production in the UK and is available publicly[57].

USDA Organic[58]

The National Organic Program (NOP) of the USDA oversees developing the rules and regulations that govern the production, handling, labelling, and enforcement of all organic products sold by the USDA. The National Organic Standards Board is a Federal Advisory Committee with fifteen members representing the public serving on it. Their input is being solicited as part of this rule-making process. The NOP also keeps a handbook communicating organic standards, including guidance, instructions, policy memos, and other documents. (For further information, consult the NOP handbook published by the USDA and the AMS).

Rain Forest Alliance[59]

The Rainforest Alliance is an international non-profit organisation that works at the intersection of business, agriculture, and forests to make businesses liable and responsible for quality, safety, and sustainability as the new normal. This work is done at the intersection of business, agriculture, and forests. They are building an alliance to protect forests, improve the livelihoods of farmers and forest communities, promote the communities' human rights, and assist the communities in mitigating and adapting to the effects of climate change. This plan is not primarily a food safety initiative.

BAP-Aquaculture[60]

The Best Aquaculture Program (BSP) under the Global Seafood Alliance is the most prominent seafood-specific certification program that can certify every step in the production chain. The process starts with hatcheries and ends in a processing plant where product is prepared for delivery.

The BAP programme is based on independent audits that evaluate compliance with the BAP standards developed by the GAA. The GAA Seafood Processing Standard has also been benchmarked by the CGF's Global Food Safety Initiative (GFSI)[61]. Being recognised by the gatekeepers of international certification standards is very important to the integrity of the BAP program.

Ethical Trading Initiative: SEDEX/SMETA (Supplier Ethical Data Exchange / Sedex Members Ethical Trade Audit)[62]

The Ethical Trade Initiative was set up to allow members to be certified in good practices regarding Ethical Trading; incorporated in this is a specific standard. Corporate members of ETI agree to adopt the ETI Base Code of Labour Practice, which is based on the standards of the International Labour Organisation (ILO). SEDEX determined the most effective steps companies can take to implement the Base Code in their supply chains. These ETI projects and working groups generate and test new ideas, frequently piloting

these approaches in sourcing countries. Members establish good practices in ethical trade by participating in these groups and roundtable discussions. Training materials are then created, and resources are allocated to capture this knowledge, providing practical tools to assist businesses in implementing their ethical trade policies.

Overview

● Environment ● Social ● Management and Ethics ● Quality
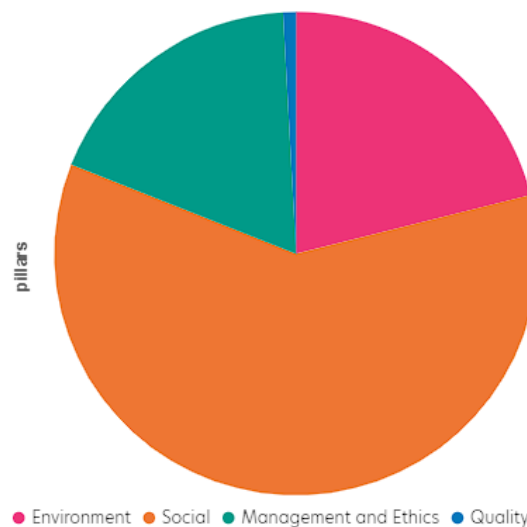
Figure 17: Overview of the compliance criteria for SMETA (Source ITC 2020)

BRCGS[63]

This company was founded in 1996 by retailers seeking to standardise food safety standards throughout the supply chain. Today, its BRC scheme is recognised globally across food and non-food categories and operates one of the most stringent third-party certification schemes.

BRCGS is a market-leading global brand that contributes to supply chain trust. Their Global Standards for Food Safety, Packaging Materials, Storage and Distribution, Consumer Products, Agents and Brokers, Retail, Gluten Free, Plant-Based, and Ethical Trading set the standard for good manufacturing practise and help customers feel confident that their products are safe, legal, and of high quality.

Figure 18:Overview of the compliance criteria for the BRC scheme (Source ITC 2020)

Figure 19: Evolution of BRCS (Source BRCS)

ANNEX B   SUMMARY GAP, HACCP AND CERTIFICATION ACTIVITIES ACCORDING TO THE LAW IN VIETNAM

Hoang Phu Quyen

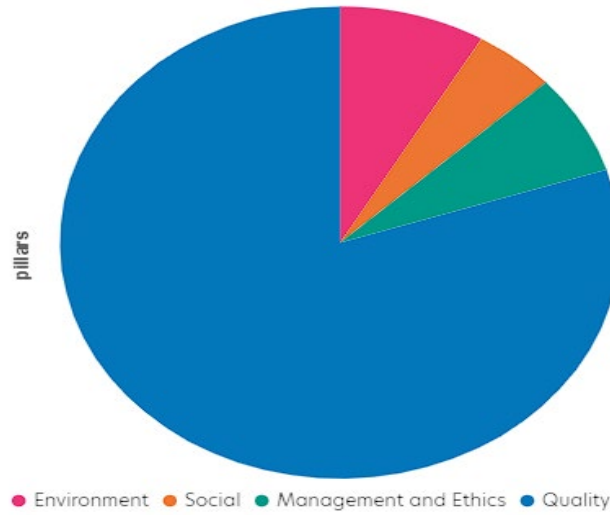| TT	Content	Base
I	**REGULATIONS ON CERTIFICATE ORGANIZATIONS**	
	Conformity assessment is the determination of objects of activities in the field of standards and objects of activities in the domain of technical regulations in accordance with technical characteristics and management requirements specified in relevant standards and relevant technical regulations. Conformity assessment includes testing, calibration, inspection, standard conformity certification, regulation conformity certification, standard conformity announcement, regulation conformity announcement, and accreditation of the capacity of testing and calibration laboratories., conformity certification body, and inspection organization.	Clause 5. Article 3 Law on Standards and Technical Regulations
	Conformity assessment organization is an organization that conducts activities of testing, inspecting, verifying, and certifying the conformity of products, goods, production processes and service provisions in accordance with public standards. applicable regulations and relevant technical regulations.	Clause 8. Article 3 Law on product quality Clause 1, Article 3 of Decree 107/2016/ND-CP
	A designated conformity assessment organization is an organization that meets the conditions specified in Clause 5, Article 25 of this Law and has been considered and decided by a competent state management agency to publish a list to organize such an organization. Production and business organizations and individuals use conformity assessment services to serve state management requirements.	Clause 9. Article 3 of the Law on Product Quality
	Certification is the assessment and certification of the conformity of products, production processes, and service provision with announced applicable standards (called standard conformity certification) or technical regulations (called standard certification) acceptance).	Clause 12. Article 3 Law on product quality
	Standard is a regulation on technical characteristics and management requirements used as a standard to classify and evaluate products, goods, services, processes, environment, and other objects in socio-economic activities. associations to improve the quality and effectiveness of these objects.	Clause 1. Article 3 Law on Standards and Technical Regulations

	Standard published by an organization in writing for voluntary application.	
	Technical regulation is a regulation on the limits of technical characteristics and management requirements that products, goods, services, processes, environment, and other objects in socio-economic activities must meet compliance to ensure safety, hygiene, and human health; protection of animals, plants, and the environment; protect national interests and security, consumer interests and other essential requirements. Technical regulations are harmonised by competent state agencies in written form for compulsory application.	Clause 2. Article 3 of the Law on Standards and Technical Regulations
	Certification of conformity confirms that the subject matter of activities in the field of standards conforms to the corresponding standard.	Clause 6. Article 3 Law on Standards and Technical Regulations
	Certification of technical regulation conformity is the certification that the object of activities in the domain of technical regulation conforms with the corresponding technical regulations.	Clause 7. Article 3 Law on Standards and Technical Regulations
	Accreditation confirms that a testing laboratory, calibration laboratory, conformity certification body, or inspection body can conform to the standards.	Clause 10. Article 3 of the Law on Standards and Technical Regulations
	Form of conformity assessment 1. The conformity assessment with standards and technical regulations shall be done by conformity assessment organizations or organizations or individuals declaring conformity. 2. Assessment of conformity with standards is carried out voluntarily at the request of organizations and individuals through testing, assessment, standard conformity certification and standard conformity announcement. 3. Assessment of conformity with technical regulations shall be carried out compulsorily at the request of state management in the form of testing, assessment, regulation conformity certification and regulation conformity announcement.	Article 41. Law on Standards and Technical Regulations
	Certificate of Conformity 1. Standard conformity certification shall be made according to an agreement between an organization or individual wishing to be certified with a conformity certification organization specified in Article 50 of this Law. 2. Standards used to certify standard conformity are national, international, regional, or foreign standards that satisfy the requirements specified in Article 42 of this Law.	Article 44. Law on Standards and Technical Regulations

	Certificate of conformity 1. Regulation conformity certification is compulsory for products, goods, services, processes, and environment that fall under the subjects specified in the respective technical regulations. 2. Technical regulations used for certification of regulation conformity are national technical regulations or local technical regulations that satisfy the requirements specified in Article 42 of this Law.	Article 47. Law on Standards and Technical Regulations
	Conformity certification bodies 1. non-business units providing technical services. 2. Enterprise. 3. Branches of foreign certification organizations in Vietnam.	Article 50. Law on Standards and Technical Regulations
	Conditions of operation of the conformity certification body The conformity certification body must meet the following conditions: 1. Having an organizational structure and capacity to meet the requirements of national and international standards for conformity certification organizations. 2. Establish and maintain a management system in accordance with the requirements of national and international standards. 3. Register standard conformity certification and regulation conformity certification activities at competent state agencies.	Article 51. Law on Standards and Technical Regulations
Ftable	GAP_HACCP CERTIFICATE ORGANIZATION IN VIETNAM	
	GAP_HACCP certificate classification: GAP certification: Type of product certification. HACCP certification: Type of certification of the food safety management system (hazard analysis and critical point control system)	
II	Register the field of operation according to the provisions of Decree 107/2016/ND-CP	
	Conditions for providing product and management system certification services 1. An organization established in accordance with law. 2. Having a management system and operational capacity that meets the requirements specified in national standards, international standards, and international guidelines for each of the following respective types: a) National standard TCVN ISO/IEC 17065:2013 or international standard ISO/IEC 17065:2012 or national standard, international standard for specialized certification and related guidelines of the Forum the	Article 17. Decree 107/2016/ND-CP. Clause 1, Article 3, Decree 154/2018/ND-CP

	International Accreditation Forum (IAF) or the standard corresponding to the requirements of the specific certification program for product and goods certification activities. b) National standard ISO/IEC 17021-1:2015 or international standard ISO/IEC 17021-1:2015 and related guidelines of the International Accreditation Forum (IAF) or equivalent standard meet the requirements of a specific certification scheme for management system certification. 3. There are at least 04 official assessors of the organization (officers or employees signed with a term of 12 months or more or an employee with an indefinite term contract), meeting the following conditions: a) Having a university degree or higher and relevant expertise for the certification program. b) Receive training and be granted a certificate of completion of the training course on corresponding assessment and certification skills at a training institution announced or recognized by the Ministry of Science and Technology in accordance with law. To be trained and granted a certificate of completion of a training course on specialized product certification techniques in accordance with specialized laws, in case such regulations; ~~c) Having 3 or more years of working experience (from the time of university graduation) and working experience in accordance with the requirements specified in the respective certification program.~~ Repealed by Clause 1, Article 3, Decree 154/2018/ND-CP d) Having experience in auditing 04 or more times, with at least 20 working days in auditing for the respective certification program. In case of additional certification activities, there must be at least 02 official experts of the organization (officials or employees with contracts with a term of 12 months or more or employees with an indefinite contract). term) corresponding to each additional registration certification area, satisfying the conditions specified in this clause.	
	The body that issues the certificate of registration of the field of conformity certification activities : 1. Dossier-receiving agency: a) The agency that receives the application for registration of product certification activities according to the principles specified in Article 4 of this Decree. b) The agency that receives the application for registration of management system certification activities is assigned the responsibility for implementation by the Ministry of Science and Technology.	Article 18. Decree 107/2016/ND-CP
	Article 4. Principles of operation registration 1. Conformity assessment organizations wishing to register conformity assessment activities for products, goods, production process, service provision, process, and environment (hereinafter referred to as: is the	Article 4. Decree 107/2016/ND-CP

	object of conformity assessment) in a major under the responsibility and state management of a line ministry, according to its assigned functions, tasks and powers, registration shall be carried out at the ministry. management of the industry, the field of management of that object. 2. Conformity assessment organizations that wish to register conformity assessment activities for objects of multi-disciplinary general conformity assessment under the management responsibility of two or more line ministries Then, register the operation at the Ministry of Science and Technology. 3. Conformity assessment organizations that wish to register conformity assessment activities with two or more specialized conformity assessment subjects under the management responsibility of two or more line ministries. The registration of operations at the line ministries and the field management of each respective object.	
	According to Articles 4 and 17 of Decree 107/2016/ND-CP: The body issuing the registration certificate for certification of management systems, including quality and food safety management systems: General Department of Standards, Metrology and Quality (an agency under the Ministry of Science and Technology) and technology). The specialised management ministries are the agency that issues the product certification registration certificate. For the Ministry of Agriculture and Rural Development: To comply with Decision No. 3322/QD-BNN-KHCN dated August 8, 2017, assigning tasks to the heads of the General Departments, Departments, Departments of Science, Technology and Environment. on granting, revoking, Certificate of registration of testing, inspection, assessment, and certification activities. General Departments, Departments under the Ministry of Agriculture and Rural Development: according to the scope of functions and tasks assigned to manage. For example, the Department of Crop Production grants operation registration to the organization that certifies VietGAP cultivation; the Department of Livestock Production grants operation registration to VietGAP certification organizations in livestock production; The Directorate of Fisheries issues operation registration for VietGAP seafood certification organization. The NAFIQAD Department issues registration of areas of operation to certification organizations with a certification scope of 02 or more fields. For example, the NAFIQAD Department grants operation registration to the VietGAP certification organization for cultivation, husbandry, and aquaculture. Pursuant to Clause 3. Decree 107/2016/ND-CP: For certification organizations that have a multi-disciplinary integrated certification field under the management responsibility of two or more-line ministries, they shall register. operates at the Ministry of Science and Technology (General Department of Standards, Metrology and Quality).	

Article 4. Agency appointing and supervising the operation of the VietGAP certification organization. 1. The Directorate of Fisheries is the agency that appoints and supervises the activities of VietGAP certification organizations in the fisheries sector. 2. Department of Crop Production is the agency that appoints and supervises the activities of VietGAP certification organizations in the field of crop production. (Amended by Article 1. Circular 06/2018/TT-BNNPTNT). 3. Department of Livestock Production is the agency that appoints and supervises the activities of VietGAP certification organizations in the livestock sector.	Article 4. Circular 48/2012/TT-BNNPTNT. Article 1. Circular 06/2018/TT-BNNPTNT amending Circular No. 48/2012/TT-BNNPTNT.
For current GAP certification: Certification Criteria: Vietnam standard: Cultivation field: issued TCVN 11892-1:2017. Animal husbandry: not yet harmonised TCVN. Aquaculture sector: draft TCVN has been developed, not yet officially issued for application. Regional Standard: AseanGAP. International Standard: GlobalGAP. GAP certification organizations in Vietnam: For GlobalGAP certification, VietGAP crops according to TCVN 11892-1:2017: Register the field of activity at the Department of Crop Production (MARD) / or the Quality Management Department of Agro-Forestry and Fisheries (NAFIQAD - Ministry of Agriculture and Rural Development) / or Directorate for Standards, Metrology and Quality (Ministry of Science and Technology) for multi-disciplinary certification organizations. Particularly for the GlobalGAP certification body, it must be recognized by the GlobalGAP standards management organization (European Retail Association) to meet the specific regulations for the certification body. For VietGAP certification for livestock, VietGAP for aquaculture: Concurrently meeting the following 02 conditions: Register for the respective certification activities at the Departments of Livestock Production / Directorate of Fisheries / or the Quality Management Department of Agro-Forestry and Fisheries (Ministry of Agriculture and Rural Development) or the General Department of Standards, Metrology and Quality (Ministry of Science and Technology). and technology) for multidisciplinary certification bodies.	Article 17, Article 18, Article 19 Decree 107/2016/ND-CP. Article 4. Circular 48/2012/TT-BNNPTNT.

		VietGAP livestock certification field: The certification body must register and be appointed by the Department of Livestock Production. VietGAP aquaculture certification field: The certification body must register and be appointed by the Directorate of Fisheries.	
III		MANAGING THE ACTIVITIES OF THE GAP. CERTIFICATION BODY	
		Article 23. Responsibilities and powers of the appointing agency 1. Responsibilities: a) Receive applications for registration, assessment, designation, re-appointment, expansion of the scope of appointment, supervision, and inspection of VietGAP certification organizations and experts according to the provisions of this Circular. b) Ensuring objectivity and fairness in the assessment and appointment of certification organisations. c) Confidentiality of information and data during inspection, assessment, and supervision of the certification body. d) Notify the Departments of Agriculture and Rural Development and publish on the Website or mass media the list of VietGAP certification organizations appointed, warned, suspended, or cancelled the appointment decision and a list of production facilities that are granted, re-issued, extended, warned, suspended, or cancelled VietGAP Certificates nationwide. dd) Organize training courses to issue certificates of VietGAP assessment profession, issue VietGAP assessment expert cards/IDs. e) Resolve complaints related to VietGAP certification in accordance with the law. 2. Powers: a) Issue, maintain, warn, or cancel the decision on appointment of a certification organization as prescribed. b) Request VietGAP certification organization to handle violations of production facilities. c) Inspect the production facilities granted the VietGAP Certificate and supervise the VietGAP assessment and certification activities of the certification organization. Article 24. Responsibilities and powers of the Department of Agriculture and Rural Development 1. Responsibilities: a) Inspect and inspect production facilities granted VietGAP Certificates and VietGAP assessment and certification activities by designated certification organizations according to their local competence. b) To settle complaints related to VietGAP certification in the locality in accordance with the law.	Article 23 and Article 24. Circular 48/2012/TT-BNNPTNT.

c) Coordinating with the designated agencies to supervise the activities of the certification body. d) Training VietGAP for organizations and individuals producing/preliminarily processing in the area. 2. Powers: a) Handle and notify the handling results to the appointing agency or request the designated agency to handle violations of the VietGAP certification organization in accordance with the law. b) Handle and notify the handling results to the certification organization or request the VietGAP certification organization to handle violations of the production facility.	
Article 18. Examination and inspection 1. Competent state management agencies conduct inspection and examination of designating agencies, production facilities and VietGAP certification organizations per the law on examination and inspection. 2. In case the designated agency commits a violation, the examination and inspection agency shall consider and handle it in accordance with the law. 3. If the VietGAP certification organization commits a violation, the inspection and inspection agency shall send the inspection and inspection report to the designating agency, requesting consideration and handling of the violation according to regulations. 4. In case the production facility that is granted the VietGAP Certificate commits a violation, the inspection agency shall send the inspection and inspection report to the Certificate-granting certification organization, requesting consideration and handling the violation of the regulations. Article 19. Handling of violations by production facilities Based on monitoring results or inspection and inspection results, the certification organization shall issue a decision to handle violations against the VietGAP Certificated producer in the following forms: 1. Warn in writing to the production facility when detecting that the production facility does not conform to the requirements of VietGAP. When warned, the production establishment must agree with the certification body on the time limit for remedying the nonconformity and take corrective action on time. After correcting the nonconformity, the production facility must report in writing to the certification body. 2. Suspend the validity of the VietGAP Certificate and stipulate the time limit for the producer to correct the nonconformity if the producer is warned but does not take corrective action on time. The time limit for remedying nonconformities shall not exceed 06 (six) months from the effective date of the suspension decision. 3. The VietGAP certificate is cancelled in the following cases: a) Failure to take action to correct the nonconformity on time after the suspension of VietGAP certification.	Article 18, Article 19, Article 20. Circular 48/2012/TT-BNNPTNT.

b) Request to postpone the supervision of the certification body 02 (two) times in a row without a valid reason.

c) Using the VietGAP logo, logo, or sign of the certification organization in contravention of the regulations of the competent authority or the content of the authorization document of the certification organization.

d) During the implementation of corrective actions from the effective date of the Decision to cancel the VietGAP Certificate, the production facility is not allowed to register for VietGAP certification. After fixing, if you want to certify VietGAP, you must re-register.

4. If a production facility's violation is detected and handled by an inspection or inspection agency and requires handling, the certification organization must notify the inspection and inspection agency immediately after signing the handling decision.

Article 20. Handling of violations by VietGAP certification organizations

Based on the results of supervision or inspection, the appointing agency shall issue a decision to handle violations against the VietGAP certification organization in the following forms:

1. Warn when the designated certification body has a non-conforming point that has not yet affected the certification result.

2. Suspend the effect of the appointment decision in case there is a technical nonconformity that can be remedied and has not yet caused severe consequences:

a) Corrective actions in the monitoring report are not fully implemented.

b) Failure to comply with the reporting regime as prescribed in Article 22 of this Circular.

c) During the time of taking corrective actions from the effective date of the decision to suspend the appointment decision, the certification body is not allowed to carry out VietGAP certification activities. After the remedial work is completed, the remedial report must be sent to the designated agency. Based on the remedial report, the appointing agency shall issue a decision to allow the certification organization to continue its certification activities; In case of necessity, the designating body may conduct re-inspection at the certification body.

3. The appointment decision is annulled in the following cases:

a) The certification organization fails to satisfy the conditions specified in Articles 5 and 6 of this Circular.

b) The certification organization is not honest and objective in its assessment and certification activities.

c) Within at least 01 (one) year from the date on which the Appointment Decision is annulled, the certification organization must not register for VietGAP certification activities. A certification body that wants to re-operate after the above time limit must carry out the procedures for registration and re-

		appointment assessment according to the provisions of Article 10 of this Circular and must have a commitment not to re-offend. Repeat offenders will be permanently banned. 4. If a certification organization's violation is detected and handled by an examination or inspection agency, the designating agency must notify the inspection and inspection agency immediately after signing the handling decision.	
IV		**MANAGEMENT ACTIVITIES OF CERTIFICATE ORGANIZATIONS VIETGAP GROWING, GLOBALGAP, CERTIFICATION ORGANIZATION OF FOOD SAFETY MANAGEMENT SYSTEM (HACCP) IN VIETNAM**	
		Article 26. Revocation of operation registration certificate of conformity assessment organizations Line ministries shall consider and decide to revoke operation registration certificates in case the conformity assessment organization violates one of the following regulations: 1. Repeated administrative violations of Clause 6, Article 8, Article 20 of the Law on Product and Goods Quality and the provisions of this Decree. 2. Failing to fulfil the responsibilities specified in Article 29 of this Decree for 2 consecutive years. 3. Failing to satisfy one of the corresponding conditions for conformity assessment organizations as prescribed in Articles 5, 9, 9, 13 and 17 of this Decree. 4. Forging or making false statements in documents in the application for issuance, re-issuance, or supplement of the Certificate; surrogacy of conformity assessment results. 5. Erase, correct, or falsify the contents of the granted registration certificate. 6. Failing to remedy violations at the request of inspection and examination agencies.	Article 26. Decree 107/2016/ND-CP.
		Article 28. Responsibilities of line ministries 1. Ministries managing branches and domains: a) Issue new, supplement, amend and re-issue the Certificate of registration of testing, inspection, assessment, and certification to the conformity assessment organization according to the principles specified in Article 4. of this Decree; b) Assume the prime responsibility for and coordinate with the Ministry of Science and Technology and relevant line ministries in inspecting and examining the registered conformity assessment organization according to the principles specified in Article 4. of this Decree; c) Publicly publish the list of registered conformity assessment organisations on the web portal of line ministries and information on the Ministry of Science and Technology within 15 days from the registration date for tracking. 2. Ministry of Science and Technology:	Article 28, Article 29. Decree 107/2016/ND-CP

	a) Issue new, supplement, amend and re-grant certificates of registration of testing, inspection, assessment, and certification activities to conformity assessment organizations according to the principles specified in Article 4 of this Decree, this regulation, and the accreditation body of the conformity assessment body. b) Guidelines for the training program framework for product certification auditors, management system auditors, and standards for training institutions; receive the announcement of eligibility to conduct training from the training institution for product certification assessors and management system auditors. c) Carry out inspection and examination: A multi-disciplinary general conformity assessment organization, the Ministry of Science and Technology shall carry out a registered accreditation organization, training institutions for product certification auditors and management system auditors. d) Cooperate with line ministries in inspecting and examining registered specialized conformity assessment organisations. dd) Publicly announce on the web portal of the Ministry of Science and Technology (General Department of Standards, Metrology and Quality) the list of multi-disciplinary general conformity assessment organizations and accreditation organizations that the Ministry of Science and Technology has approved. Register a list of institutions that train product certification auditors and management system auditors; e) Guiding the implementation of the standards cited in this Decree when amended, supplemented, or replaced. Article 29. Responsibilities of conformity assessment organizations and accreditation organizations 1. Conformity assessment organization: a) Annually or irregularly upon request, the conformity assessment organization shall report to the line or field line ministry the results of registered conformity assessment activities for each type of conformity assessment. organizational form according to Form No. 07, Form No. 08, and Form No. 09 in the Appendix issued together with this Decree; b) Notify the line ministry of any change affecting the registered operation capacity within 15 days from the date of the change:	
V	HANDLING OF ADMINISTRATIVE VIOLATIONS FOR GAP_HACCP CERTIFICATE ORGANIZATIONS IN VIETNAM	
	Article 21. Violations against regulations on conformity assessment activities 1. A fine of between VND 30,000,000 and 40,000,000 shall be imposed for one of the following acts: a) Carry out conformity assessment activities when the competent authority has not granted the operation registration as prescribed.	Article 21. Decree 119/2017/ND-CP

b) Carry out conformity assessment outside the registered domain.

c) Failing to make periodic or irregular reports at the request of a competent authority on the results of registered conformity assessment activities.

d) Failing to announce on the mass media about the grant, re-grant, expansion, narrowing of scope, or temporary suspension or revocation of the certificate of conformity and the right to use the standard conformity mark, the conformity mark, and regulation.

2. A fine ranging from VND 40,000,000 to VND 50,000,000 shall be imposed for one of the following acts:

a) Conduct conformity assessment in service of state management when the appointment has not yet been appointed or the appointment decision has expired.

b) Conduct conformity assessment in service of state management outside the designated field.

c) Failure to maintain organizational structure and registered capacity as required by relevant standards or regulations of competent authorities.

d) Failing to comply with the approved or registered conformity assessment processes and procedures as prescribed.

d) Failing to carry out periodic monitoring and evaluation of organizations and individuals requesting conformity assessment.

e) Using test results of testing organizations that have not been registered to operate as prescribed.

g) Appointing experts to conduct conformity assessments that do not satisfy the conditions as prescribed.

3. A fine ranging from VND 70,000,000 to VND 100,000,000 shall be imposed for one of the following acts:

a) Providing false conformity assessment results.

b) The assessment does not ensure independence and objectivity.

4. A fine of between VND 100,000,000 and 150,000,000 shall be imposed for one of the following acts:

a) Failing to conduct conformity assessment but granting conformity assessment results.

b) Carry out consulting activities for organizations and individuals applying for certification.

c) Failure to take remedial action at the request of a competent authority.

5. Additional sanctions:

a) Deprive the right to use the certificate of registration of conformity assessment activities for 3 to 6 months for violations specified at Points a and b, Clause 1, and Points c, dd, e and g, Clause 2., Clauses 3 and 4 of this Article.

b) Deprive the right to use the appointment decision for between 3 and 6 months for violations specified at Points a and b, Clause 2, and Clause 4 of this Article.

6. Remedial measures:

a) Force This. b) Forcible return of illegal profits from committing violations specified at Points A and b, Clause 1, Points a, b, c, d, e and g, Clause 2, Clause 3, and Points a., b, and c Clause 4 of this Article.	
38. To amend and supplement several points and clauses of Article 21 as follows: a) Add point c, point d Clause 3 Article 21 as follows: " c) Carry out conformity assessment activities when the certificate of registration of conformity assessment activities has expired; d) Carry out conformity assessment outside the registered field. "; b) Modify the opening paragraph of Clause 2 Article 21 as follows: " 2. A fine of between VND 50,000,000 and 100,000,000 shall be imposed for one of the following acts: " c) Amendment Point a Clause 2, Article 21 as follows: " a) Conduct conformity assessment in service of state management when the appointment decision has expired; "; d) Additional points d, Clause 4 Article 21 the following provisions: " d) Carrying out the conformity assessment activities when the operation registration has not been granted by the competent authority as prescribed; dd) Conduct conformity assessment in service of state management when not yet appointed; "; d) Modify the opening paragraph of Clause 3 Article 21 as follows: " 3. A fine ranging from VND 100,000,000 to VND 150,000,000 shall be imposed for one of the following acts: " e) Modify the opening paragraph of Clause 4 Article 21 as follows: " 4. A fine of between VND 150,000,000 and VND 300,000,000 shall be imposed for one of the following acts: " g) Amendment, supplement Clause 5 Article 21 as follows: " 5. Additional sanction: a) Deprivation of the right to use the certificate of registration of conformity assessment activities for 3 to 6 months for violations specified at Point b, Clause 1, and Points c, dd, e and g, Clause 2 of this Article. This; b) Deprivation of the right to use the certificate of registration of conformity assessment activities from 06 months to 09 months for violations specified in Clause 3 and Points a, b and c, Clause 4 of this Article;	Clause 38. Article 2. Decree 126/2021/ND-CP

| c) Deprivation of the right to use the decision to appoint a conformity assessment organization from 06 to 12 months for violations specified in Points b, Clause 2, Points a, b, Clause 3 and Points a, b, c Clause 4 of this Article;
d) Suspend conformity assessment from 01 to 03 months, for violations specified at Point a, Clause 1 of this Article. ";
h) Amendment Clause 6 Article 21 as follows:
" 6. Remedial measures:
a) Forcible withdrawal of the granted conformity assessment results for violations specified at Point a, Clause 1, Points a, b, c, d, e and g, Clause 2, and Clauses 3 and 4 of this Article. This;
b) Forcible return of illegal profits obtained from committing violations specified at Point b, Clause 1, Points a, b, c, d, e and g, Clause 2, and Clauses 3 and 4 of Article 2. This. ". | |

ANNEX C   SUMMARY TABLE FOR GAP-HACCP-ISO: DEFINITION OF TERMS

Annex D.   Summary Table for GAP-HACCP-ISO: Definition of terms

	Assessment of conformity (AoC) activity Field					Accreditation activity Field – *Only BoA perform*		
	VIETGAP for Livestock	VIETGAP for Fisheries	STAMEQ<MOST-MARD>AQUA Department/ Fisheries	VIETGAP for Veg & Crop	HACCP	GAP	HACCP	ISO22000
1. SCHEME	MARD>Livestock Department	MARD>AQUA Department/ Fisheries	STAMEQ<MOST-MARD>AQUA Department/ Fisheries	TAMEQ<MOST-MARD>Crop Production Departme	HACCP/ISO	International Accreditation Forum (IAF)	International Accreditation Forum (IAF)	International Accreditation Forum (IAF)
1.1 Field Range for scheme	Product	Product	Product	Product	Management system	Product	Management system	Management the food chain
1.2 Type definition of scheme	8 VIETGAHP practice guidelines for the large-scale farm, and 2 GAP practice guidelines for small-scale farm as households, these attachment issued together with the Decision No. 4653 /QĐ-BN N-CN dated November 10, 2015 of the Minister of Agriculture and Rural Development, and the Decision No. 2509/QD-BNN-CN dated June 22, 2016 of the Minister of Agriculture and Rural Development	1. Vietnam Good Aquaculture Practices (VietGAP) issued together with Decision No. 3824/QĐ-BN N-TCTS dated September 6, 2014 of the Minister of Agriculture and Rural Development 2. Guidelines on application of VietGAP to commercial farming of pangasius (*Pangasianodon hypophthalmus*) promulgated together with Decision No. 4669/QD-BN N-TCTS dated October 28, 2014 of the Minister of Agriculture and Rural Development 3. Guidance on application of VietGAP to commercial farming of white leg shrimp (*P.vannamei*), black tiger shrimp (*P.monodon*) promulgated together with Decision No. 4835/QD-BNN-TCTS dated November 24, 2015 of the Minister of Agriculture and Rural Development 4. Guidelines on application of VietGAP to tilapia (*Oreochromis sp*) commercial farming issued together with Decision No. 1233/QD-BNN-TCTS dated April 11, 2016 of the Minister of Agriculture and Rural Development	TCVN 13528-1:2022 (Good Aquaculture Practices (VietGAP) - Part 1: Pond aquaculture) (the decision takes effect on December 30, 2022), and has just been updated on Law Library website on 28/03/2022	TCVN 11892-1:2017 (Good agricultural practices (Vietgap) - Part 1: Crop production)	TCVN 5603 : 2008 (CAC/RCP 1-1969, REV.4-2003 : Code of practice - General principles of food hygiene) QCVN 02-02:2009/BNNPTNT (Fisheries Food Business Operators –HACCP Based Program for Quality and Safety Assurance)	ISO/IEC 17065	ISO/TS 22003, ISO/IEC 17021-1:2015	ISO/TS 22003, ISO/IEC 17021-1:2015
2. CERTIFIED BODY	STAMEQ<MOST/MARD (MARD-specialized field activity)>(Livestock Department (specialized livestock product)/NAFIQAD (multi-specialized product) + Livestock Department (appoval activity)	STAMEQ<MOST/MARD (MARD-specialized field activity)>(AQUA Department (specialized fish product)/NAFIQAD (multi-specialized product) + AQUA Department (appoval activity)	STAMEQ<MOST/MARD (MARD-specialized field activity)>(AQUA Department (specialized fish product)/NAFIQAD (multi-specialized product)	STAMEQ<MOST/MARD (MARD-specialized field activity)>(Crop Production Department (specialized crop product) / NAFIQAD (multi-specialized product)	MOST>STAMEQ	Bureau Of Accreditation (BoA)	Bureau Of Accreditation (BoA)	Bureau Of Accreditation (BoA)
2.1 Definition	Tổ chức đánh giá sự phù hợp được chỉ định (Approval activities of Authority State Agencies for Conformity Assessments Organisations)	Tổ chức đánh giá sự phù hợp được chỉ định (Approval activities of Authority State Agencies for Conformity Assessments Organisations)	Tổ chức đánh giá sự phù hợp (Conformity Assessments Organisations)	Tổ chức đánh giá sự phù hợp (Conformity Assessments Organisations)	Tổ chức đánh giá sự phù hợp (Conformity Assessments Organisations)	Certified body	Certified body	Certified body
2.2 Legal regulation	Decree No. 107/2016/ND-CP dated July 1, 2016 (Nghị định 107/2016/NĐ-CP); Decree No. 154/2018/ND-CP Dated November 09, 2018 (Nghị định 154/2018/NĐ-CP); Decree No. 74/2018/ND-CP dated May 15, 2018 (Nghị định 74/2018/NĐ-CP); Decision No. 3322/QD-BNN-KHCN dated 08/08/2017 of MARD (Quyết định số 3322/QD-BNN-KHCN ngày 08/08/2017 BNNPTNT); Circular No. 48/2012/TT-BNNPTNT dated September 26, 2012 of the Ministry of Agriculture and Rural Development (Thông tư 48/2012/TT-BNNPTNT)	Decree No. 107/2016/ND-CP dated July 1, 2016; Decree No. 154/2018/ND-CP Dated November 09, 2018; Decree No. 74/2018/ND-CP dated May 15, 2018; Decision No. 3322/QD-BNN-KHCN dated 08/08/2017 of MARD; Circular No. 48/2012/TT-BNNPTNT dated September 26, 2012 of the Ministry of Agriculture and Rural Development	Decree No. 107/2016/ND-CP dated July 1, 2016; Decree No. 154/2018/ND-CP Dated November 09, 2018; Decision No. 3322/QD-BNN-KHCN dated 08/08/2017 of MARD (NOTE: NEED THE FINAL STEP TO ISSUE THE AMENDMENT TO CIR 48 TO REMOVE THE APPROVED ACTIVITY INTO THE VOLUTERED ACTIVITY UNDER ND 107. THEN COLUMN TO THE LEFT WILL DISAPPEAR AND NOT BE VALID)	Decree No. 107/2016/ND-CP dated July 1, 2016; Decree No. 154/2018/ND-CP Dated November 09, 2018; Decision No. 3322/QD-BNN-KHCN dated 08/08/2017 of MARD; Circular No. 06/2018/TT-BNNPTNT dated June 21, 2018 of the Ministry of Agriculture and Rural Development amending Circular No. 48/2012/TT-BNNPTNT dated September 26, 2012 of the Ministry of Agriculture and Development (Thông tư 06/2018/TT-BNNPTNT sửa đổi Thông tư số 48/2012/TT-BNNPTNT)	Decree No. 107/2016/ND-CP dated July 1, 2016; Decree No. 154/2018/ND-CP Dated November 09, 2018	IAF audited to ISO 17065 and ISO 22003 audited internationally every 4 years.	IAF audited to ISO 17065 and ISO 22003 audited internationally every 4 years.	IAF audited to ISO 17065 and ISO 22003 audited internationally every 4 years.
2.3 Permission — Type of certified	Activity field License/Certificate + Approval Decision for organisation conducts the assessment of conformity activity serve the requirements of state management activities	Activity field License/Certificate + Approval Decision for organisation conducts the assessment of conformity activity serve the requirements of state management activities	Activity field Licenses/Certificates	Activity field Licenses/Certificates	Activity field Licenses/Certificates	Accredited body	Accredited body	Accredited body
2.4 Reporting duty	The frequency of reporting duty (1 per year and in case of incident)	The frequency of reporting duty (1 per year and in case of incident)	The frequency of reporting duty (1 per year and in case of incident)	The frequency of reporting duty (1 per year and in case of incident)	The frequency of reporting duty (1 per year and in case of incident)	Yearly	Yearly	Yearly
3. INSPECTION/AUDIT (handle administrative violations)	MARD — DARD	MARD — DARD	MOST-MARD	MOST-MARD	MOST	IAF	IAF	IAF
3.1 Legal regulation	Circular No. 48/2012/TT-BNNPTNT dated September 26, 2012 of the Ministry of Agriculture and Rural Development	Circular No. 48/2012/TT-BNNPTNT dated September 26, 2012 of the Ministry of Agriculture and Rural Development	Decree No. 107/2016/ND-CP dated July 1, 2016; Decree No. 154/2018/ND-CP Dated November 09, 2018 Decree No. 119/2017/ND-CP dated November 01, 2017; Decree No. 126/2021/ND-CP dated December 30, 2021	Decree No. 107/2016/ND-CP dated July 1, 2016; Decree No. 154/2018/ND-CP Dated November 09, 2018 Decree No. 119/2017/ND-CP dated November 01, 2017; Decree No. 126/2021/ND-CP dated December 30, 2021	Decree No. 107/2016/ND-CP dated July 1, 2016; Decree No. 154/2018/ND-CP Dated November 09, 2018 Decree No. 119/2017/ND-CP dated November 01, 2017; Decree No. 126/2021/ND-CP dated December 30, 2021	IAF audited to ISO 17065 and ISO 22003 audited internationally every 4 years	IAF audited to ISO 17065 and ISO 22003 audited internationally every 4 years	IAF audited to ISO 17065 and ISO 22003 audited internationally every 4 years
3.2 Objectives	Approval activities of Authority State Agencies for Conformity Assessments Organisations>Production Site/Produce Unit	Approval activities of Authority State Agencies for Conformity Assessments Organisations>Production Site/Produce Unit	Conformity Assessments Organisations	Conformity Assessments Organisations	Conformity Assessments Organisations	Accredited body	Accredited body	Accredited body

NOTE   The BoA also has to do the registration of operation field for the accreditation activity because the Accreditation field is one of the businesses that are on the list of the Regulated Conditions
-The registration operation field of the accreditation field has also been conducted under the guidance of Decree 107/2016/NĐ-CP

ANNEX D   LIST OF LEGAL DOCUMENTS RELATED TO CERTIFICATION ACTIVITY 1223.1

TT	Name of Document
	LAW/ORDINANCE
01	Law No. 68/2006/QH11: Law on Standards and Technical Regulations
02	Law No. 05/2007/QH12: Law on product and goods quality
03	Law No. 55/2010/QH12: Law on Food Safety
	DECREE
01	Decree No. 127/2007/ND-CP, dated August 1, 2007, of the Government, detailing the implementation of several articles of the Law on Standards and Technical Regulations
02	Decree No. 78/2018/ND-CP dated May 16, 2018, of the Government amending and supplementing various articles of Decree No. 127/2007/ND-CP dated August 1, 2007, detailing the implementation of various articles of the Law on Standards and Technical Regulations
03	Decree No. 132/2008/ND-CP dated December 31, 2008, of the Government detailing the implementation of various articles of the Law on product and goods quality.
04	Decree No. 74/2018/ND-CP dated May 15, 2018, of the Government amending and supplementing various articles of the Government's Decree No. 132/2008/ND-CP dated December 31, 2008, regulating expenses detailing the implementation of various articles of the Law on Product and Goods Quality.
05	Decree No. 13/2022/ND-CP dated January 21, 2022, of the Government amending and supplementing several articles of Decree No. 132/2008/ND-CP dated December 31, 2008, Decree No. 74/2018 /ND-CP dated May 15, 2018, of the Government detailing the implementation of several articles of the Law on product and goods quality and Decree No. 86/2012/ND-CP dated October 19, 2012, of the Government detailing and guiding the implementation of several articles of the Law on Measurement.
06	Decree No. 15/2018/ND-CP dated February 2, 2018, of the Government detailing the implementation of various articles of the Law on Food Safety
07	Decree No. 107/2016/ND-CP dated July 1, 2016, of the Government regulating conditions for business in conformity assessment services
08	Decree No. 154/2018/ND-CP dated November 9, 2018, of the Government amending, supplementing, and annulling various regulations on investment and business conditions in the field of state management of the Ministry of Science and Technology and various regulations on specialized inspection
09	Decree No. 119/2017/ND-CP dated November 1, 2017, of the Government on sanctioning of administrative violations in the field of standards, measurement and quality of products and goods
ten	Decree No. 126/2021/ND-CP dated December 30, 2021, of the Government amending and supplementing several articles of the decrees on sanctioning of administrative violations in the field of industrial property; standards, measurement and quality of products and goods; scientific and technological activities, technology transfer; atomic energy.

11	Decree No. 115/2018/ND-CP, dated September 4, 2018, of the Government sanctioning administrative violations on food safety
twelfth	Decree No. 124/2021/ND-CP dated December 28, 2021, of the Government amending and supplementing several articles of the Government's Decree No. 115/2018/ND-CP dated September 4, 2018, sanctioning violations of the Decree No. Administrative violations on food safety and Decree No. 117/2020/ND-CP dated September 28, 2020, of the Government on sanctioning administrative violations in the health sector.
	CIRCULARS
01	Circular No. 11/2021/TT-BKHCN, dated November 18, 2021, of the Ministry of Science and Technology, detailing the formulation and application of standards
02	Circular No. 48/2012/TT-BNNPTNT, dated September 26, 2012, of the Ministry of Agriculture and Rural Development stipulates the certification of aquatic products, crops and livestock produced and preliminarily processed in accordance with the Regulations of good agricultural practices.
03	Circular No. 06/2018/TT-BNNPTNT dated June 21, 2018, of the Ministry of Agriculture and Rural Development amending Circular No. 48/2012/TT-BNNPTNT dated September 26, 2012, of the Ministry of Agriculture and Development regulations on certification of aquatic products, crops and livestock produced and preliminarily processed in accordance with the Good Agricultural Practices Process.
	CERTIFICATE STANDARDS
01	Vietnamese Standard TCVN 11892-1:2017 Good Agricultural Practices in Vietnam (VietGAP) Part 1: Crop production
02	Vietnam Good Aquaculture Practices (VietGAP) issued together with Decision No. 3824/QD-BNN-TCTS dated September 6, 2014, by the Minister of Agriculture and Rural Development.
03	Guidelines for the application of VietGAP to commercial farming of pangasius (*Pangasianodon hypophthalmus*) harmonized together with Decision No. 4669/QD-BNN-TCTS dated October 28, 2014, of the Minister of Agriculture and Rural Development
04	Guidance on the application of VietGAP for commercial farming of white leg shrimp *(P.vannamei)* black tiger shrimp *(P.monodon)* harmonized together with Decision No. 4835/QD-BNN-TCTS dated November 24, 2015, of the Minister of Agriculture and Rural Development.
05	Guidance on the application of VietGAP to tilapia (Oreochromis *sp)* farming harmonized together with Decision No. 1233/QD-BNN-TCTS dated April 11, 2016, of the Minister of Agriculture and Rural Development
06	Good husbandry practice process for pig production in Vietnam (VietGA H P raising pigs) issued together with Decision No. 4653 /QD-BNN-CN dated November 10, 2015, of the Minister of Agriculture and Rural Development
07	Good husbandry practices for chicken production in Vietnam (VietGAHP raises chickens) issued together with Decision No. 4653/QD-BNN-CN dated November 10, 2015, of the Minister of Agriculture and Rural Development
08	The process of good husbandry practices for duck and swan farming in Vietnam (VietGA HPP raising ducks and swans) harmonized together with the Minister's Decision No.

	4653/QD-BNN-CN dated November 10, 2015, Ministry of Agriculture and Rural Development
09	practices for beef cattle production in Vietnam (VietGAHP for beef cattle production) harmonized together with Decision No. 4653/QD-BNN-CN dated November 10, 2015, of the Minister of Agriculture and Rural Development Rural development
10	The Process of Good Breeding Practices for Dairy Farming in Vietnam (VietGAHP for dairy cows) harmonized together with Decision No. 4653/QD-BNN-CN dated November 10, 2015, of the Minister of Agriculture and Rural Development. Rural development
11	The Process of Good Animal Husbandry Practices for Meat Goat Breeding in Vietnam (VietGAHP for Meat Goat Breeding) harmonized together with Decision No. 4653/QD-BNN-CN dated November 10, 2015, of the Minister of Agriculture and Rural Development Rural Development.
12	Good husbandry practices for dairy goats in Vietnam (VietGAHP raising dairy goats) issued together with Decision No. 4653/QD-BNN-CN dated November 10, 2015, of the Minister of Agriculture and Rural Development.
13	Good husbandry practices for honey beekeeping in Vietnam (VietGAHP honey beekeeping) issued *together with Decision No. 4653/QD-BNN-CN dated November 10, 2015, of the Minister of Agriculture and Rural Development*
14	The process of good husbandry practices for safe pig production in households (VietGA H P, household pigs) issued *together with Decision No. 2509/QD-BNN-CN dated June 22, 2016, of the Minister of Agriculture and Rural Development*
15	Good husbandry practices for chicken farming safety in households (VietGA HP Farmhouse Chicken) issued together *with Decision No. 2509/QD-BNN-CN dated June 22, 2016, of the Minister of Agriculture and Rural Development.*
16	TCVN 13528-1:2022 *Good Aquaculture Practices (VietGAP) - Part 1: Pond aquaculture*
17	TCVN 5603: 2008 CAC/RCP 1-1969, REV.4-2003 *Code of practice - General principles of food hygiene*
18	QCVN 02-02:2009 /BNNPTNT *Fisheries Food Business Operators –HACCP Based Program for Quality and Safety Assurance*

ANNEX E   DESCRIPTION FOR ENGLISH USER OF DEFINITIONS IN ANNEX C

Description for English User for the Definitions in Annex C

Tên gọi của tổ chức thực hiện việc chứng nhận/ *Vietnamese expression of organisation conduct the certification*		Định nghĩa theo từng cấu phần hợp thành từ ghép/ *Definition of each component that makes up a compound word for the description*	Các loại "Chuẩn mực" được phân biệt để sử dụng trong đánh giá chứng nhận/ *Different types of "name of standard" for use in certification field*	Đối tượng cần phân biệt trong chứng nhận/ *Objective to be distinguished in certification*	Đặc điểm so sánh/ *Notes on characteristics to distinguish type of certification*
Tên/ Name	Định nghĩa / Definition				
Tổ chức đánh giá sự phù hợp (Conformity Assessments Organisation / CB)	là tổ chức tiến hành hoạt động thử nghiệm, giám định, kiểm định, chứng nhận sự phù hợp (conformity) của sản phẩm, hàng hóa, quá trình sản xuất, cung ứng dịch vụ phù hợp với tiêu chuẩn công bố áp dụng, quy chuẩn kỹ thuật tương ứng	Đánh giá sự phù hợp (assessment of conformity) là việc xác định đối tượng của hoạt động trong lĩnh vực tiêu chuẩn và đối tượng của hoạt động trong lĩnh vực quy chuẩn kỹ thuật phù hợp (conformity) với đặc tính kỹ thuật và yêu cầu quản lý quy định trong tiêu chuẩn tương ứng và quy chuẩn kỹ thuật tương ứng. Đánh giá sự phù hợp bao gồm hoạt động thử nghiệm, hiệu chuẩn, giám định, chứng nhận hợp chuẩn, chứng nhận hợp quy, công bố hợp chuẩn, công bố hợp quy, công nhận năng lực của phòng thử nghiệm, phòng hiệu chuẩn, tổ chức chứng nhận sự phù hợp, tổ chức giám định.	Tiêu chuẩn (Standard) là quy định về đặc tính kỹ thuật và yêu cầu quản lý dùng làm chuẩn để phân loại, đánh giá sản phẩm, hàng hoá, dịch vụ, quá trình, môi trường và các đối tượng khác trong hoạt động kinh tế - xã hội nhằm nâng cao chất lượng và hiệu quả của các đối tượng này. Tiêu chuẩn do một tổ chức công bố dưới dạng văn bản để tự nguyện áp dụng.	Chứng nhận hợp chuẩn (Certify for standard)	1. Chứng nhận hợp chuẩn được thực hiện theo thỏa thuận của tổ chức, cá nhân có nhu cầu chứng nhận với tổ chức chứng nhận sự phù hợp quy định tại Điều 50 của Luật này. 2. Tiêu chuẩn dùng để chứng nhận hợp chuẩn là tiêu chuẩn quốc gia (TCVN), tiêu chuẩn quốc tế (international standard), tiêu chuẩn khu vực (arean standard-ex:Asian) hoặc tiêu chuẩn nước ngoài (foreigner standard) đáp ứng yêu cầu quy định tại Điều 42 của Luật này.
Tổ chức đánh giá sự phù hợp được chỉ định (approval activities of Authority State Agencies)	là tổ chức đáp ứng các điều kiện quy định tại khoản 5 Điều 25 của Luật này và được cơ quan quản lý nhà nước có thẩm quyền xem xét, quyết định công bố danh sách để tổ chức, cá nhân sản xuất, kinh doanh lựa chọn sử dụng dịch vụ đánh giá sự phù hợp phục vụ yêu cầu quản lý nhà nước (serve the requirements of state management activities).	Chứng nhận (Certify) là việc đánh giá và xác nhận sự phù hợp của sản phẩm, quá trình sản xuất, cung ứng dịch vụ với tiêu chuẩn công bố áp dụng (gọi là chứng nhận hợp chuẩn) hoặc với quy chuẩn kỹ thuật (gọi là chứng nhận hợp quy).	Quy chuẩn kỹ thuật (Technical regulations) là quy định về mức giới hạn của đặc tính kỹ thuật và yêu cầu quản lý mà sản phẩm, hàng hoá, dịch vụ, quá trình, môi trường và các đối tượng khác trong hoạt động kinh tế - xã hội phải tuân thủ để bảo đảm an toàn, vệ sinh, sức khoẻ con người; bảo vệ động vật, thực vật, môi trường; bảo vệ lợi ích và an ninh quốc gia, quyền lợi của người tiêu dùng và các yêu cầu thiết yếu khác. Quy chuẩn kỹ thuật do cơ quan nhà nước có thẩm quyền ban hành dưới dạng văn bản để bắt buộc áp dụng (Mandatory).	Chứng nhận hợp quy (Certify for regulation)	1. Chứng nhận hợp quy được thực hiện bắt buộc đối với sản phẩm, hàng hoá, dịch vụ, quá trình, môi trường thuộc đối tượng quy định trong các quy chuẩn kỹ thuật tương ứng. 2. Quy chuẩn kỹ thuật (technical regulations) dùng để chứng nhận hợp quy là quy chuẩn kỹ thuật quốc gia (QCVN), quy chuẩn kỹ thuật địa phương (QCĐP) đáp ứng yêu cầu quy định tại Điều 42 của Luật này.

ANNEX F   SOCIO-ECONOMIC CONSTRAINTS FOR SMALLHOLDER FARMERS TO IMPLEMENT CERTIFICATION SCHEMES.

Formulating a National Food Safety Standardization Strategy is essential in the context of international integration to ensure domestic food safety and support international trade. Expressly, standardisation activities must innovate, create new paths to better serve the country's socio-economic development plan until 2030, as laid out by the government, and simultaneously address several problems such as the COVID-19 pandemic and resource depletion.

Vietnam has engaged in 17 Free Trade Agreements (FTAs), of which fifteen have been implemented. Two other agreements have not concluded discussions, have not been signed, and have not been implemented. Despite this, Vietnam's economy has an international quotient for open trade of over two hundred per cent. Vietnams Participation in FTAs confers numerous benefits in market expansion, international trade, and the export of commodities.

Nevertheless, Vietnamese businesses also encounter other obstacles to comply with food safety standards. The use of international standards (ISO, IEC, etc.) to reduce technical barriers to international trade is promoted by the World Trade Organization (WTO) and may be a prerequisite for a country's agri-food products to enter the global market.

To support their competitiveness, innovation, and health and safety, as well as to strengthen global trade, establish development directions, and participate in developing international standards, countries must establish a strategic vision for standards development that are internationally recognized. Vietnam needs to adopt a national plan for food safety certification aligned with international best practice and standards.

The Government has developed plans and strategies for socio-economic development in 2021 – 2025 and orientation to 2030. However, there are still many problems related to standardization activities nationally. Vietnam's standard-building activities have not been planned and implemented strategically or properly. Standardisation activities have not helped promote socio-economic development nationally as most standard development is based on immediate needs and not planned with a long-term vision in mind.

The gradual increase of certification requirements in Vietnam, puts pressure on a system that is not well adjusted to the market requirements and trends.

The simple cost of the certification process is prohibitive to some, if not all, of the small-holder farmers in Vietnam. Only when they participate in Cooperatives and are larger-scale farmers can this associated cost be absorbed into the business's costs.

To better understand some of these impacts, we should also look at the availability and security of the food people in Vietnam are exposed to.
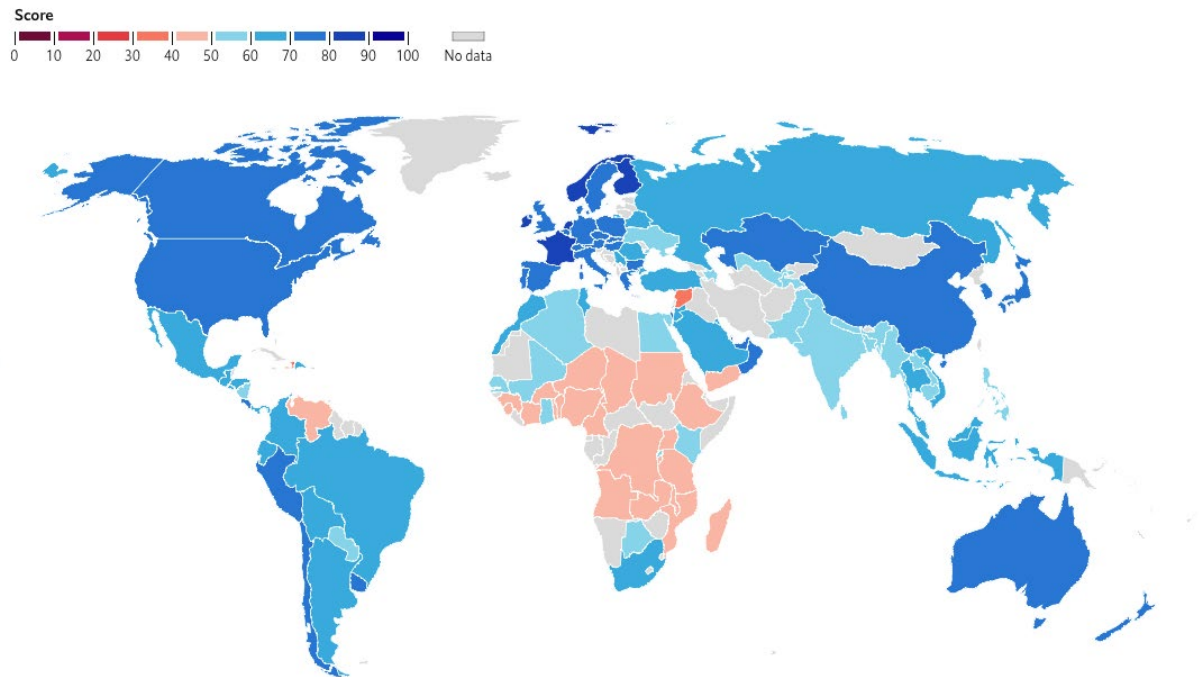
Global Food Security Index

Figure 20: World Map of Global Food Security Index

Figure 21: Food Security Environment[64] The diagram below shows the country's performance in 2022 (latest available data). Scores are normalized 0-100, where 100=best conditions.

Strengths and opportunities for action

Vietnam's strengths lie in enabling consumer-side food security, as reflected in strong food safety-net programmes, and stable average food costs. High protein quality also highlights the presence of safe and high-quality food present in the country. However, further efforts, such as diversified financial services and infrastructure, are required to ensure stronger production and supply by improving access to agricultural inputs. A countrywide commitment to adapt to growing risks from climate change is key to further food security.

Strengths

1.5) Food safety-net programmes: Vietnam scores a full 100 points in this indicator, having improved its position over the past 11 years. The presence of food safety-net programmes foreground strong mechanisms to make food more affordable for the general population.

3.4) Protein quality: Vietnam ranks 39th in this indicator and its score has improved in the past year. Improvement in this indicator suggests improvement in the overall quality of diet in the country.

1.1) Change in average food costs: Vietnam ranks 24th in the index in this indicator. The country had a high level of volatility in 2012 and 2013, but there has been significant improvement, particularly in the past year, revealing strong priorities in this area.

Areas for improvement

4.5) Political commitment to adaptation: Vietnam ranks 91st in this indicator, and its scores have decreased over the past three years. Prioritising commitment and setting government priorities is required to alleviate risks and manage sustainability and adaptation concerns.

2.6) Supply-chain infrastructure: Vietnam ranks 65th in the index for this indicator, the score for which has dropped in the past year. Improving existing infrastructure is essential to enhancing the availability of food.

2.1) Access to agricultural inputs: Vietnam ranks 84th in the index. Scores have varied over the years but there has been a notable decrease in the past two years. There is a lack of access to diversified financial products, low producer prices and a lack of focus on female farmers.

Figure 22: Vietnam Strengths and Opportunities for Action. (GFSI Country Report Vietnam 2022)

In the context of Vietnam

With this data from ITC in mind, it is essential to consider the impact that Certification may have on a person's decision to buy or not buy foodstuffs in Vietnam.

- The certification must be trustworthy.
- The certification must mean something and add value to the goods.
- The certification must be monitored and have good governance from the competent authority.
- The certification must be traceable and checks for validity must be easily accessible.

Unfortunately, some of these above criteria are not generally met when discussing certification in Vietnam. The mechanisms are in place to achieve these requirements, but the general implementation falters in its execution. Increased social media and mass media presence have dramatically facilitated the dissemination of information regarding food-borne disease outbreaks, accusations of fraud, and poor practices. This has a detrimental impact on firms and schemes where bad practices have been demonstrated. Still, it negatively impacts the scheme or sector and affects legitimate businesses. Consumers are concerned with food safety risks; therefore, demand for such products is also lost. Once producers lose confidence in a product, they are unlikely to spend money on certification because they do not perceive a benefit due to a lack of sales programming and long-term sustainability.

- A general change in mindset with the growers needs to be undertaken to enable this area of thought and put credibility back into the system.

- The GAP system should be "bettering the farmers' knowledge of growing practices and helping the business become more efficient and sustainable "rather than "more money for the product as they have certification."
- Better control and governance of the certification system and certifying bodies.
- A central database with transparent access to the details and validity of the certification, its origin, and producers.

Consequently, the food safety certification program in Vietnam has not achieved the anticipate level of adoption with less than five percent of agricultural crops being produced under a nationally recognized certification scheme. The absence of international standard harmonization is also a contributing factor.
As stated in section 5.1.1, only sixty per cent of all TCVNs produced in the country meet international criteria. To improve the efficiency of a national standard and scheme, national schemes must be aligned with and harmonised to international standards as soon as feasible but to the unique Vietnam context.

Smallholder Constraints and Route to Market Engagement

To start to engage with some of these smallholders, a more consistent approach and support for the route to market should be available to facilitate better, more sustainable returns.
Retailers must organise their commercial strategies to enable better programming of products with the producers, including communication with the public about how and why the work is being done like this. There is a need for better control and market development to ensure that the socioeconomic impact on the smallholder is bettered. [65],[66],[67],[68]

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> Compared to the 2008 version, TCVN 5603: 2023 has the following noticeable changes:
> Regarding the standard structure, TCVN 5603: 2023 is rearranged including two chapters:
> Chapter 1 Good hygiene practices (GHP)
> Chapter 2 Hazard analysis system, critical control points (HACCP), with detailed instructions.
> In terms of content, TCVN 5603: 2023 has been supplemented with several contents such as regulations on the commitment of business leaders in the application of HACCP and regulations on continuous improvement, making this standard closer to ISO management system standards.
> TCVN 5603: 2023 also requires production facilities to apply standards to be more substantive and become a "food safety culture", reflected in raising food hygiene awareness for all employees, improving training programs for officials and employees on food hygiene and safety.
> In addition to physical, chemical, and biological hazards, TCVN 5603:2023 also adds mandatory allergen control. TCVN 5603:2023 also adds requirements on product traceability and emphasizes guiding consumers on applying appropriate food hygiene measures such as proper hand washing, proper storage, and cooking, and avoiding cross-contamination.

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