

202300706 Response to Feedback stakeholders on Draft Food Law version 4 May 2023

Date	Article Draft Food Law version 4 May 2023	Comment	NIVS Task Team Response
06/2023	-	<p>A note in this. The law is well intentioned. My first reaction to the law is that it seems to legally apply to both locally produced and imported food products. However, the implementing provisions seem to focus mainly on locally produced products. It seems as if locally produced products are subject to approval by the NIVS.</p> <p>It does not appear from the law, or at least not adequately, that all imported food products are also subject to an approval statement/certificate issued by NIVS or other internationally recognized institute.</p>	<p>To ensure food safety, both imported products and locally produced products must comply with regulations. Exported products must comply with the requirements of the country of destination.</p> <p>Among others, the following articles of the draft food law specifically speak about imports</p> <ul style="list-style-type: none"> - Article 2:1 and 2:2 specifically talks about the import and sale of food products. The detailed regulations will come in the implementing regulations, as stated in Article 2: 7 - Article 3, all food businesses must register and comply with the requirements and procedures for registration and approval. As per Section 1f of the draft Food Act, a Food Business is: an enterprise or part of an enterprise, whether public or private, which operates, whether for profit or not, at any stage of the production, processing and distribution of food. This therefore includes an importer. - The NIVS will develop requirements for food business operators to operate as approved food businesses, including the development of food safety assurance programmes, such as Good Agricultural Practices (GAP), Good Hygiene Practices (GHP) or Good Manufacturing Practices (GMP), HACCP principles-based control procedures, Preventive control practices, or the establishment of criteria for the development of such programmes, and traceability requirements, see explanatory memorandum <p>As for the export certificate, the following:</p> <ul style="list-style-type: none"> - The requirements for an export certificate are determined by the country to which it is exported. - If the importing country does not require an export certificate then that is the reason for granting a waiver. - If the importing country does not require an export certificate for certain food and feed products then that is the reason for granting a waiver.

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		<p>In case of exports, an export certificate is also required. It is not clear how such verification takes place and whether this is a one-off or an endurance certificate. This may have an impact on export logistics processes involving delays and extra money.</p> <p>In my opinion, this is a law in which NIVS does not provide adequate local protection against non-compliant imports, nor is it an export incentive law.</p>	<p>The proposed law is inspired from modernized legislative provisions adopted by other countries, where the oversight on food to be consumed locally does not discriminate between locally produced and imported products. What matters is the protection of the consumers from all sources of potentially non-compliant and possibly hazardous food.</p>
06/2023	-	<p>To avoid the situation of forming one's own definition for certain terms and this creating a grey area later on in enforcement, it is best to define them clearly in Section 1 of the Act. For instance, there are some terms in the law that are subject to interpretation (and also do not appear in the law of NIVS), namely:</p>	
06/2023	<p>2:6 Advertising The labelling, advertising, packaging, handling and processing of/for a foodstuff in a manner that may be considered inaccurate or misleading or that may create a false impression as to its nature, value, quantity, composition, merit or safety or that contravenes</p>	<p>Define all what is meant by advertising. Is it only advertising on the packaging or at the sales address or all type of advertising either through radio/TVs/Billboards/ online etc is done about the product/ foodstuff.</p>	<p>This is a good point, and we can offer a definition for Advertising as follows:</p> <p>Advertising: making statements or claims about a food product through any vehicle, including but not limited to statements on labels, written and published information on billboards, placards, newspapers, magazines, audio-visual messages and /or social media available in Suriname, for the purposes of promoting the food product.</p>

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	regulations to be developed by the NIVS in this regard is prohibited.		
06/2023	<p>2:6 Food handling/ preparation/ processing The labelling, advertising, packaging, handling and processing of/for a foodstuff in a manner that may be considered inaccurate or misleading or that may create a false impression as to its nature, value, quantity, composition, merit or safety or that contravenes regulations to be developed by the NIVS in this regard is prohibited.</p>	<p>Proposed definition of handling and processing also to be included in the law.</p> <p>Proposed definitions: handling: the processing of food and drink products after their preparation and before their packaging, with which operations the nature of the product concerned is not changed. Source: Warenwetbesluit Bereiding en behandeling van levensmiddelen - Nederland</p> <p>processing: operation which substantially alters the original product, including by heating, smoking, salting, maturing, drying, marinating, extracting or extruding, or a combination of such treatments. Source: Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs.</p>	<p>Act NIVS (S.B. 2021 no. 19) has defined the term operations in section 1q:</p> <ul style="list-style-type: none"> - Producing: capturing or harvesting, manufacturing, preparing or treating, processing, conditioning, packing, labelling and storing food. - Trading: obtaining, stocking or displaying with a view to offering for sale, selling, delivering, transporting, handing over whether for consideration or not, bartering on any scale or any other manner of marketing foodstuffs, except in the cases provided for in or by this Act. - Import: the legal bringing into the territory of the Republic of Suriname of foodstuffs originating from another country. - Exporting: the legal delivery of foodstuffs to another country from the Republic of Suriname. <p>We will add:</p> <ul style="list-style-type: none"> - Processing: Any operation that changes the nature of the food from its primitive state resulting from primary production
06/2023	<p>2:1d adulterated It is prohibited to produce, import and or sell a foodstuff, which violates the rules and regulations established by the NIVS, if it: a. is contaminated with substances, which are harmful to consumer health; b. deemed unfit for consumption;</p>	Clearly define what constitutes adulteration of food.	Adulterate: To alter the food from its known state, resulting in an inferior condition

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	<p>c. has been handled under unhygienic conditions; d. has been adulterated; e. has been treated with additives, pesticides and veterinary drugs; f. has been enriched with nutrients; g. is considered new; h. contains ingredients subject to the protection of international regulations.</p>		
06/2023	<p>2:2 Feed It is prohibited to import and or sell feed in violation of the rules and regulations adopted by the NIVS and /or because they are intended for food-producing animals and under the feeding conditions applied would result in unsafe or contaminated food or food deemed harmful to human health.</p>	<p>In a legal or scientific context, it is sometimes necessary to eliminate any doubt about the meaning of the conjunction 'or'. In such cases, by using and/or, you can make explicit that the meaning 'and' can indeed apply.</p> <p>Clearly define what is meant by unsafe and/or contaminants. What contaminants and from what level of contamination is a food considered unsafe.</p>	<p>We accept your recommendation to include “and/ or”. We removed the word unsafe.</p> <p>Article 2.2. creates general provisions on the safety of feed, which will be further developed in regulations</p> <p>2:2 Feed It is prohibited to import and or sell feed in violation of the rules and regulations adopted by the NIVS and /or because they are intended for food-producing animals and under the feeding conditions applied would result in unsafe and/or contaminated food and/or food deemed harmful to human health.</p>
06/2023	-	<p>Although I don't see it explicitly included in the draft law, I notice in the document "POLICIES FOR THE DEVELOPMENT OF A MODERNISED FOOD LAW FOR THE REPUBLIC OF SURINAME" that under Section sixteen: Regulatory powers under the Food Act, it states the following: "Specific regulatory powers for food labelling and composition. The Act should create regulatory powers for the NIVS to develop rules for the food labelling to support the protection of the health of</p>	<p>Section 6:3 of Act NIVS (S.B. 2021 no. 19) states: In carrying out these tasks, in addition to the Codex Alimentarius standards, the national standards in the field of food products, as established by the Suriname Standards Bureau (SSB), will serve as guidance.</p> <p>The work done by SSB is very much appreciated and will be used by NIVS as a reference. The issue of possible duplication of mandate was already addressed by Section 28: 1 of Act NIVS (S.B. 2021 no. 19), all agencies that have powers relating to the oversight of food products will transfer them to the NIVS.</p>

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		<p>consumers (e.g. food allergen or nutrition labelling rules) and fairness in the food trade (e.g. quality rules related to production conditions such as organic food or local food). These rules should be enforceable under the law."</p> <p>I would like to mention here that the SSB had already initiated the development of a National Standard for Labelling of Pre-packaged Foods several years ago (even before the promulgation of the NIVS Act, since 2017). This initiative resulted from the "Health in All Policies (HiAP) project pulled by the Ministry of Health in collaboration with PAHO.</p> <p>From 2018, the Regional Standard "Labelling of Prepackaged foods" was revised bringing it in line with the recent CODEX Standard for Labelling of Prepackaged Foods. Suriname (SSB) is the secretariat of this committee within the CROSQ. While we are currently still in the process of finalising the regional standard (voting round), we have already taken the adjustments at the regional level and also incorporated them into our National Standard with the various stakeholders and experts in Suriname. This National Standard has already been finalised in April 2023. This also includes aspects such as deception and allergens. In addition, Suriname also participates in the Regional Commission that studies the development of the standard for Nutritional labelling. This standard will also be brought into</p>	

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		<p>line with the CODEX standards as much as possible, with minor adjustments for the region. We also have the Technical Regulations for the Labelling of Pre-packaged Goods (including food products).</p> <p>Considering the fact that the SSB has already done a lot of work in the field of labelling of pre-packaged foodstuffs, already has a label control service up and running and given that both the SSB and the NIVS have the same goal in mind, to stimulate and guarantee food safety in Suriname (both local and imported), but also taking into account aspects related to Technical Barriers for Trade (TBT), I think it is best that we enter into a cooperation in order to not only support but also strengthen each other, whereby time can also be gained. The National Guidelines for the Labelling of Prepacked Foods (which are largely in line with CODEX) are already in place; if the NIVS recognises these guidelines and enters into cooperation with the SSB, we can also, for example, elevate them as soon as possible (bearing in mind consultations with stakeholders) to a technical regulation and start implementation.</p> <p>The SSB is open to cooperation in order to contribute to the whole.</p>	
06/2023	-	<p>POLICIES FOR THE DEVELOPMENT OF A MODERNISED FOOD LAW FOR THE REPUBLIC OF SURINAME</p> <p>I think it is impossible to describe a legislation of 11 pages and the policies in 14 pages the complete legislation. I am therefore curious if</p>	<p>This draft food law is a Framework Law. The detailed rules will be provided in the implementing regulations, as indicated, for example, in Article 2: 7.</p>

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		<p>there are underlying documents with the explanations and detailed regulations of the elements you have named. Because now there are many different interpretation possibilities with which one can go either way which can then cause unintended discussions.</p>	
06/2023	-	<p>A great pity and, in my view, a missed opportunity as to why European legislation was not also looked at. There are many Surinamese companies that export to Europe, especially to the Netherlands.</p>	<p>The principles of the proposed Law follow the same as those adopted by EU food law. It noteworthy however that the EU law dates back to close to 20 years – and is being considered for further modernization.</p> <p>The proposed new food law by NIVS has considered this fact and while being aligned with the same principles as the EU law, but adopted a modernized approach, covered by countries which have recently changed their food legislation such as Canada, Singapore etc... It is also important to note, that we have drafted the law as a framework text – with insistence on principles, while details of execution will be subject to regulatory texts that are more easily amenable to updates, while following due process (of inclusivity and transparency), as per the third article of the NIVS Act (S.B. 2021 no. 19), when such updates are to be made.</p>
06/2023	-	<p>Labelling: law labels in which all labelling requirements are specified also for the country after which the product is exported.</p>	
06/2023	-	<p>Product recalls. (preventive measures and traceability requirements.) It is stated here that preventive measures must be taken, but it is a legal requirement that there must be full traceability from the supplier to the buyer of all raw materials used, packaging, etc. This must be tested at least once a year.</p>	<p>Indeed, we will take this into account when drafting implementing regulations. This is, in fact, a Framework Law.</p>
06/2023	-	<p>Vehicle/ Means of transporting or moving food: I actually miss the requirements of the transport temperature. Especially for day fresh products</p>	<p>We will indeed take this into account when drafting implementing regulations. This is, in fact, a Framework Law.</p>

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		like meat, chicken, ice cream and ready-to-eat vegetables etc. but also of frozen products	
06/2023	-	Food packaging or packing: What requirements are appointed here . One should receive a declaration of food grade packaging and a DOC (declaration of complinace) stating the migration tests. This is important to know that the packaging is suitable for the product in question to be packaged.	We will indeed take this into account when drafting implementing regulations. This is, in fact, a Framework Law.
06/2023	-	Food handling or preparation/ Processing: What are the requirements. Somewhere in the document something is mentioned to PRP (Pre Requite Programme) If that becomes a requirement then you are indeed covering this.	Indeed as indicated in the explanatory memorandum of Act NIVS (S.B. 2021 no. 19) section 5 but also the explanatory memorandum section 3 of the draft Food Act, programmes will be developed to ensure food safety, such as Good Agricultural Practices (GAP), Good Hygiene Practices (GHP) or Good Manufacturing Practices (GMP), HACCP principles-based control procedures or the establishment of criteria for the development of such programmes, and traceability requirements.
06/2023	-	Feed: Something is mentioned once about animal feed with which one has to comply. This is quite complex. If you want this to be complied with, you will also have to describe the conditions. Because I think you mean the farm animals that will be consumed after slaughter.	<p>In accordance with Section 5:2c of the NIVS Act (S.B. 2021 no. 19), the NIVS is charged with: Monitoring veterinary substances used in feed intended for animals, which will be used for human consumption.</p> <p>In accordance with Article 2:7, further rules and guidelines will be drawn up by the NIVS And article 2.2. of this draft food law creates general provisions on the safety of feed, which will be further developed in regulations</p>
06/2023	-	<p>Competent official. I wonder who will have to pay for this control.</p> <p>What will be the role of the BOG or VKI?</p>	<p>Any activity of public interest will be paid through NIVS resources. When activities create a service to industry, costs are recovered.</p> <p>The tasks and powers that the BOG and VKI have regarding the supervision of food safety and quality will be transferred to the NIVS in accordance with Section 28: 1 of Act NIVS (S.B. 2021 no. 19).</p>

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06/2023	-	Contamination/falsification and Food fraud; You could put this under a number.	Contamination can be non-deliberate and falsification is deliberate, therefore the distinction.
06/2023	-	Review and approval of export consignments: This section of the Act empowers the NIVS to issue export certificates at the request of food business operators or a foreign entity, government or organisation. Nice that you want to start doing this. But what is the recognised value of this. Possibly only within Suriname for export not. Many buyers, retailers etc demand international (ISO food) certification. Think of a GFSI (Global Food Safety Initiative) recognised certificate. The Global Food Safety Initiative(GFSI) originated from the need of a number of large international retailers to guarantee food safety worldwide. GFSI has now grown into a globally recognised initiative, representing major retailers and producers.	NIVS will also recognize certifications issued by reputable third parties, in accordance with acceptable food safety and quality schemes, including GFSI-benchmarked schemes.
06/2023	-	Contact point for the international network of food safety agencies: INFOSAN: You refer to INFOSAN's network but do they also cover all questions. Why is there also no reference to the international ISO standards and as indicated earlier the GFSI	<p>The International Food Safety Authorities Network (INFOSAN) is a global voluntary network of national authorities with a role in food safety, coordinated by a joint FAO/WHO Secretariat. National authorities of almost all of FAO and WHO Member States are part of the network. FAO and WHO have complementary roles in the management of INFOSAN.</p> <p>INFOSAN, by linking relevant authorities globally, is an important communication tool for exchanging information on food safety incidents and emergencies related to internationally traded foods, facilitating rapid access to relevant information.</p> <p>The bodies you are mentioning, including ISO are private standards developers / owners.</p>

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06/2023	-	Enable development of food labelling rules to support consumer health protection (e.g. food allergen or nutrition labelling rules): Allergens are named here for the first time. This is quite a requirement within food producing companies. What do you expect from storage, production etc, where allergens are also present within the company there is no mention of this.	We will take this into consideration when drafting implementing regulations. After all, this is a Framework Act.
06/2023	-	These regulations should be enforceable under the law. But is there an underlying document for this where this is mentioned. Or is only the labelling meant here.	Implementing regulations will be developed and will have the same force of law as the Act.
06/2023	-	Any third-party certifiers: What are your requirements for this. If a company has a GFSI accepted certificate (FSCC, BRC) which is reviewed annually on site. Do they then get certain exemptions. Think less visits from the inspector, not having to hold an export declaration issued by the inspector.	NIVS will develop such requirements in accordance with the recently issued Codex Guidance on Voluntary Third Party Assurance Schemes (vTPA).
06/2023	-	Investigating or testing, or taking samples of a foodstuff or its ingredients: At present, it is not yet possible to have all the required analyses carried out in Suriname. Or that there is no proper equipment, or raw materials to be able to analyse the product or that there is insufficient knowledge available. How are you going to monitor this then?	As part of NIVS commitment to adopt best practices in food regulatory practices, the NIVS has developed a strategic plan including the budget that will guide its food regulatory oversight, planning and operationalization of its food control programme. This includes prerequisites such as having a well-equipped laboratory. Recently, the NIVS received about USD 1 million worth of laboratory equipment and tools and additional training for conducting analysis will start soon
06/2023	-	There is also brief mention of the company's Culture. Every food producing company should have a Food Safety Culture plan. This is (European) legislation and also a requirement of ISO 22000 and FSCC certification.	Implementing regulations will be developed. After all, this is a Framework Act
06/2023	-	Here are some more recommendations	

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06/2023	-	Building requirements and maintenance of the food and feed company	We will indeed take this into consideration when developing implementing regulations. After all, this is a Framework Law.
06/2023	-	Maintenance of cold stores and freezers. Including a minimum annual (spot) inspection. This also applies to transport vehicles with evaporators.	
06/2023	-	Minimum temperature requirements for cold stores and freezers.	
06/2023	-	Verification of produced foodstuffs by means of shelf life (challenge) tests	
06/2023	-	Data labelling of raw materials received. Partially produced and final product to check shelf life	
06/2023	-	Requirements of temperature of produced products both cold and hot prepared	
06/2023	-	Calibration of weighing and measuring equipment: How often is the requirement that these are calibrated. I don't read anything about this especially when filling the containers, there should be a proper weight check here. But also at various temperatures. Think, for instance, of pasteurisation temperature.	
06/2023	-	Every company should have an HACCP plan including the monitoring of any identified risks. This can be done by monitoring the Critical Control Points (CCPs), General Control Measure (ABM) or through the Basic Conditions Programme (PRP).	
06/2023	-	I hope this helps you and look forward to your reply. If the new legislation is official, I would like to receive it by e-mail together with the policy document so that we can check for compliance during the audits in Suriname. If you	

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		have any questions, please let me know and I wish you good luck with processing possible multiple comments from other submissions.	
06/2023		Proposal to also add below sentence: "For the purposes of this Act, the definitions of section 1 of the NIVS 2021 No. 19 Act shall apply."	This will be considered by the legal drafters, as we aim for consistency
06/2023	Explanatory statement 12	Destruction is also mentioned here, shouldn't destruction be included in article 12?	This will be considered by the legal drafters
06/2023		Other changes have been made directly in the draft law text with track change	These will be considered in the updated version.
06/2023	2:1c was handled under unhygienic conditions;	unhygienic is subjective	<p>Article 2:7 says: <i>The NIVS shall lay down further rules and guidelines for the provisions under paragraphs 1 to 6.</i></p> <p>This means, therefore, that the NIVS will prepare and share with stakeholders the guidelines regarding the (un)hygienic conditions. As a reminder, we state that in accordance with section 3 of the NIVS Act (S.B. 2021 no. 19):</p> <ol style="list-style-type: none"> 1. The decision-making process of the NIVS is anchored in the principles of risk analysis for food safety and nutrition issues, following the guidelines of the Codex Alimentarius Commission (CAC). 2. When the NIVS makes decisions and adopts guidelines on foodstuffs, it strives for harmonisation with international standards as developed by Codex and taking into account local conditions. 3. In carrying out its regulatory duties, the NIVS should observe the following values: transparency, inclusiveness, impartiality and proportionality to risk. <p>In addition, the explanatory memorandum states the following: <i>The NIVS will develop requirements for food business operators to operate as approved food businesses, including the development of food safety assurance programmes such as Good Agricultural Practices (GAP), Good Hygiene Practices (GHP) or Good</i></p>

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			<p><i>Manufacturing Practices (GMP), HACCP principles-based control procedures or the establishment of criteria for the development of such programmes, and traceability requirements.</i></p> <p><i>The requirements developed will cover the entire food chain, from agricultural activities (with specific food safety requirements) to processors, retailers, importers and exporters.</i></p> <p>This once again confirms that guidelines for hygienic production will be developed.</p>
06/2023	2:1e treated with additives, pesticides and veterinary drugs;	<p>Why? It is normal for the industry to use this.</p> <p>Shouldn't there be a list of permitted additives and max permitted amount and for the other MRLs</p> <p>The terms are also undefined.</p>	<p>It is indeed normal to use additives, pesticides and veterinary drugs. However, this law article says: <i>It is prohibited to produce, import and or sell a foodstuff, which is in violation of the rules and regulations established by the NIVS, if it:</i></p> <p>So this means that <u>only</u> if the food does not meet the regulations of the NIVS then it is prohibited to produce, import and or sell this food</p> <p>Indeed, the NIVS will be <i>responsible for setting maximum residue limits</i> as per section 5:2 of the NIVS Act (S.B. 2021 no. 19). In doing so, the NIVS will in accordance with Section 6:3 of the NIVS Act (S.B. 2021 no. 19): <i>In carrying out these tasks, in addition to the Codex Alimentarius standards, the national standards in the field of foodstuffs, as established by the Suriname Standards Bureau (SSB), will also serve as guidance.</i></p>
06/2023	2:1f enriched with nutrients	Why? Extra vit C in juice is not allowed? Or is it about claims?	<p>Nutrient-enriched foods are allowed provided they <i>comply with NIVS rules and regulations</i></p> <p>In drafting these rules and regulations, the <i>Codex Alimentarius standards and the standards developed by the Suriname Standards Bureau will serve as guidelines.</i></p>

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06/2023	5:1 Export of food and feed requires an export certificate issued by the NIVS.	What are or will be the requirements for an export certificate?	The requirements for an export certificate are determined by the country being exported to
06/2023	5:2 The NIVS may exempt certain companies from the provisions of paragraph 1.	On what basis can exemption be granted?	If the importing country does not require an export licence then that is the reason for granting exemption
06/2023	5:3 The NIVS may grant exemptions from paragraph 1 for certain food and feed products.	On what basis can exemption be granted?	If the importing country does not require an export certificate for certain food and feed products then that is the reason for granting exemption
06/2023	8:1 The control and supervision of compliance with the rules and regulations issued under or pursuant to this Act shall be entrusted to the NIVS and its organs.	Which organs are involved?	As per its approved organisational structure, the NIVS has 3 directorates (bodies). One is the Directorate 2-Field and Scientific Operations that will be in charge. This directorate will collect all food regulation tasks and support compliance monitoring through field inspections.
06/2023	8:3 The NIVS may adopt further rules regarding monitoring and compliance.	To what extent can/should NIVS do this? Shouldn't the rules document go to Council of Ministers first?	Section 13(2) (Transitional Provisions) of the draft Food Act states that the rules to be adopted by the NIVS shall be ratified by or pursuant to a state decree.
06/23	1d <i>any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be, consumed by humans as well as any substance intentionally added to the food during its manufacture, preparation or treatment;</i>	The law talks about food quality	Article 1d is a definition for the term food which is a generic term for the application of the law (products that are regulated through the law)

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06/23	1e <i>Food law: the legal regulations relating to food in general and food safety in particular, in the context of the production, processing and distribution of food, as well as of feed produced for, or fed to, food-producing animals;</i>	Animal feed basically falls outside this food law, based on the definition of food indicated in 1.d	The definition of animal feed is given in section 1h of Act NIVS (S.B. 2021 no. 19) Indeed the regulation of feed in relation with animal health provisions is outside of the NIVS mandate. However, as per the Codex Alimentarius requirements, when feed safety has an impact on human health (i.e. food safety), then it becomes part of the mandate of NIVS (mirroring Codex).
06/23	1f <i>Food business: an undertaking or part of an undertaking, whether public or private, which operates, whether for profit or not, at any stage of the production, processing and distribution of food or feed;</i>	Food business and animal feed does not include food as indicated in 1.d	Please see above – Same rationale.
06/23	2:1 <i>1.It is prohibited to produce, import and or sell a foodstuff, which are in violation of the rules and regulations set by the NIVS, if it:</i>	This paragraph is vaguely defined and does not provide a clear delineation. Production, import and sales are currently a matter of the Ministry of Economic Affairs Entrepreneurship and Technological Innovation. Not of the NIVS. In future, will these tasks no longer belong to the aforementioned ministry?	The main tasks of the NIVS are: a) monitoring all aspects of food safety and food quality management, including the prevention and mitigation of food fraud. b) monitoring all applications and practices related to agriculture, animal husbandry, and fisheries including animal and plant health, provided that these applications have a direct impact on food safety and thus human health, in which case they do fall under the supervision of NIVS. of locally produced, imported and offered for sale food products. The Ministry of Economic Affairs Entrepreneurship and Technological Innovation is in charge of trade matters, not food safety and quality matter.

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06/23	2:1e treated with additives, pesticides and veterinary drugs;	Control of pesticide use is regulated by the Pesticides Board. Animal medicines are used in living animals. As long as the animal is alive, it is not yet a foodstuff	In accordance with section 5:2 of the NIVS Act (S.B. 2021 no. 19), the NIVS is charged with: <ul style="list-style-type: none"> • Monitoring plant protection products and biocides and setting maximum residue limits. • Monitoring fertilizers and other substances used for and/or applied to crops intended for human consumption. • Monitoring veterinary substances used in feed intended for animals, which will be used for human consumption. As indicated above for feed, when the application has a human health / food safety impact, such as the action of setting MRLs for pesticides, this will be carried out by NIVS.
06/23	2:1e and f e. treated with additives, pesticides and veterinary drugs; f. has been enriched with nutrients;	Additive and nutrient definition	Definitions will be developed in the subsequent regulations. The terminology used is well known and identified in Codex texts.
06/23	2:2 <i>It is prohibited to import and or sell feed in violation of the rules and regulations adopted by the NIVS and or because it is intended for food-producing animals and under the feeding conditions applied would result in unsafe or contaminated food or food deemed harmful to human health.</i>	Animal feed falls under the Animal Disease Control Act and Meat and Other Animal Products Inspection Act, so it falls outside the Food Act. Animal feeds are not foodstuffs.	In accordance with section 5:2c of the NIVS Act (S.B. 2021 no. 19), the NIVS is charged with: Monitoring veterinary substances used in feed intended for animals, which will be used for human consumption. Indeed, the regulation of feed in relation with animal health provisions is outside of the NIVS mandate. However, as per the Codex Alimentarius requirements, when feed safety has an impact on human health (i.e. food safety), then it becomes part of the mandate of NIVS (mirroring Codex).
06/23	2:3 <i>It is prohibited to manipulate food, its label or its packaging with the intention of rendering the food harmful to health or raising fears</i>	There is already enough legislation for labelling from the Suriname Standards Bureau and there are also provisions to that effect in the Meat and Other Animal Products Inspection Act (as far as processed meat and animal products are concerned)	We appreciate that a lot of work has already been done on labelling, but as per section 28: 1 of the NIVS Act (S.B. 2021 no. 19), all institutes that have powers relating to food supervision will transfer them to the NIVS.

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	<i>that it will become harmful to health.</i>		NIVS will therefore the sole body responsible for food labelling provisions, which will make it very easy for food operators.
06/23	2:7 <i>The NIVS shall lay down further rules and guidelines for the provisions under paragraphs 1 to 6.</i>	<p>Leave room for arbitrariness. The legislative power in Suriname is formed by, among others, the National Assembly and the government. The NIVS does not fall under the legislative power and is therefore not authorised to lay down further rules and sit in the legislature's chair. Further rules and guidelines may be laid down by order of the ministry in charge of agricultural policy.</p> <p>Note: No ambiguous legislation should be created, which will create ambiguities regarding validity, monitoring, control and enforcement among society/stakeholders</p>	<p>Section 13(2) (Transitional Provisions) of the draft Food Act states that the rules to be adopted by the NIVS shall be ratified by or pursuant to a state decree.</p> <p>Moreover there is no room for the arbitrary as the food law proposes very strict conditions for the way food will be regulated in the future as expressed in the principles and requirements set by the law:</p> <p>Article 2:7 says: <i>The NIVS shall lay down further rules and guidelines for the provisions under paragraphs 1 to 6.</i> This means, therefore, that the NIVS will prepare and share with stakeholders the guidelines regarding the (un)hygienic conditions. For the sake of completeness, we state that as per Section 3 of the NIVS Act (S.B. 2021 no. 19):</p> <ol style="list-style-type: none"> 1. The decision-making process of the NIVS is anchored in the principles of risk analysis for food safety and nutrition issues, following the guidelines of the Codex Alimentarius Commission (CAC). 2. When the NIVS makes decisions and adopts guidelines on foodstuffs, it strives for harmonisation with international standards as developed by Codex and taking into account local conditions. 3. In carrying out its regulatory duties, the NIVS should observe the following values: transparency, inclusiveness, impartiality and proportionality to risk.
06/23	3:1/ 3: 2	Can be removed from the law because it leaves room for arbitrariness. Whether or not a company may be established is a matter for the	Please see the response above, The way this law was developed is that it acts as a framework law with clear principles guiding further regulatory requirements.

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	<p>1. <i>To operate as a food company, registration and recognition by the NIVS is required.</i></p> <p>2. <i>The requirements and procedures for the registration and recognition referred to in paragraph 1 shall be established by the NIVS.</i></p>	<p>Ministry of Economic Affairs Entrepreneurship and Technological Innovation</p>	<p>All requirements will need to be developed in accordance with due process as defined by the law and explained above.</p>
<p>06/23</p>	<p>4</p> <p><i>Conformity assessment bodies may be authorised by the NIVS, upon their request, to verify compliance with national and international requirements with food safety in order to know compliance with rules to be established by the NIVS.</i></p>	<p>Certification and standards are voluntary.</p> <p>During the stakeholder meeting on 7 June 2023, the ISO certification system etc was already cited. This provision in Article 4 leaves room for arbitrariness. The Suriname Standards Bureau is already active in this framework.</p> <p>What does a conformity assessment body entail and what are its duties and powers?</p> <p>Who will take a seat and what are their qualifications?</p>	<p>The Explanatory Memorandum says: The NIVS may accredit or authorize an institution that conducts conformity assessments in Suriname or abroad and whose activities relate to food products produced in Suriname or to be imported into Suriname to act as a conformity assessment body.</p> <p>Conformity assessment is the systematic examination to determine to what extent a product, process or service meets specific requirements</p> <p>A conformity assessment body is one that is authorized and is competent for all actions to be carried out as part of the conformity assessment process;</p> <p>Any operators that is certified in accordance with a scheme recognized by NIVS by a reputable conformity assessment body, will be offered the relevant treatment by NIVS (i.e., considered lower risk).</p> <p>In developing, the requirements of the applications of this provision, NIVS will apply the guidance developed by Codex on the voluntary Third Party Assurance Schemes (vTPA).</p>

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06/23	<p>5:1</p> <p><i>Export of food and feed requires an export certificate issued by the NIVS.</i></p>	<p>This leaves room for abuse of power. What does the NIVS export certificate entail?</p> <p>Anyone wishing to export requires a veterinary export certificate unless the importing country does not require one. The NIVS cannot determine for the importing country whether or not a certificate is required as defined in Article 5</p>	<p>It is not the intent of NIVS to make such determination, rather the requirements of the export country, in the same fashion, veterinary certificates are needed for live animals.</p>
06/23		<p>And how would this export certificate as referred to in this article compare with the veterinary export certificate of the veterinary services acting in accordance with the Meat and Other Animal Products Inspection Act and the Animal Diseases Control Act?</p>	<p>The veterinary certificate will be focused on animal health requirements as per the provisions of the World Organization for Animal Health (WOAH), where relevant.</p> <p>The NIVS health certificate will focus on the food safety considered, included in the mandate of Codex and therefore of NIVS (NIVS mandate is mirrored on Codex mandate).</p>
06/23	<p>6</p> <p><i>1. A food business operator may be required by the NIVS to disclose information on food production or handling if the NIVS demonstrates that such information is necessary in the public interest or to ensure food safety.</i></p> <p><i>2. Disclosure requirements and procedures shall be established by the NIVS.</i></p>	<p>No institution should force a company to disclose corporate information. This is an abuse of power and arbitrariness. Only in a staff investigation could this be on the charge of the prosecution</p>	<p>All modernized food legislative systems made provisions for such disclosure under the needed circumstances, to protect public health.</p> <p>No abuse of power is intended through this provision, in line with other international food regulators.</p> <p>Moreover, the international Health Regulations, mandate Suriname to disclose information related to health related issues, including foodborne related issues, that may be spread by products originating or transiting through Suriname. Such obligation would not be fulfilled, unless Suriname i.e., NIVS has such powers.</p>
06/23	<p>7:2</p> <p><i>Recall requirements and procedures are set by the NIVS.</i></p>	<p>There are already procedures at various agencies where this is regulated. This is also a task of the BOG and the Veterinary Services. This article could be reworded</p>	<p>We appreciate that a lot of work has already been done on product recall procedures, but as per Section 28: 1 of the NIVS Act (S.B. 2021 no. 19), all institutes that have powers related to food monitoring will transfer them to the NIVS.</p>

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			NIVS will use all the experience gathered and developed by all government organizations of similar mandate to develop its own procedures and protocols for this purpose.
06/23	8:1 <i>The control and supervision of compliance with the rules and regulations issued under or pursuant to this Act shall be entrusted to the NIVS and its organs.</i>	An institute cannot be in charge of enforcing a law, but one or more ministries	The NIVS operations are based on a successful Suriname story of transforming a food regulator, i.e. VKI. VKI was empowered to enforce fish inspection and management requirements and NIVS intends to follow the same model.
06/23	8:3 <i>The NIVS may adopt further rules regarding monitoring and compliance.</i>	Leave open the possibility for abuse of power. The NIVS is not a legislature. Further rules must be made by order of the minister in charge of agricultural policy. Also missing is involvement of the Ministry of Justice and Police and other ministries that were jointly involved in the implementation of the Foodstuffs Act 1911	Section 13(2) (Transitional Provisions) of the draft Food Act states that the rules to be adopted by the NIVS shall be ratified by or pursuant to a state decree. The same explanations about the process to be applied in developing regulations and explained above will apply. Moreover, the NIVS law is meant to be a modernized legislation offering a framework for the regulation of food, where such regulations are more technical and will therefore be subject to regulatory texts to be developed with all the diligence required, as well as in alignment with the requirements set by the law.
06/23	10 <i>A person who performs any duty by virtue of the application of this Act or regulations issued or decrees made under this Act shall be prohibited from making further or other use of data or information provided or received under this Act, from disclosing it further or otherwise, than for the performance of his duty or required</i>	Runs counter to what has been cited in Article 6. Article 6 should be taken out of this law	Article 10 is an article that protects Confidential Business Information (unless for the public interest). Article 6 explains the exception : i.e. disclosure only for the public interest. There is no contradiction apparent or implied.

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	<i>by this Act, unless it is information which must be disclosed for the protection of public health if circumstances so require.</i>		
06/23	12:3 <i>When acting as such, inspectors must carry a certificate of identity issued by the director of NIVS, stating their name, rank and, if necessary, area of jurisdiction. This proof of identity must be shown on request. Further rules for the identification of inspectors may be laid down by ministerial order.</i>	It is not clear if the NIVS inspectors have different rules from those of the Ministry of Justice and Police	This is NOT a new provision, It has been taken from Act NIVS (S.B. 2021 no. 19) – section Article 134 SV lists the general investigating officers, such as the Police. Article 12 also lists the special investigating officers, in this case the inspectors. For this special group, the rules are contained in the NIVS Act, among others.
06/23	12:6 <i>The sale of seized goods is carried out under the supervision of the NIVS in accordance with Article 82 et seq. of the Code of Criminal Procedure.</i>	Confiscated goods cannot be offered for sale. The public prosecutor or the judge decides what will happen to the property. This is in accordance with the Surinamese Criminal Law	This is NOT a new provision, It has been taken from Act NIVS (S.B. 2021 no. 19)- section 27:6
06/23	12:8 <i>The proceeds of the goods or items referred to in paragraph 6 of this article shall be deposited in the account of the NIVS.</i>	All proceeds from public sales must be paid into the state treasury unless levy has been applied for and obtained from the appropriate authority. This section may need to be removed from the law	This is NOT a new provision, It has been taken from Act NIVS (S.B. 2021 no. 19) - section 27:8
06/23	13:1 <i>On the entry into force of this Act, the Foodstuffs Act 1911 (G.B. 1911 no. 25, text in force G.B. 1953 no. 134) will be repealed.</i>	Relates to tasks of the Ministry of Health. Cannot be replaced by the NIVS.	This is NOT a new provision, It has been adopted previously i.e., The duties and powers vested in the SSB/Ministry of Health regarding the supervision of food safety and quality are transferred to the NIVS in accordance with Section 28: 1 of the NIVS Act (S.B. 2021 no. 19).

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		<p>The 1911 Food Act is very broad and includes the quality of milk and dairy products. How will the NIVS be able to check every food product: Is there framework and expertise in place?</p>	<p>As part of its commitment to implement best practices in food regulatory practices, NIVS has developed a strategic plan for the period 2023-2025 that will guide its food regulatory oversight, planning and operationalisation of its food control programme. One of the strategic goals is to build a dynamic and professional workforce to enable effective food regulation</p>
06/23	13	<p>What will happen to the other bodies that currently have legal authority over food such as the SSB? Will these cease to exist?</p>	<p>The other institutes including the SSB previously working on food, have a much broader mandate beyond food and will continue to enjoy their powers accordingly. These institutes in charge of food supervision do not cease to exist, but in accordance with section 28: 1 of Act NIVS (S.B. 2021 no. 19), they transfer only those powers related to food supervision to the NIVS.</p>
06/23		<p>There is no article relating to appeal in this Act if a certificate is denied. What are the conditions for getting the Section 5 certificate and on what basis is a decision taken ? At what deadlines how is the stakeholder informed about this? Who from the NIVS takes the decisions?</p>	<p>Section 23 (OBJECTION AND APPEAL) of the NIVS Act (S.B. 2021 no. 19) describes objection and appeal</p>
06/23		<p>General The ministry in charge of agricultural policy will never be able to be in charge of implementing this law by itself and alone. This will require cooperation from the Ministry of Health and Economic Affairs Entrepreneurship and Technological Innovation. Adoption of this law, without legal ministerial cooperation, will create problems in monitoring and enforcement.</p>	<p>There is statutory ministerial cooperation at two levels. The Ministers in charge of Public Health and Economic Affairs Entrepreneurship and Technological Innovation, together with the Minister in charge of Agricultural Policy in accordance with Article 15 of the NIVS Act (S.B. 2021 no. 19), are part of the Consultative Body which, in accordance with Article 16 of the same Act, must consult on proposals of measures and responsible for strengthening food safety policy and supervision. The said ministries take part in the Supervisory Board of the NIVS in accordance with Article 17:2a, 2b and 2c, and as Council members, they must provide policy support to the Director in accordance with Article 18.</p>

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06/23		Page 2 (1 ^e paragraph), under policy guidelines, push for single food regulator: There are other institutes also in charge of food. Will those cease to exist?	Please see above – same response
06/23		Page 2 (2 ^e paragraph), the mandate of the NIVS: not clearly defined, is far too broad and leaves room for arbitrariness.	Section 6 of NIVS Act (S.B. 2021 no. 19) describes the mandate of NIVS This mandate is mirrored on the scope of Codex and is therefore neither arbitrary nor random.
06/23		Page 2 (2 ^e paragraph), the obsolete nature of the current food safety legislation: instead of this should be indicated, the Foodstuffs Act (G.B.1911 no. 25, text in force, G.B. 1953 no. 134)	This information is mentioned as background. All previous food related laws are meant to be repealed with the adoption of the new provisions.
06/23		In fact, it would be better to update the old Food Act of 1911 so that there is no need to reinvent the wheel with the drafting of a new law (Food Act) and system with the same purpose as many legislative products currently already aim for and are still workable in this day and age.	It is more than indispensable to develop a new law based on the modernized food legislative requirements adopted by several countries, both developed and developing. The 1911 law is not only obsolete but was developed during a time where even the knowledge of food safety hazards are limited and would not be envisaged through the preventive approach advocated by modernized food legislative frameworks.
06/23	2, paragraph 4 <i>A special situation arises in cases where foodstuffs have components or residues in them, originating, for example, from plants and animals, for which the NIVS has not yet made regulations. This would imply that they are not prohibited. However, it could be that the aforementioned plants and animals do fall under the protection of international regulations, treaties</i>	And law cannot be anticipatory. Risk of arbitrariness and abuse of power	On the contrary, the law is making provisions to use scientific knowledge (through risk assessments) and international benchmarking (as indicated in this provision) to determine the safety of food product.

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	<i>to which Suriname is a party. In that case, that food will therefore fall under the category of prohibited food.</i>		
06/23	2, paragraph 8 <i>Food regulations will focus on preventing the introduction of food safety hazards into the food supply chain, and not on the control of finished products through finished product testing, although the latter measure may be applied as part of the food control activities of the NIVS.</i>	What exactly will be done? Where does the mandate of the NIVS begin and end? The boundaries must be clear. The NIVS should not sit in the chair of existing institutions, otherwise there will be confusion in society	Section 6 of NIVS Act (S.B. 2021 no. 19) describes the mandate of NIVS which is mirroring the mandate of Codex. It is important to note that this principle is taken from the main codex text on food control CXG82-2013.
06/23	5	Export certificates are mandatory unless dispensation has been granted by the NIVS: contradiction. On what basis will there be dispensation? Open to arbitrariness?	This is a repetitious comment, explained above.
06/23	6	Only the Ministry of Justice and Police, in this case the Public Prosecution Service, can order information to be disclosed	This is a repetitious comment, explained above.
6/23	2:1a	In blue the stakeholder amendment proposals 1. It is prohibited to produce, import and or sell a foodstuff, which: a.- contrary to the rules and regulations adopted by the NIVS; if it:	Thank you for the input but the way this is currently drafted, convey the same meaning that you are trying to communicate through your proposal. This provision is meant to ensure that Imports are compliant with regulatory requirements set by NIVS and /or are not posing a health risk to Surinamese consumers.
6/23	2:1c was handled under unhygienic conditions;	Unsanitary by what standard?	Article 2:7 says: <i>The NIVS shall lay down further rules and guidelines for the provisions under paragraphs 1 to 6.</i> This means, therefore, that the NIVS will prepare and share with stakeholders the guidelines regarding the (un)hygienic conditions.

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			<p>For the sake of completeness, we state that as per Section 3 of the NIVS Act (S.B. 2021 no. 19):</p> <ul style="list-style-type: none"> • The decision-making process of the NIVS is anchored in the principles of risk analysis for food safety and nutrition issues, following the guidelines of the Codex Alimentarius Commission (CAC). • When the NIVS makes decisions and adopts guidelines on foodstuffs, it strives for harmonisation with international standards as developed by Codex and taking into account local conditions. • In carrying out its regulatory duties, the NIVS should observe the following values: transparency, inclusiveness, impartiality and proportionality to risk. <p>In addition, the explanatory memorandum states the following: <i>The NIVS will develop requirements for food business operators to operate as approved food businesses, including the development of food safety assurance programmes such as Good Agricultural Practices (GAP), Good Hygiene Practices (GHP) or Good Manufacturing Practices (GMP), HACCP principles-based control procedures or the establishment of criteria for the development of such programmes, and traceability requirements.</i> <i>The requirements developed will cover the entire food chain, from agricultural activities (with specific food safety requirements) to processors, retailers, importers and exporters.</i></p> <p>This once again confirms that guidelines for hygienic production will be developed.</p>
6/23	2:1d Falsified;	Include falsified in list of definitions? What is meant by falsified?	Adulteration includes all aspects of fraud, including forgery / falsification. Section 1 of the NIVS Act (S.B. 2021 no. 19) has a definition of food fraud which refers to adulteration.

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6/23	2:1f is enriched with nutrients;	Include nutrient enrichment in list of definitions? What is meant by this?	Food fortification should happen based on health considerations that may require clear regulatory guidance. This provision is meant to ensure that enriched / fortified foods (where required) are complying with such safety requirements. NIVS will develop the relevant regulations for this purpose, following the same approach of transparency, inclusiveness and engagement as described above.
6/23	2:1g considered new;	Include term new product in list of definitions? Explanation of why it is or is not prohibited to produce, import and or sell new products?	Novel foods are foods that do not have safe and documented history of use in Suriname or in other countries, this may include new sources of food (e.g., insects) or new ways to produce foods that are not commonly used (no history of safe use) e.g., cultured meat / cell based meat – NIVS will develop the relevant regulatory provisions to define novel foods and their requirements of safety and associated measures of possible pre-approval where needed.
6/23	2:1i (point i added by stakeholder)	i. contains constituents of genetically modified organisms.	GMOs are part of what is meant by Novel foods (a segment of Novel foods).
6/23	2:2	In blue the stakeholder amendment proposals 2. It is prohibited to import and or sell animal feed, which: a. in violation of the rules and regulations adopted by the NIVS b. are intended for food-producing animals and would result in unsafe or contaminated food under the applied feeding conditions c. if food is deemed harmful to human health.	This provision was updated with the addition of and/or for each case – which conveys the same meaning your comments propose.
6/23	2:5	Which body determines what is 'false or misleading information'	In accordance with Article 2:7, further rules and guidelines will be drawn up by the NIVS

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	Spreading false or misleading information about food is prohibited with intent to create well-founded fear in others, including information about food processing.		False can also be determined based on the facts at hand, upon investigation. This would be documented with evidence.
6/23	3 1. To operate as a food company, registration and accreditation by the NIVS is required. 2. The requirements and procedures for the registration and recognition referred to in paragraph 1 shall be established by the NIVS.	Attention to provisions/clauses, that e.g. A mango or cold coconut seller along the street is not out of line)	The requirements will be adapted to the size of operations and the level of risk. This is one of the key principles that is included in the law that obliges NIVS to consider rules proportional to the issue being managed and in full recognition of the capacity of the sector to comply. NIVS has already adopted this approach as part of its strategic direction (Strategic plan 2023-25).
6/23	11 1. Violation of the provisions of Articles 3, 4, 5, 6 and 7 shall be punished by a imprisonment of not more than one year and a fine of the third category	Attention to provisions/clauses, that e.g. A mango or cold coconut seller along the street will not be trapped)	Same response as above The sanction will be based on the level of risk and will be commensurate to the capacity of the operator.
6/23	1h	h. Animal feed: state definition	The definition of animal feed is given in section 1h of Act NIVS (S.B. 2021 no. 19)
6/23	1i addition	New product/ "Novel product": define for clarity what is meant by New product.	Novel foods are foods that do not have safe and documented history of use in Suriname or in other countries, this may include new sources of food (e.g., insects) or new ways to produce foods that are not commonly used (no history of safe use) e.g., cultured meat / cell based meat –

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6/23	2:1e treated with additives, pesticides and veterinary drugs;	Which additives? Bread improver is also an additive. Include this in the definitions as well. Pesticides and veterinary drugs above the MRL value should be included.	<p>It is indeed normal to use additives, pesticides and veterinary drugs. However, this law article says: <i>It is prohibited to produce, import and or sell a foodstuff, which is in violation of the rules and regulations established by the NIVS, if it:</i></p> <p>So this means that if the food does not meet the regulations of the NIVS then it is prohibited to produce, import and or sell this food</p> <p>Indeed, the NIVS will be <i>responsible for setting regulations for all these applications determining safe conditions of use that indeed can be authorized. This includes setting maximum residue limits as per section 5:2 of the NIVS Act (S.B. 2021 no. 19).</i></p> <p>In doing so, the NIVS will in accordance with Section 6:3 of the NIVS Act (S.B. 2021 no. 19): <i>In carrying out these tasks, in addition to the Codex Alimentarius standards, the national standards in the field of foodstuffs, as established by the Suriname Standards Bureau (SSB), will also serve as guidance.</i></p>
6/23	2:1f enriched with nutrients	Why is this not allowed? Fortification of milk, flour and other food products is allowed internationally. Our company does fortification (essential nutrients are lost during the process of milling wheat into flour. These are replenished through fortification.	<p>Nutrient-enriched food is allowed provided it complies with NIVS rules and regulations (this starts the law article 2)</p> <p>In drafting these rules and regulations, the <i>Codex Alimentarius standards and the standards developed by the Suriname Standards Bureau will serve as guidelines.</i></p> <p>Food fortification should happen based on health considerations that may require clear regulatory guidance. This provision is meant to ensure that enriched / fortified foods (where required) are complying with such safety requirements. NIVS will develop the relevant regulations for this purpose, following the same approach of transparency, inclusiveness and engagement as described above.</p>

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6/23	2:1g. considered new;	bv: Our company now produces pasta products from its own flour. Does this fall under a new product? Please define what is meant by new product	<p>No this does not fall under a new product. A "new product" (novel foods) are "novel" foods and ingredients not previously sold as food in Suriname. Examples of novel foods are products obtained from new sources or produced using a 'new' method. Think of modern biotechnology, nanotechnology or a new breeding or culture technique. Sometimes they involve a combination of new ingredients and new production methods.</p> <p>Also see the answer above,</p>
6/23	5:1 Export of food and feed requires an export certificate issued by the NIVS.	Where can the requirements for exemption be read back?	<p>The requirements for an export certificate are determined by the country to which it is being exported. If the importing country does not require an export certificate then that is the reason for granting exemption.</p>
6/23	Paragraph 1(g) includes foods that are to be considered novel. They are generally referred to as "novel product", which means that the product did not exist before and therefore no information about it was known before. Therefore, the product must first be examined and found suitable before it may be imported and/or traded. This includes products manufactured using a novel process. For those products, the same rules apply as for novel products.	"before it may be imported and traded" --> should this also read and may be produced?	This is a valid point and it will be adjusted accordingly.