



## **CAMEROON BIOSECURITY PROJECT**

*Development and Institution of a National Monitoring and Control System (Framework)  
for Living Modified Organisms (LMOs) and Invasive Alien Species (IAS)*

# **COMMODITY AUDIT SYSTEMS FOR COMPLIANCE WITH RISK ASSESSMENT PROFILES**

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Cameroon via the Ministry of Environment, Protection of Nature and Sustainable  
Development.*

**Under the Supervision of:**

Project Component Two Taskforce (MINADER)

&

The Biosecurity Project Coordination Unit (MINEPDED)



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## LIST OF ACRONYMS AND ABBREVIATIONS

ANOR	Agence des Normes et de la Qualité du Cameroun
BRM	Biological Risk Management
CBD	The Convention on Biological Diversity
CABI	Centre for Agriculture and Bioscience Institute
CBP	Cameroon Biosecurity Project
Codex	Codex Alimentarius Commission
CPC	Crop Protection Compendium
CAS	Commodity Audit Systems
EFSA	European Food Safety Authority
GEF	Global Environment Facility
IAS	Invasive Alien Species
IMPM	Institut de Recherche Médicale et de Plantes Médicinales (Institute of Medical Research and the Study of Medicinal Plants)
IPPC	International Plant Protection Convention
IRAD	Institute of Agricultural Research for Development
ISPM	Institut Supérieur du Management Public (Higher Institute of Public Management)
LANAVET	Laboratoire National Veterinaire (National Veterinary Laboratory)
LMOs	Living Modified Organisms
MINADER	Ministère de l'Agriculture et du Développement Rural (Ministry of Agriculture and Rural Development)
MINMIDT	Ministry of Mines and Technological Development
MINEPAT	Ministère de l'Economie, du Plan et de l'Aménagement Territorial (Ministry of Economy, Planning and Regional Development)
MINEPDED	Ministère de l'Environnement, de la Protection de la Nature et du Développement Durable (Ministry of Environment, Protection of Nature and Sustainable Development)
MINEPIA	Ministère de L'Elevage, des Pêches et des Industries Animales (Ministry of Animal Husbandry, Fisheries and Animal Industries)
MINFOF	Ministère de Forêts et de la Faune (Ministry of Forestry and Wildlife)
MINRESI	Ministry of Scientific Research and Innovation
MINSANTE	Ministère de la Santé Publique (Ministry of Public Health)
MINESUP	Ministère de l'Enseignement Supérieur (Ministry of Higher Education)
MINT	Ministry of Transport

OECD	The Organisation for Economic Co-operation and Development
OIE	The World Organization for Animal Health
UNCITRAL	The United Nations Commission on International Trade Law
UN/CEFACT	The United Nations Centre for Trade Facilitation and Electronic Business
UNEP	United Nations Environment Programme
SPS	Sanitary and Phytosanitary Standards
WCO	The World Customs Organization
WTO	World Trade Organization

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## EXECUTIVE SUMMARY

### **Rationale**

The Ministry of Environment, Protection of Nature and Sustainable Development (MINEPDED) has commissioned under a Biosecurity Project entitled 'Development and institution of a National Monitoring and Control System for Living Modified Organisms (LMOs) and Invasive Alien Species (IAS)', the development of a Technical Manual on Commodity Audit Systems and specifically Biological Risk Management (BRM) of biological risks of Living Modified Organisms (LMOs) and Invasive Alien Species (IAS) from production, during transit and post-harvest considering all points of entry in Cameroon.

Drawing on global good practice and existing national initiatives, the Cameroon Biosafety Project (CBP) documented the current biosecurity profile through trade and other activities, identifying the main pathways for species introduction in the country (MINEPDED, 2012). The report highlights the main risk pathways for which specific risks are to be quantified using risk analysis methods to enable implementation of appropriate and effective risk management options (MINEPDED, 2012). Furthermore, the CBP formulated risk management strategies for biological invasion risk pathways in Cameroon (MINEPDED, 2015).

The Technical Manual serves as a guidance document for decision makers in Cameroon providing an overview of the key elements of Commodity Audit Systems (CAS) and highlighting areas of attention that may require capacity building and/ or enhancement. The Technical Manual also serves to inform those responsible at the operational level, namely, Customs Officers, Phytosanitary Inspectors, and other Persons with a mandate to train operational staff responsible for CAS presenting additional aspects to Conventional CAS by drawing special attention to LMOs and IAS.

### **Risk Analysis of Pathways**

IAS and LMOs can be transported into Cameroon via a variety of different pathways either natural and or manmade pathways, several of which are as a result of trade that potentially exposes the country to risk of unintended introduction, establishment and spread of undesired organisms. It is suggested that leakiness of Cameroon's many land border crossings allows people to cross at unofficial entry points along the border avoiding biosecurity procedures and promoting uncontrolled cross border trade. In addition, recognising the challenges to regulate cross border activity that has occurred over time, it is prudent to focus on formal ports of entry (airports, harbour and border posts) as the priority pathways of invasion with the expectation that building a robust process for these could then capacitate the country to encompass and address the other more complex informal entry and exit points.

Largely a desktop exercise the risk analysis of pathways serves to

1. Assess the relative risks of sources and pathways of IAS within Cameroon; and
2. Identify ways to reduce these risks.

Specific questions addressed in a risk analysis of IAS or LMO include:

- How do IAS enter, establish and spread within Cameroon?
- Which sources and pathways account for the majority of spread/ introduction, thus posing the greatest risks?
- In what ways are the risks changing with changing environmental conditions, trade patterns and other patterns of movement?
- How can current and emerging risks be managed?
- On what potential sources and pathways is there insufficient information to identify their importance or to design management strategies?

### **International and National obligations**

Cameroon is party to several international agreements and hosts significant wealth with regards to biodiversity. Most of the international agreements are established to promote and or facilitate trade between countries such as the United Nations Commission for Europe that partners with the Economic Commission for Africa and other continents that ensure safe transfer of commodities and the World Trade Organisation agreements including the Sanitary and Phytosanitary Agreement.

Other pertinent international agreements include the Codex Alimentarius Commission (Codex); the International Plant Protection Convention (IPPC); the World Organization for Animal Health (OIE); the United Nations Recommendation on the Transport of Dangerous Goods – Model Regulations; the United Nations Centre for Trade Facilitation and Electronic Business (UN/CEFACT); the Organisation for Economic Co-operation and Development (OECD); the World Customs Organization (WCO) and the United Nations Commission on International Trade Law (UNCITRAL).

National level implementation of the agreements where relevant is provided. However, complementary and additional national policies and legislations are not featured in the Technical Manual and need to be included.

### **Roles and Responsibilities**

Cameroon has the basic national elements of the required competence to implement an effective CAS under the coordination of MINEPDED as the Competent National Authority for Biosecurity. Thus all matters concerning LMOs and IAS must be referred to it.

For LMOs those responsible at the operational level should be government officials appointed under national legislation, and furnished with the mandate to operate. The national legislation should give those responsible at the operational level the right to enter premises without warning to check for compliance and seize materials/samples if necessary. However, most inspections are undertaken with prior warning to the supervisor of the site and with the full cooperation of the permit holder and site manager.

For IAS, the operational level responsible persons include officers responsible for and or with expertise for sanitary and phytosanitary, disease control and customs at the very least. Thus, the key ministries (MINADER, MINEPIA, MINSUP, MINSANTE and MINFOF) should have either their own staff or agencies that provide oversight to responsible officials at the operational level to implement the CAS. The responsibilities for conduct of CAS for IAS and LMOs can be conferred to the same competent ministries dependent on capacities, competence and staffing availability as the procedures for the two do not differ significantly.

#### **Inspection procedures for IAS/ Non-LMOs**

The conduct of inspection for IAS/ Non-LMOs draws its scope from the Pathway Risk Analysis recommendations and conditions provided to ensure minimal release, establishment and spread of an IAS. In so doing the CAS inspection team focuses on a given set of procedures, identification of the site, sampling methodology, record of the IAS and documentation of the entire process.

The CAS team primarily ensures adequacy of information on the documents presented by the importing party and thus documentation in the form of Import licenses, Bills of lading, Airway bills, Phytosanitary certificates, Export certificates, Certification of germplasm, Certification of fumigation, implementing letters of Agreement and Material Transfer Agreements where relevant are inspected. Sampling is done to establish levels of risk following the identified pathways, scope and conditions for the inspection. The Technical Manual includes templates for reporting to be adapted by those responsible at the operational level and recommendations for communication which is between the site manager and the regulatory agency.

#### **Inspection procedures for LMOs**

Similar to the conduct of inspection for IAS/ Non-LMOs, inspection for LMOs draws its scope from the LMO Risk Analysis recommendations and conditions provided to ensure containment and or confinement to prevent release, establishment and spread of the LMO. In so doing the CAS inspection team focuses on a given set of procedures, identification of the site, sampling methodology, record of the IAS and documentation of the process.

Inspection procedures for LMOs provide a basis for a logical and step-wise approach to: preparing for the inspection, conducting the inspection, interviewing personnel, collecting pertinent information, obtaining evidence for key information, writing the inspection report, notifying the regulatory authority of inspection findings and recommendations, and implementing any corrective action that may be required. The scope of these procedures is for contained biosafety level 2 as this is a containment level recommended for LMO that could be viable in the receiving environment, but are assumed to have a negligible impact or could be easily managed; including those with weedy characteristics or capable of interbreeding with related species in the environment. The Technical Manual also provides a checklist of what needs to be considered for a CAS in the case of contained use of LMOs. Furthermore matters of importance to adhere to in a CAS for LMOs under confined use, transit and storage are made reference to.