

### SRI LANKA ACCREDITATION BOARD for CONFORMITY ASSESSMENT

# SPECIFIC CRITERIA FOR FOOD INSPECTION

#### **ABBREVIATIONS**

IEC International Electro Technical Commission

ISO International Organization for Standardization

SLAB Sri Lanka Accreditation Board for Conformity Assessment

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#### 1. INTRODUCTION

- **1.1** The Accreditation Scheme for the operation of various types of bodies performing inspection of the Sri Lanka Accreditation Board (SLAB) is based on the requirements laid down in of ISO/IEC 17020-General criteria for the operation of various types of bodies performing inspection and cover a wide range of assessments in different fields of Food Inspection .
- SLAB is a autonomous body working under the Ministry of Technology, Research and Atomic Energy, Government of Sri Lanka as the sole body responsible for providing accreditation of inspection bodies in accordance with ISO/IEC 17020:2012.
- **1.2** The requirements stipulated in ISO/IEC 17020:2012 apply to *bodies performing inspection* in different fields. However, in certain instances additional guidance is considered necessary to take into account the type of techniques involved and the expertise required for different fields.
- 1.3 This specific criteria document has been prepared by the Technical Advisory Committee on food inspection bodies and has been authorized for adoption by the Council of the Sri Lanka Accreditation Board (SLAB). Food Inspection bodies seeking accreditation are required to comply with all the requirements listed in the international standard ISO/IEC 17020. This document supplements International Standard ISO/IEC 17020 and provides guidance for the accreditation of food inspection Bodies for both accreditation assessors and for inspection bodies preparing for accreditation.
- **1.4** This Specific Criteria document must be used in conjunction with ISO/IEC 17020. It provides an interpretation of the latter document and describes specific requirements for those clauses of ISO/IEC 17020 which are general in nature. Corresponding reference to the Clauses in ISO/IEC 17020 is indicated in parenthesis in the text of the document. This document should be read in conjunction with the Rules and Procedures of SLAB as applicable to inspection bodies. Further, all inspection bodies shall comply with any national, regional and local laws and regulations as applicable.
- **1.5** The field of food inspection involves a wide variety of techniques requiring different levels of knowledge and expertise in the performance of inspection and interpretation of results.
- **1.6** This document will be periodically reviewed and updated based on experience gained and developments in technology.

#### **2 DEFINITIONS**

**2.1** Inspection & inspection body are defined in the standard. Clarification is given below on other terms, some of which have gained common usage in the food industry; Care should be taken in standards, policies and procedures to ensure clarity of meaning.

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#### 2.1.1 Accreditation

Third party attestation related to a conformity assessment body conveying formal demonstration of its competence to carry out specific conformity assessment tasks.

#### **2.1.2 Client**

In the context of ISO/IEC 17020, the client is the party that commissions work from the inspection body.

#### 2.1.3 Consultancy

Participation in an active and/or creative manner in the development of the processes to be assessed. For example by:

- (a) Preparing or producing manuals, handbooks or procedures.
- (b) Participating in the operation or management system matters.
- (c) Giving specific advice or specific training towards the development of facilities and the implementation of processes or competence.

Consultancy may prejudice the impartiality of the Inspection body in breach of clause 4 of the standard. Further guidance is given at the appropriate point in this document.

#### 2.1.4 Field, type & Scope of Inspection

The scope of accreditation shall be precisely defined in terms of the field, type and scope of inspection.

#### 2.1.4.1 Field

Field of inspection will be the specific food chain category. (Annex 1)

#### 2.1.4.2 Type

Type of inspection will be either Inspection for Statutory Enforcement or Inspections for purposes other than statutory enforcement.

#### 2.1.4.3 Scope of Inspection

Range of inspection may specify one of a number of criteria, for example food safety, food standards, food quality and food hygiene. etc.

#### 3 ADMINISTRATIVE REQUIREMENTS (Clause 5, ISO/IEC 17020:2012)

- 3.1 Food inspections may be conducted for a wide range of purposes at any point in the food chain. The scope of an inspection is required to be transparent and documented in a contract or work order.
- **3.2** Further interpretation of this sub clause may be needed for statutory enforcement situations where there are legal rights of access.

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- **3.3** The range of inspection services offered by a body may be wider than those which are accredited. In this case, the scope of accreditation shall be made clear. Services that are outside the scope of accreditation shall be distinguished from those that are accredited.
- **3.4** Liability insurance shall include Public Liability and Professional Indemnity. Type B bodies, engaged only for 'in-house' inspections may not require professional indemnity insurance.

# 4 INDEPENDENCE, IMPARTIALITY AND CONFIDENTIALITY (Clause 4, ISO/IEC 17020:2012)

**4.1** In some areas of food inspection the provision of consultancy services will be a significant factor affecting the impartiality of the Inspection Body. Bodies shall have adequate separation of activities or staff to be able to demonstrate that inspection is not prejudiced by conflicts of interest.

Inspection bodies may normally carry out the following activities without them being considered as consultancy or being potential conflicts of interest:

- **a**. Normal inspection activities which includes planning & information meetings, examination of documents, auditing and follow up of non-compliances.
- **b**. Arranging and participating as a lecturer in training courses, provided that where these courses relate to quality assurance, inspection standards and any food topics related to the inspection services, they should confine themselves to provision of generic information that is in the public domain, i.e. they should not provide company specific advice that may contravene clause 2.1.4.c.of this specific criteria
- **c**. Making available or publishing information on the Inspection Body's interpretation of the requirements of the inspection standard.
- **d**. Activities prior to inspection aimed solely at determining readiness for inspection. Such activities should not result in the provision of recommendations or advice that would contravene the requirements of (a) to (c) in 2.1.4. The inspection body should be able to confirm that such activities do not contravene these requirements and that they are not used to justify a reduction in duration of the eventual inspection.
- **e**. Performing inspections according to standards or regulations other than those being part of the scope of accreditation.
- **f**. Adding value during inspection visits, for example by identifying opportunities for improvement as they become evident during inspection, but without recommending specific solutions.

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- **4.2** Inspection must remain, and be seen to remain, impartial. Consultancy by a related body must never be marketed together with inspection services and there should be no indication in marketing material (written or oral) to give the impression that the two are linked. It is the duty of the inspection body to ensure that no client is given the impression that the use of both consultancy and inspection services would confer an advantage. There should be no suggestion by an inspection body that a successful inspection outcome would be cheaper or facilitated by the use of any specified consultancy or training services.
- **4.3** The above deals with possible compromise of impartiality by other activities of the inspection body or a related body. In some circumstances the activities of personnel may cause a similar conflict. Two situations in particular are considered. Firstly, the personnel of the inspection body may not necessarily be full-time personnel; their other employment shall not be such as to compromise their impartiality. Secondly, full time employees who have recently joined an inspection body may have a potential conflict of interest as a result of previous employment. In either case, an individual should not perform an accredited inspection on a business where such a conflict may exist, within a period of at least 2 years.

In both cases, the following three elements shall be included in the inspection body's procedures so that impartiality may properly be assessed by both the inspection body and SLAB:

- **a**. Job descriptions for the actual inspection role detailing the nature of the task.
- **b**. A declaration of impartiality by inspector stating that he /she has not undertaken any consultancy, not an ex-employee of the client and has no other conflicts of interests detailing all other interests that may impact on their impartiality.
- **c**. A procedure whereby a client has prior notification of the identity of an inspector and is given an opportunity to identify any possible conflict of interest.
- **4.4** The inspection body has a responsibility to identify and evaluate such situations and assign responsibilities and tasks so as to ensure that impartiality is not compromised.
- **4.5** Inspection bodies carrying out food inspection may be accredited as Type A, B or C bodies.
- **4.6** Type A bodies shall be independent third parties engaged in inspection only. Bodies also involved in consultancy are unlikely to meet all the independence criteria in A.1 of annex A of ISO/IEC 17020.

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#### 5 ORGANIZATION AND MANAGEMENT (Clause 5.2, ISO/IEC 17020:2012)

- **5.1** The role of the technical manager is to oversee the technical content and competence of the inspections and to ensure that SLAB requirements are met. The technical manager shall be a permanent member of staff and will normally be different from the person responsible for quality assurance indicated in ISO/IEC 17020, sub-clause 7.4, although the extent to which different staff members can hold several functions can vary with the size of the organization. The position of technical manager in the organization, however named, shall be shown clearly in the organization chart.
- **5.2** The inspection body shall be able to demonstrate that the work of staff performing inspections is properly supervised by a person familiar with the inspection methods and procedures and the scope and objectives of the inspection. The level of supervision shall be commensurate with the skills and experience of the inspector. Supervision shall also include regular review of inspection reports to ensure that work has been carried out in accordance with the client's requirements and the Inspection body's procedures.
- **5.3** It is permissible to deputize upwards in the management structure as well as downwards.
- **5.4** Requirements for education, training, qualifications and experience should be consistent with the competence criteria described against Annex 2.

#### 6 QUALITY SYSTEM (Clause 8, ISO/IEC 17020:2012)

- **6.1** The policy statement shall include a commitment to compliance with ISO/IEC 17020.
- **6.2** The quality manager has a key position which shall be identified on the organization chart. The quality manager may have other duties but shall have direct reporting access to top management for quality matters. This is a different function to that of the technical manager described in sub-clause 6.3 and, as a rule, it should be the job of a different person.
- **6.3** The purpose of internal quality audits is to verify that the documented operational procedures of the inspection body are being implemented. Internal audit shall include the on-site assessment of staff conducting inspections. This assessment shall be carried out by personnel with the relevant technical qualifications and experience who have been trained in internal auditing and who are sufficiently independent to carry out the assessment audit objectively.

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- **6.4** The internal audit programme for on-site assessments shall be designed so that **every year** it shall include at least one inspection of every field, type and range for which the body is accredited. At the same time, the plan shall ensure that every inspector is assessed on-site at least **once in a four year** period for every field, type and range of inspection for which he/she is considered to be competent.
- **6.5** System review should take place at **least once per year.**

#### 7 PERSONNEL (Clause 6.1, ISO/IEC 17020:2012)

- **7.1** Permanent staff shall be under contract to the inspection body and shall have signed a statement to confirm that they understand and will comply with the inspection body's quality policy and procedures. Staff retained on a long term contract but deployed only part time will be regarded as permanent staff provided that, when they work for the inspection body, they shall work under the inspection body's quality systems and procedures. The inspection body shall ensure that staff of this type do not cause any conflict with other requirements of ISO/IEC 17020. In particular, the inspection body shall ensure that other work in which these staff engages does not prejudice their impartiality and integrity in breach of ISO/IEC 17020. The potential for conflict with the confidentiality requirement (ISO/IEC 17020, clause 5) should also be considered.
- **7.2** Inspection staff shall have qualifications, training and/or experience to match the specific inspection tasks in which they are employed; the inspection body shall be able to demonstrate procedures to ensure the required competencies and where needed the ability to make professional judgment. See Annex 2.
- **7.3** The records shall indicate the competency of every member of staff engaged in specific inspection tasks in the fields, types and ranges of inspection covered by the scope of accreditation and the date of their authorization.

#### 8 FACILITIES AND EQUIPMENT (Clause 6.2, ISO/IEC 17020:2012)

**8.1** The provisions of clause 9 shall be met where the inspection body uses its own equipment for tests or measurements to determine compliance with the inspection standard. If inspectors rely upon equipment already installed in the premises (or vehicle) under inspection to make such tests or measurements, the inspection body shall ensure that this equipment also meets the criteria of clause 9. Appropriate provisions should be included in the inspection methods and procedures.

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**8.2** If equipment is used by the company being inspected, but not by the inspection body itself, the requirements of clause 9 will not apply. The inspection standard against which the inspector judges conformity may place similar obligations for control, calibration, maintenance etc. of equipment used by the organization under inspection, but the inspector shall apply the specific requirements of the inspection standard and not superimpose requirements from clause 9.

#### 9 INSPECTION METHODS AND PROCEDURES (Clause 07, ISO/IEC 17020:2012)

- **9.1** The inspection body shall ensure that inspection methods to be used are documented and consistent with the scope of the inspection. Where inspection is carried out to determine legal compliance, procedures shall have regard for all the requirements of the relevant Regulations.
- **9.2** The inspection frequency shall be properly planned to achieve an efficient inspection process. The frequency should be related to 'risk' in all its aspects, including the inherent risks of the product or process and the past record of the business. The criteria for planning inspection frequency shall be documented.
- **9.3** The inspection body shall have detailed inspection criteria which are documented and validated especially when published methods are not used.
- **9.4** The scope of inspections shall be clearly defined with respect to field inspection (see Annex 1).

#### 10 RECORDS (Clause 8, ISO/IEC 17020:2012)

10.1 Procedures shall define the records to be kept and the form in which they are to be kept. The period of retention of documents by the inspection body shall be defined; for inspection and complaint records at least 5 years would normally be appropriate and 3 - 5 years for quality system records.

# 11 INSPECTION REPORTS AND INSPECTION CERTIFICATES (Clause 7, ISO/IEC 17020:2012)

**11.1**. The scope of the inspection shall be included in the inspection report in order to allow proper understanding and interpretation. Inspection bodies should have procedures to ensure that inspection reports are delivered to the client in accordance with contractual requirements.

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#### 12 SUB-CONTRACTING (Clause 6.3, ISO/IEC 17020:2012)

- **12.1** Work shall only be sub-contracted in exceptional cases, for example sickness or temporary overload. Accreditation is only granted to a body that demonstrably has the staff and the expertise to carry out the normal functions for which accreditation is sought (see also ISO/IEC 17020, sub-clause 8.1).
- **12.2** When sub-contractors have to be used, the inspection body shall sub-contract to another body accredited to ISO/IEC 17020 by SLAB or accreditation body recognized by SLAB. When laboratory testing forms part of the inspection, the laboratory shall be accredited against ISO/IEC 17025 by SLAB or accreditation body recognized by SLAB

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# Annex 1 FIELDS, TYPES AND SCOPE OF INSPECTION Fields of inspection According based on ISO /TS 22003:2011

Category codes	Categories	Examples of sectors
A	Farming 1 (Animals)	Animals, fish, egg production, milk production, fishing
В	Farming 2 (Plants)	Fruits, Vegetables, grains, spices, Horticulture products
С	Processing 1 (perishable animal products)	Meat, poultry, eggs, dairy and fish products
D	Processing 2 ((perishable fruit and vegetable products)	Fresh fruits and fruit juices, preserved fruits, fresh vegetables, preserved vegetables
Е	Processing 3 (products with long shelf life at ambient temperature)	Canned products, biscuits, snacks, oils, drinking water, beverages, pasta, flour, sugar, salt, oils & fats and food ingredients
F	Feed production	Animal feed, fish feed
G	Catering	Hotels, restaurants
Н	Distribution	Retail outlets, shops, wholesalers
J	Transport and Storage	Transport and Storage

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# Annex 2 QUALIFICATIONS, TRAINING AND EXPERIENCE

#### Training and Experience for specific inspection fields, type and scope of inspection

Inspection bodies shall be able to demonstrate that every inspector has appropriate training and experience for the particular field, type and scope of inspection for which they are considered competent. Inspector competence shall be recorded (ISO/IEC 17020, clause 8.4) at least at the level of each field of inspection and its first sub-division as indicated in Annex 1.

#### Competency Criteria for Inspectors.

Food Chain Industry category Code	Educational Qualification	Training and Knowledge	Work Experience
A	A/L in Biological Science /Animal Science or Chemistry as a subject Or Recognized post-secondary education that includes subject knowledge in Farm Management or Agriculture.	Training on Good Farm Management Practices, animal husbandry and understanding of the associated Food Safety hazards. Knowledge of applicable laws and tech. regulations relating to safety and quality management in farming and animal husbandry.	Three (3) years work experience in the relevant field
В	A/L in Biological Science or Chemistry as a subject. Or Recognized post-secondary education that includes subject knowledge in Farm Management or Agriculture.	Training on Good Agricultural Practices and understanding of the associated Food Safety hazards. Knowledge of applicable laws and tech. regulations relating to safety and quality management in farming.	Three (3) years work experience in the relevant field
С	A/L in Biological Science or Chemistry as a subject. Or Recognized post-secondary education that includes subject knowledge in general microbiology, general chemistry, bio-sciences/ Agriculture, Animal Science or other subjects related to Food Science and Technology, or Food processing.	Training on Food Safety, GMP, Food Microbiology and understanding of the Food Safety hazards in food processing with relevance to meat, fish or dairy industry. (Minimum of 40 h) Knowledge of applicable laws and tech. regulations relating to safety and quality management in food handling and processing.	Three (3) years work experience in a food processing environment or in food processing factory inspections.

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Food Chain Industry	Educational Qualification	Training and Knowledge	Work Experience
category Code			
D	A/L in Biological Science or Chemistry as a subject. Or Recognized post-secondary education that includes subject knowledge in general microbiology, general chemistry, bio-sciences, Agriculture or other subjects related to Food Science and Technology, or Food processing.	Training on Food Safety, GMP, Food Microbiology and understanding of the Food Safety hazards in food processing with relevance to fruit and vegetable. (Minimum of 40 h) Knowledge of applicable laws and tech. regulations relating to food safety and quality management in food handling and processing.	Three (3) years work experience in a food processing environment or in food processing factory inspections.
E	A/L in Biological Science or Chemistry as a subject. Or Recognized post-secondary education that includes subject knowledge in general microbiology, general chemistry, bio-sciences or other subjects related to Food Science and Technology, or Food processing.	Training on Food Safety, GMP, Food Microbiology and understanding of the Food Safety hazards in food processing. (Minimum of 40 h) Knowledge of applicable laws and tech. regulations relating to safety and quality management in food handling and processing.	Three (3) years work experience in a food processing environment or in food processing factory inspections.
F	A/L in Biological Science or Chemistry as a subject. Or Recognized post-secondary education that includes subject knowledge in general microbiology, general chemistry, bio-sciences or other subjects related to Food Science and Technology, or Food processing.	Training on Food Safety, Food Microbiology and understanding of the hazards in feed processing. (Minimum of 40 h) Knowledge of applicable laws and tech. regulations relating to safety and quality management in food /feed handling and processing.	Three (3) years work experience in a food/feed processing environment or in food processing factory inspections.
G	A/L in Biological Science or Chemistry as a subject. Or Recognized post-secondary education that includes subject knowledge in general microbiology, general chemistry, bio-sciences or other subjects related to Food Science and Technology, or Food processing Or Recognize post secondary education in hotel management and catering.	Training on Food Safety, Food Microbiology and understanding of the Food Safety hazards in food preparation and catering. (Minimum of 40 h) Knowledge of applicable laws and tech. regulations relating to safety and quality management in food handling, storage and food Preparation.  Training on FS hazards in catering and food service establishment.	One (1) year work experience in a food processing environment or in catering or food service establishment

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Food Chain	Educational Qualification	Training and Knowledge	Work Experience
Industry			
category Code			
		Training on Food Safety, Food	
	A/L in Biological Science or	Microbiology and under	Six (6) Months work
	Chemistry as a subject.	standing of the Food Safety	experience in a food
77.7	Or	hazards in food handling	distribution chain or
H ,J	Recognized post-secondary	,transport, storage and	food processing.
	education that includes subject	distribution and. (Minimum of	
	knowledge in general microbiology,	40 h)	
	general chemistry, bio-sciences or	Knowledge of applicable laws	
	other subjects related to Food	and tech. regulations relating to	
	Science and Technology, or Food	safety and quality management	
	Storage, distribution.	in food handling and	
		distribution.	

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#### Annex 3

#### COMPOSITION OF THE TCHNICAL ADVISORY COMMITTEE

1.	Mr. B.S.P.Mendis Food Technology Consultant	Chairman
2.	Dr.(Mrs).P.Talgaswatta Deputy Director General Sri Lanka Standards Institute	Member
3.	Mr. E.G.Somapala Former Government Analysts	Member
4.	Dr. Pradeep Kariyawasam Chief Medical officer Colombo Medical Council	Member
5.	Dr. Ananda Jayalal Director Environmental and Occupational Health Unit, Ministry of Health	Member
6.	Ms. Chamila Wijesinghe Research Officer Industrial Technology Institute	Member
7	Ms. S.K.C.Chitrangani Training Executive Ind-expo Certification (Pvt) Ltd	Member
8	Mr. Dhammika Gunasekera Food Processors Association	Member
9	Mr. Vithanage Sahan Thejaka Hygiene Manager Hilton ,Colombo	Member

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