

# Compendium on Food Laws, Policies and Standards in Zimbabwe

A Case Study for Mutare







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The Compendium on Food Laws, Policies and Standards in Zimbabwe: A Case Study for Mutare Urban presents a comprehensive analysis of the legal and policy frameworks that govern food safety and regulation in Zimbabwe. Developed by Green Governance Zimbabwe in partnership with Hivos for the Urban Futures Project the compendium serves as an accessible reference and advocacy tool aimed at strengthening food regulatory systems while enhancing sustainability, public health, and youth participation in the food sector.

This compendium closely examines Zimbabwe's national food laws such as the Food and Food Standards Act [Chapter 15:04] and accompanying Statutory Instruments (SIs) as well as sector-specific regulations covering grain, poultry, fish, dairy, and processed foods. Special emphasis is placed on the urban food system of Mutare, including a critical analysis of local municipal by-laws, regulatory practices, and enforcement mechanisms that directly influence food safety

and value chains within the city. By grounding the analysis in Mutare's unique urban food dynamics, the compendium sheds light on implementation gaps, localized challenges, and opportunities for reform at the municipal level and within the Zimbabwe urban context.

Importantly, the compendium incorporates insights gathered from a diverse range of stakeholders, including experts within the food sector, youth entrepreneurs, food regulators, public health professionals, and other players across the food value chain. Data collection included key informant interviews (KIIs), surveys, and stakeholder consultations, making the study both inclusive and contextually grounded. A strong youth-centered lens was applied to assess how food policies impact young food actors and their enterprises in Mutare.

The analysis identifies several strengths in Zimbabwe's food regulatory framework, such as







provisions for food hygiene, labelling, and basic inspection systems. However, the compendium highlights significant gaps and weaknesses including the absence of risk-based food safety systems like HACCP, outdated legislation, fragmented institutional mandates, and limited harmonization with Codex Alimentarius and global food trade standards. Other critical gaps include inadequate enforcement mechanisms, lack of consumer engagement and transparency, and insufficient focus on sustainability, fortification, traceability, and food system resilience.

Benchmarking Zimbabwe's laws against international standards, particularly those set by Codex Alimentarius, the FAO/WHO, and SADC harmonized frameworks, the compendium makes key recommendations. These include the modernization of core legislation to incorporate science-based and adaptive food safety systems, establishment of a National

Food Control Authority and a National Codex Committee, enhancement of regulatory oversight for fortification, labelling, and certification; and institutionalization of multistakeholder coordination mechanisms. It also calls for enhanced mandatory nutrition labelling, consumer education, and better integration of food safety with climate resilience, digital food systems, and e-commerce.

Ultimately, this compendium aims to guide legal reform, inform policy dialogue, and support implementation of more effective, transparent, and inclusive food regulatory systems. It is both a technical resource and a call to action for policymakers, municipal authorities, food system actors, development partners, and civil society to invest in a resilient, safe, and youth-driven urban food system, one that protects public health, promotes fair trade, and supports sustainable food development in Mutare and beyond.











## Foreword

Access to safe, nutritious, and affordable food is a fundamental right and a cornerstone of sustainable urban development. In Mutare, as across Zimbabwe, this right is safeguarded by a network of food laws, policies, and standards including municipal by-laws that govern production, handling, sale and distribution. Yet, navigating this regulatory landscape remains a challenge for stakeholders across the food value chain. This compendium, developed under the **Urban** Futures Project, provides clarity by consolidating Zimbabwe's food safety legal framework into an accessible reference tool, ensuring compliance while fostering food law and policy compliance and innovation particularly among youth-led food enterprises and value chains.

Green Governance Zimbabwe in partnership with Hivos for the Urban Futures Project, recognizes that effective food systems depend on transparent governance and effective legal regulatory frameworks incorporating global best practices on food regulation. As an organization dedicated to sustainable environmental and resource management, this document serves as a vital bridge between food policy and practice. By outlining key regulations, institutional mandates, and enforcement mechanisms, this

resource empowers food producers, regulators, and consumers to uphold safety standards while identifying gaps for reform. Additionally, the compendium serves not only to inform but also to spark meaningful dialogue on strengthening Mutare's food safety ecosystem through its expose of the strengths, gaps, overlaps and recommendations in advancing existing food laws, policies and standards in Zimbabwe.

We extend our gratitude to our implementing Partner Hivos and the Mutare Consortium Partner Manica Youth Assembly for their partnership, and to all government agencies, civil society organizations, and food entrepreneurs who contributed their expertise. Special acknowledgment goes to the researchers and legal experts who meticulously analyzed Zimbabwe's food regulatory framework to produce this essential compendium.

As Mutare's food economy grows, this compendium stands as a tool for reference, accountability, innovation, and collaboration in food value chains and systems. We invite policymakers, businesses, and communities to use it as a foundation for building a resilient, inclusive, and safe urban food system, one that protects public health, supports livelihoods, and embraces sustainable practices.









## **Acronyms**

AMA	Agriculture Marketing Authority
ARDA	Agriculture and Rural Development Authority
ARNS	Africa Regional Nutrition Strategy
CAADP	Comprehensive Africa Agriculture Development Programme
CAC/GL	Codex Alimentarius Commission/Guidelines
CAC/RCP	Codex Alimentarius Commission/Recommended Code of Practice
CBD	Convention on Biological Diversity
CDS	Catch Documentation Schemes
COMESA	Common Market for Eastern and Southern Africa
DHS	Demographic and Health Survey
EFSA	European Food Safety Authority
EMA	Environmental Management Agency
EU	European Union
FAO	Food and Agriculture Organization
FDA	Food and Drug Administration of the United States of America
FSIS	Food Safety and Inspection Service of the United States of America
FSMA	United States of America Food Safety Modernization Act
GAP	Good Agricultural Practices
GBF	Global Biodiversity Framework
GFSI	Global Food Safety Initiative
GGZ	Green Governance Zimbabwe
GMOs	Genetically Modified Organisms
GMP	General Manufacturing Practices
HACCP	Hazard Analysis and Critical Control Points
IPPC	International Plant Protection Convention
ITPGRFA	International Treaty on Plant Genetic Resources for Food and Agriculture
KIIs	Key Informant Interviews
MICS	Multiple Indicator Cluster Survey
монсс	Ministry of Health and Child Care
MRAs	Mutual Recognition Agreements or Arrangements







MRLs	Maximum Residue Limits	
MSC	Marine Stewardship Council	
MSMEs	Micro, small, and medium enterprises	
NDCs	Nationally Determined Contributions	
NRV	Nutrient Reference Value	
OIE	Office International des Épizooties (OIE) now known as World Organisation for	
	Animal Health	
QA/QC	Quality Assurance/Quality Control	
SADC	Southern Africa Development Community	
SAZ	Standards Association of Zimbabwe	
SMEs	Small to Medium Enterprises	
SPS	Sanitary and Phytosanitary (SPS) Agreement	
SIs	Statutory Instruments	
ТВТ	Technical Barriers to Trade	
UNFCCC	United Nations Framework Convention on Climate Change	
US	United States of America	
WHO	World Health Organization	
WTO	World Trade Organization	
ZIMRA	Zimbabwe Revenue Authority	
ZNFC	Zimbabwe Food and Nutrition Council	











## 1.1 BACKGROUND

This compendium was developed through a study which undertook a comprehensive examination of food laws, policies, regulations, and standards governing Mutare's urban food system and Zimbabwe as a whole, with particular emphasis on their implementation, enforcement gaps, and impact on youth-led food enterprises. The research analyzes Zimbabwe's broader food legal framework including legislative provisions which are acts of parliament such as the Public Health Act and Food and Food Standards Act focusing specifically on their application within Mutare's local context. Secondly, the compendium interrogates augmenting Statutory Instruments (SIs), local Mutare urban municipal by-laws addressing food safety and standards and general food regulations in Zimbabwe. The compendium goes further by benchmarking these local regulations with regional and international best practices on food safety and standards, thereby unearthing opportunities for policy improvement and institutional strengthening to enhance food safety,

sustainability, and economic opportunities for young food entrepreneurs in Mutare and Zimbabwe as a whole.

The scope includes detailed regulatory mapping to systematically review food safety laws and their alignment with Mutare's urban food ecosystem. This involves examining the roles and responsibilities of various regulatory bodies, food systems and value chains experts and assessing compliance mechanisms and overlaps. The study incorporates perspectives from key stakeholders including government regulators, youth entrepreneurs, and consumers regarding compliance challenges and systemic gaps. The compendium adopts a youth-centered analysis which forms the fulcrum of the research, specifically assessing how current policies support or hinder youth participation across the food value chain. The research ultimately aims to produce actionable recommendations for policy reform and improved enforcement mechanisms that can foster a more supportive environment for sustainable food systems and value chains in Mutare.







## **1.2 OBJECTIVES**

The main purpose of the assignment is to otherwise compile and present a detailed, user-friendly compendium on food laws, regulations, and standards relevant to Mutare, outlining the roles, responsibilities, and duties of regulatory

agencies in ensuring food safety across the food system value chain, from pre-production to post-harvest, consumption, and disposal. This will be guided by the following specific research objectives.

- To review existing laws, regulations, standards, and certifications that govern food systems in Mutare.
- To engage and consult with relevant ministries, departments, agencies, and stakeholders to gather insights, foster alignment, and recommend actionable strategies for enhancing food safety management and regulatory coherence in Mutare's urban food system.
- To identify key gaps, overlaps, and inconsistencies that affect the effective regulation of the food system and value chain in Mutare.
  - To give clear actionable recommendations to improve food laws, regulations, and standards in Zimbabwe.

### 1.3 METHODOLOGY

The methodology was refined following productive consultations with Green Governance Zimbabwe in partnership with Hivos for the Urban Futures Project to ensure alignment with project objectives, budgetary parameters, and timelines. The methodology employed a qualitative, case-study approach focused specifically on Mutare's food regulatory environment. This methodological design allowed for an in-depth exploration of the complex interplay between food laws, their implementation, and their real-world impacts on various stakeholders. The development of this compendium involved rigorous review of national, local, regional and international food laws, alongside thorough stakeholder mapping which embedded consultations with policymakers, regulators, and food system

actors. We engaged institutions such as the Ministry of Health and Child Care, Standards Association of Zimbabwe (SAZ), Environmental Management Agency (EMA), and Mutare City Council to ensure accuracy and relevance.

Data collection was implemented and this incorporated multiple methods such as KII, surveys and questionnaires to ensure comprehensive and reliable findings. The desktop research component adopted followed a top-down analytical framework, examining international conventions, regional standards, national legislation and local Mutare by-laws. Primary data collection included 10 expert interviews conducted through snowball sampling with food law specialists, policy makers, and certification bodies. Additionally, 40 KIIs conducted







employed purposive sampling to gather insights from diverse stakeholders including youth entrepreneurs, regulatory officials, SMEs, and consumer representatives.

The research methodology specifically incorporated youth-focused assessment tools to capture the unique challenges faced by young food business operators. Analytical processes adopted employed rigorous qualitative methods including thematic and content analysis using NVIVO software, which were complemented by comparative analysis against regional and international models. The compendium maintains academic rigor through systematic use of the Medley citation tool for literature review and referencing. This thorough methodological approach ensured that the findings are both technically sound and practically relevant to Mutare's food systems, value chains and specifically the youthful stakeholders.











## 2.1 GLOBAL GEO POLITICS AND THE AFRICAN (MUTARE) FOOD SYSTEMS

Geopolitics plays a critical role in shaping food systems in the Global South, where the intersection of power relations, trade dynamics, and international standards often determines how food is produced, distributed, traded, and consumed. The influence of global powers, multilateral food trade agreements, and international food standard-setting bodies creates both opportunities and vulnerabilities for countries in the Global South, such as Zimbabwe, which are often positioned as exporters of raw agricultural commodities while relying on imports for processed foods and inputs. This geopolitical context means that food laws and policies in the Global South cannot be developed in isolation, they must be contextualized to local realities of food security, cultural diets, indigenous knowledge, and the needs of smallholder farmers, while simultaneously aligning with international standards that govern global food trade.

Such dual pressures can lead to tensions, as strict international sanitary and phytosanitary measures, intellectual property regimes, financial and sustainability requirements may disadvantage local producers and restrict access to markets and the growth of local food systems. Therefore, contextualized yet internationally informed food laws and policies are crucial in balancing the imperatives of protecting domestic food sovereignty and ensuring competitiveness in the global marketplace, while also safeguarding fair trade and the harmonization of food standards worldwide.

## 2.2 THE MUTARE URBAN FOOD SYSTEM CONTEXT

## Key Elements of the Mutare Urban Food System

The Mutare Urban Food System is composed of seven interconnected elements that collectively define how food is produced, transformed,







accessed, consumed, and managed within the city. These elements are: **production**, **processing**, **distribution**, **retailing/markets**, **preparation**, **consumption**, and waste management.

### **Production**

Production encompasses agricultural activities such as crop cultivation, livestock rearing, and fishing. In Mutare Urban, food production is characterized by informal and small-scale agricultural practices, including backyard gardening and maize cultivation on landfills and council land. While the city itself contributes through household-level horticulture for self-sustenance, a significant proportion of food consumed in Mutare Urban originates from surrounding rural districts such as Penhalonga, Nyanga, Chipinge, and Chimanimani. These areas supply a diverse range of produce including cereals, legumes, leafy greens, sweet potatoes, taro root, yams, butternuts, pineapples, avocados, bananas, and sugarcane. Livestock in the broader Mutare District includes cattle, goats, pigs, and chickens, while in urban areas, small livestock such as chickens and rabbits are more common due to space and resource constraints.

#### Processing

Food processing in Mutare Urban involves the transformation of raw agricultural products into consumable or storable goods through preservation, packaging, and value addition. The city has a growing base of micro, small, and medium enterprises (MSMEs) engaged in food processing, particularly in backyard operations. Products include peanut butter, jams, dried fruits, biltong, tree nuts, and various ready-to-eat foods. While historic companies like Cairns Holdings once dominated the formal processing sector, today, youth and women-led SMEs are increasingly shaping this landscape with localized, innovative food products.

## **Distribution**

Distribution refers to the movement of food from producers to consumers and includes transportation, storage, and market access. In Mutare Urban, food distribution systems range from informal models such as open trucks and lorries used by smallholder farmers and traders, to more specialized logistics used by commercial retailers, including refrigerated vehicles for perishable goods. Efficient distribution remains critical to maintaining food availability and reducing post-harvest losses.

## **Retailing and Markets**

Retailing in Mutare Urban occurs across formal and informal sectors. Formal retail is dominated by supermarket chains such as OK, Spar, Pick n Pay, and food outlets like Chicken Inn, Nandos and Chicken Slice. On the other end of the spectrum, informal retail thrives through street vendors, tuckshops, roadside stalls, and mobile traders, largely operated by MSMEs. These informal channels are vital for food accessibility, especially for low-income urban residents.

#### Preparation

Food preparation is a crucial stage that determines the safety, nutritional quality, and palatability of food. In Mutare Urban, food is typically prepared using traditional methods influenced by cultural practices. The preparation process often includes boiling, frying, and roasting, with the majority of households relying on maize-based meals such as sadza, complemented by vegetables, meats, and tubers.

## Consumption

Consumption refers to dietary habits, food choices, and the nutritional patterns of individuals







and communities. In Mutare urban, typical diets mirror national trends, dominated by sadza (maize meal), vegetables, beef, chicken, rice, and seasonal fruits such as bananas and apples. Due to the proximity of high-production zones, unique crops like pineapples, taro root, yams, ginger, and macadamia nuts are more accessible and regularly included in local diets, contributing to dietary diversity.

## **Waste Management**

Waste management is handled primarily by the Mutare City Council, which operates a municipal waste collection system. However, challenges remain in managing food waste generated from markets, households, and food processing enterprises. Strengthening food waste segregation, composting, and reuse practices can contribute to a more sustainable food system.

# 2.3 PRESENT BARRIERS FOR YOUTH PARTICIPATION IN THE FOOD SYSTEM

Youth participation in the food system faces interconnected barriers. In Mutare, general trend of low or limited youth involvement in food system prevails. One significant competing attraction is gold panning, particularly in areas like Marange and Penalonga, which often presents a perceived pathway to quicker and more substantial financial gains compared to the more gradual returns typically associated with agriculture. Furthermore, the agricultural sector itself poses considerable challenges for young people. These include the increasing prevalence of water shortages, the burden of high production costs, often coupled with low returns on investment, the physically demanding nature of agricultural labor, the

impacts of climate change. The alternative livelihoods, such as the second-hand clothing trade facilitated by proximity to Mozambique, also draws youth away from agricultural pursuits. Social issues like drug abuse and a general lack of interest in farming further compound these challenges. The migration of youth, both within the country and internationally, results in loss of both agricultural labor and the intellectual capital needed for innovation and growth in the youth led enterprises. While initiatives such as training centers aim to engage youth, the overarching sentiment suggests that agriculture must offer more immediate and tangible benefits.

Beyond these general challenges, specific obstacles further restrict youth engagement in the food system. Access to land remains a critical impediment. It is characterized by unfavorable lease terms that discourage long-term investment and commitment. Limited funding and financial resource constraints hinder the ability of young individuals to finance agricultural ventures, particularly larger-scale production. Access to viable markets is another significant hurdle, often exacerbated by transportation difficulties. The absence of product certification further disadvantages young producers, limiting their access to more formal and potentially lucrative markets. Output markets frequently lack fair pricing mechanisms, and inadequate marketing infrastructure, especially for informal traders who often include a significant proportion of young people, further hinders their ability to effectively sell their produce. Finally, a general lack of technical capacity regarding farming as a business represents a barrier. Many young individuals lack the necessary knowledge and skills in modern production systems, financial management, and the broader aspects of running a successful agricultural enterprise.









## 2.4 PRESENT OPPORTUNITIES FOR YOUTH PARTICIPATION IN THE **FOOD SYSTEM**

The Mutare context, presents a ground for the rise of youth-led enterprises within the food system. Several key opportunities are emerging that can be leveraged to enhance youth participation. Firstly, the capacity-building initiatives spearheaded by both the government and other stakeholders in the agricultural sector offer avenues for young people to gain skills and employment. Secondly, the growing interest from Western countries (EU) in indigenous Zimbabwean products opens up significant export opportunities for youth-led agricultural ventures. Furthermore, there is an increasing trend in supporting youth initiatives, evidenced by the involvement of the government and international donors such as USAID and the EU, among others.

However, realizing the full potential of these opportunities hinges on strategic considerations in several key areas. Investing in mechanized and labor-saving equipment is crucial to alleviate the demanding physical labor often associated with agriculture, thereby making it more attractive to young people. The development of less labor and resource-intensive urban agriculture presents a vital solution for engaging urban youth in food production. Introducing innovative approaches like gamified sports for development programs can serve as an engaging way to attract youth to agriculture. Facilitating "look and learn" visits to successful agricultural centers established by other young entrepreneurs can inspire and provide practical insights. To foster a strong sense of sustainability and ownership among youth-led enterprises in mutare, implementing organizations should consider an empowerment model where, for instance, external support covers a significant portion (e.g., 90%) of the start-up costs, while the young entrepreneurs contribute a smaller share (e.g., 10%). This approach can cultivate a greater

sense of responsibility and long-term ownership of the enterprises even after project end.

## 2.5 REPRESENTATION OF YOUTHS IN **DEVELOPMENT AND UPDATING** FOOD LAWS, FOOD REGULATIONS, AND FOOD STANDARDS **IN ZIMBABWE**

It appears that the representation of young people in the development and updating of Mutare's food laws, regulations, and standards is an area of concern. In the study, many youths express a lack of awareness regarding platforms for voicing their perspectives on these crucial governance aspects of the food system. The perception is that the existing legal framework governing food systems is outdated, it is compounded by a perceived lack of political will to initiate necessary reviews of policies and inclusive consultations. While direct evidence of the denial of opportunities for youth involvement may be elusive due to the absence of such food policy consultations, historical trends in related policy areas, such as natural resource management, suggest a pattern of limited youth participation in consultation processes.

The experiences shared by sampled youths across various segments of the food chain corroborate this concern. They largely report a lack of access to the decision-making forums where food regulations are deliberated. While some youth with strong political affiliations might have limited access, the majority of those surveyed indicate no participation in any consultations concerning food laws and regulations. Furthermore, the youth highlight a lack of mentorship and support from established stakeholders within the food industry. A recent Statutory Instrument under The Food and Food Standards Act, which appointed a new board, exemplifies this issue. The composition of the board predominantly features older individuals and industry veterans, with a notable absence of young entrepreneurs and, more broadly, youth representation.











# 3. Reveiw of existing food laws, regulations and standards in Zimbabwe

## 3.1 BREAKING DOWN FOOD LAW, POLICIES AND SAFETY STANDARDS

Food law and policy is the complete body of legal texts (laws, regulations and standards) that establish broad principles for food control in a country, and that governs all aspects of the production, handling, marketing, labelling and trade of food as a means to protect consumers against unsafe food and fraudulent practices. It includes national and international, private and public, criminal and administrative provisions

with regard to food.<sup>2</sup> The concept of food law is also expanded to include the legal framework that governs the production, handling, trade, labelling and consumption of beverages. On the other hand, food safety standards are a set of rules and regulations established by governments, international organizations, and industry bodies to ensure the safety and quality of the food supply chain.<sup>3</sup> The standards aim to reduce the risk of contamination, reduce the chances of foodborne illnesses, and protect the workers and customers who come into contact with the product.<sup>4</sup> Typically,

<sup>4</sup> Ibid.







Food law. (n.d.). In ScienceDirect Topics: Agricultural and Biological Sciences. Elsevier. https://www.sciencedirect.com/topics/

<sup>&</sup>lt;sup>2</sup> <u>agricultural-and-biological-sciences/food-law</u> (Original work published in Food Control, 2013). Ibid.

L. Altomonte, An Introduction to *Food Safety Standards*, SafetyCulture (Dec. 22, 2024), <a href="https://safetyculture.com/topics/food-safety/food-safety-standards/">https://safetyculture.com/topics/food-safety-standards/</a>.

<u>food safety</u> standards cover all aspects of food production, from gathering ingredients and materials and processing to packing and distribution.<sup>5</sup>

## 3.2 KEY TENETS OF EFFECTIVE FOOD REGULATORY SYSTEMS

Globally, a set of standard principles has emerged as the foundational tenets of effective food regulatory systems. These core principles are embedded in most national and international food legal frameworks and have proven essential for the effective regulation, implementation, and enforcement of food systems and value chains. Recognized as part of global best practices in food law and policy, the presence of these principles serves as a critical benchmark for assessing the efficacy of food regulatory systems. Conversely, their absence often signals weaknesses within a system, undermining its ability to ensure comprehensive food safety, compliance, and overall regulatory integrity.

# 3.3 UNPACKING THE KEY TENETS OF EFFECTIVE FOOD REGULATORY SYSTEMS

The Codex Alimentarius Commission, together with the Food and Agriculture Organization (FAO) and the World Health Organization (WHO), plays a central role in defining and promoting the core principles that underpin effective food regulatory systems. These principles that these organizations have advanced on food laws and policy provide a solid foundation for developing sturdy food laws and policies that are practical to implement, enforce, and monitor, thereby enhancing the overall integrity and efficacy of food safety governance. These international bodies provide technical guidance, scientific assessments, and policy frameworks that inform and harmonize national approaches to food regulation. The

principles they advocate such as science-based decision-making, risk analysis, transparency, and consumer protection serve as a compact yet comprehensive foundation for the development of robust food laws and policies. When integrated into national legal frameworks, these principles ensure that regulatory systems are not only coherent and enforceable, but also responsive to emerging risks and global food safety standards. This alignment facilitates better implementation, monitoring, and enforcement across the entire food value chain, ultimately safeguarding public health while supporting fair trade and sustainable food systems.









⁵ Ibid.

## 3.4 TABLE HIGHLIGHTING KEY TENETS OF EFFECTIVE FOOD **REGULATORY SYSTEMS**

No.	Core Principle	Description
1.	Science-Based Decision Making	Food regulations, laws and policies should rely on the best available scientific evidence, especially in risk assessment and management.
2.	Precautionary Principle	In the absence of full scientific certainty, precautionary actions should be taken to prevent potential harm to human health and the environment.
3.	Transparency and Accountability	Food regulatory processes must be open, clearly documented, and subject to public scrutiny, with defined lines of responsibility.
4.	Consumer Protection	The primary objective is to protect consumer health by preventing foodborne illnesses, fraud, and deceptive practices.
5.	Harmonization with International Standards	National food laws should align with international frameworks like the Codex Alimentarius to promote consistency and facilitate trade.
6.	Risk Analysis Framework	The food law should have a structured approach involving: <ul> <li>Risk assessment</li> <li>Risk management</li> <li>Risk communication</li> </ul>
7.	Traceability and Recall Mechanisms	Food regulatory systems should allow for tracing products across the supply chain and facilitate rapid recalls when necessary.
8.	Clear Roles and Institutional Coordination	Regulatory agencies must have clearly defined roles, with mechanisms for coordination and information-sharing.
9.	Inclusive Stakeholder Engagement	All stakeholders including government, industry, civil society, consumers, and academia should participate in the development or reform of the regulatory process.
10.	Adaptive and Responsive Framework	Regulations must be flexible and responsive to new risks, technological advances, and shifts in global food systems.
11.	Legal Certainty and Enforcement	Laws must be clear, consistently enforced, and include deterrent penalties for violations to ensure compliance and trust.
12.	Sustainability and One Health Integration	Food Legal frameworks should promote sustainability and recognize the links between human, animal, and environmental health.
13.	Clear Food Safety Regulations	Sets hygiene and safety standards to prevent contamination, adulteration, and foodborne illnesses.









No.	Core Principle	Description
		Hazard Analysis and Critical Control Points (HACCP) – A systematic preventive approach to food safety.
		Maximum Residue Limits (MRLs) – For pesticides, veterinary drugs, and contaminants.
14.	Clear Food Labeling and Understandable Consumer Information	Requires accurate ingredient lists, nutritional information, allergen declarations, and expiration dates.
	Consumer information	Prevents misleading claims (e.g., "organic," "natural," "gluten-free").
15.	Food Additives and Ingredients Regulation	Controls the use of preservatives, colorings, flavorings, and other additives.
		Ensures only approved substances are used in safe quantities.
16.	Food Fraud and Adulteration Prevention	Combats practices like mislabeling, dilution, or substitution (e.g., olive oil mixed with cheaper oils) Examples: • EU Food Fraud Network • US Food Safety Modernization Act (FSMA)
17.	Incorporate International Trade and Standards	The food laws should harmonize regulations to facilitate global food trade (e.g., Codex Alimentarius by WHO/FAO).
		Ensures compliance with import/export requirements.
18.	Regulate Novel Foods and GMOs	The existing food laws should also regulate genetically modified organisms (GMOs), lab-grown meat, and other innovative foods.
		Requires pre-market approval in many jurisdictions (e.g., EFSA in the EU, FDA in the US).
19.	Regulating intersections of Food Law with Animal & Plant Health	Existing food laws should also cover veterinary drug use, pest control, and disease prevention in agriculture.

The core principles of effective food regulatory systems, as articulated by the WHO and FAO primarily through the Codex Alimentarius serve as a critical benchmarking standard for evaluating the effectiveness of food laws, policies, guidelines, and regulations. These principles offer comprehensive regulatory frameworks that promote food safety, protect consumers,

and foster innovation and trade across food systems and value chains. Accordingly, the systematic review and analysis of Zimbabwe's current food laws and policies is grounded in the benchmarking standards established by the Codex Alimentarius and other internationally recognized sources of best practices in food systems and value chains regulation.

Food and Agriculture Organization of the United Nations & World Health Organization. (2020). Codex Alimentarius: International food standards. FAO & WHO. <a href="https://www.fao.org/fao-who-codexalimentarius/en/">https://www.fao.org/fao-who-codexalimentarius/en/</a>











# 4. Systematic Review and Analysis of Food Laws and Policies (Consolidated)

urban>>futures

Zimbabwe has a wide array of food-related laws, policies, and regulations that govern the country's food value chains and broader food systems. These legal instruments include the Constitution of Zimbabwe, Acts of Parliament, Statutory Instruments (SIs), and local by-laws, which often vary across districts. Additionally, international food legal frameworks, regulations and guidelines play a significant role by shaping and influencing our national food regulatory standards. At the customary level, Zimbabwe also has a rich history of undocumented cultural norms and traditional practices, particularly prevalent in rural and traditional African households.

While these customary practices have historically guided food production, handling, and consumption

at community level, they lack formal legal recognition and enforceability. The current body of foodrelated legislation can be broadly categorized into **primary food laws** those that explicitly regulate food systems and ancillary food laws and policies, which support and facilitate the implementation and enforcement of direct food laws. Furthermore. these laws and policies can be subdivided into key thematic areas, including processed and packaged food, grains/cereal, meat, fish and aquatic food, alcoholic/ beverages, dairy, poultry, and general food regulations. International food laws, policies and standards also play a persuasive role in influencing and shaping the Zimbabwean food legal framework. Some of these international laws, policies and standards have been adopted into our local food laws, policies and standards.







# 4.1 THE CONSTITUTION OF ZIMBABWE AND ITS BEARING ON FOOD LAWS AND POLICIES

The Constitution of Zimbabwe, as the supreme law of the land, lays the foundation for state obligations, citizens' rights, and the principles guiding sustainable and equitable food systems. It provides a critical legal and normative framework for food laws and food governance systems. It influences the food law, policy, and governance in several ways.

To begin with, sections 3 and 13 of the Constitution outline the Foundational Values and Principles. Under these sections, the Constitution enunciates the principles of good governance, rule of law, transparency, and participation as core values. These core values are key to ensuring inclusive, accountable, and coordinated food systems

Many young individuals lack the necessary knowledge and skills in modern production systemsof running a successful agricultural enterprise.

regulation and governance in Zimbabwe. Section 13 of the Constitution mandates the State to involve people in the formulation and implementation of development plans and programs, which also include food security and nutrition programs. Chapter 14 and section 264(1) of the Constitution promote decentralized governance, giving provincial and local authorities power to design context-specific food laws, policies, and systems tailored to local needs.

## Rights Expressed in the Constitution and their relevance to food laws and policies

The Constitution enshrines several rights that are directly related to food laws and policies. The right to food is implicitly and explicitly addressed under section 77 of the Constitution. The section constitutionalizes the right to food as a justiciable socio-economic right, placing an obligation on the State to respect, protect, promote, and fulfill the right to adequate and nutritious food. The provision creates obligations on the State to adopt legislative, policy, and administrative measures to ensure that food is available, accessible, adequate, and sustainable. Section 73 on Environmental rights guarantees the right to a healthy environment and environmental rights, which are closely linked to food systems through the ecosystem services that underpin food production. Section 62 enshrines the right to access to information, which also facilitates transparency in food regulation-related issues and helps citizens to access important information on food laws and policies. Section 48 enshrines the right to life, and this right cannot be realized without access to adequate food, which is essential for survival and health.

In a nutshell, the Constitution of Zimbabwe provides the much-needed solid foundation of an effective food regulatory framework and a comprehensive rights-based framework for food law and policy.







## **Processed and Packaged Food Laws and Policies**



The Food and Food Standards Act (Chapter 15:04)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards Act	Primary food law in Zimbabwe.	Partial Alignment with the Codex Alimentarius and the Core Principles
(Chapter 15:04) Enacted 1971 and came into force 28		Covers key areas like food safety, prevention of adulteration, and oversight of imports/exports.
May 1971	<b>Prohibits</b> the sale, importation, and manufacture for sale of food which is falsely described	<b>Includes</b> basic enforcement procedures aligned with Codex.
	Provides for the fixing of standards relating to food and matters incidental	Includes Food Fraud & Adulteration Prevention.
	Key areas of regulation are:  1. Adulteration or false description of food.	Includes Legal Certainty and Enforcement as it clearly highlights offences, penalties for violations to ensure compliance and allows for appointment of inspectors.
	<ol> <li>Control of sale, importation and manufacture of food.</li> <li>Control of mixed or compounded foods.</li> <li>Control of blended foods.</li> </ol>	Partially Includes Clear Roles and Institutional Coordination as it highlights the roles and powers of the inspectors, local authorities and Minister in food regulation.
	<ol> <li>The law also denotes particular administrative procedures:</li> <li>Inspection, seizure and disposal of food.</li> <li>Withdrawal of notice or return of food.</li> <li>Taking of samples and analysis of food.</li> <li>Food found not to be prohibited from sale or manufacture for sale.</li> <li>Proceedings for disposal of food.</li> <li>Cancellation of notice or release of food if undertaking furnished.</li> <li>Detention of food at port of entry.</li> <li>Power of Minister to obtain particulars of food. Minister and local authority can appoint food inspectors.</li> </ol>	and Miniscer in 1000 regulation.











## The Food and Food Standards Act (Chapter 15:04)

Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
Food and Food Standards Act (Chapter 15:04)	1.Lack of Risk-Based and Science-Based Regulations or Provisions  Gap: The Act does not incorporate modern risk-based approaches such as Hazard Analysis and Critical Control Points (HACCP) or risk assessment mechanisms that are essential for evaluating and managing food safety risks.  Codex/Core Principle: This contravenes Codex/Core principles that promote science- and risk-based decision-making in food regulation.  Best Practice Gap: International standards emphasize the need for proactive, not reactive, food safety systems.	Amend the Act to explicitly require food safety regulation to be based on risk assessment and scientific evidence.  Incorporate internationally recognized food safety systems such as the Hazard Analysis and Critical Control Points (HACCP) methodology.  Develop technical guidelines and standards on risk assessment, risk management, and risk communication in line with Codex.
	2. Limited Consumer Protection and Transparency Provisions  Gap: There are no explicit provisions ensuring consumer participation, access to information, or transparency in standard-setting and enforcement.  Codex/Core Principle: Codex emphasizes consumer health protection and transparency as core principles.  Best Practice Gap: Effective regulatory systems integrate stakeholder engagement, including public access to food safety data and decisions.	Establish provisions for consumer rights, including the right to safe food, access to information, and redress mechanisms.  Mandate public consultation and stakeholder engagement in the development and revision of food standards and policies.  Create mandatory consumer awareness and education programs on food safety risks, labeling, and hygiene.
	3. Outdated and Inflexible Legal Framework  Gap: The Act is relatively outdated, with limited responsiveness to evolving food systems, biotechnology, online food markets, and climate change-related food safety issues.  Codex/Core Principle: The Codex calls for responsive and regularly updated laws that can adapt to scientific and market developments.	Conduct a comprehensive review and modernization of the Act to ensure it is responsive to emerging challenges (e.g., biotechnology, climate risks, e-commerce in food).  Insert flexible updating mechanisms such as ministerial powers to incorporate evolving Codex standards and emergency food safety regulations.







Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	Best Practice Gap: Modern regulatory frameworks allow for flexible updating mechanisms to address emerging risks.	Institutionalize regular reviews of the Act and associated regulations at intervals of not more than <b>5 years</b> .
	4. Fragmented Institutional Mandates and Weak Coordination  Gap: While the Act allows the Minister and local authorities to appoint inspectors, it does not establish a coordinated, multi-agency food safety authority or define inter-agency collaboration mechanisms in food regulation.  Codex/Core Principle: Codex recommends integrated national food control systems with clear roles, collaboration, and coordination.  Best Practice Gap: Leading regulatory systems promote a single-window or coordinated approach to enforcement and policy harmonization.	Establish a National Food Control Authority or strengthen inter-agency coordination through a National Food Safety Committee with clearly defined roles.  Institutionalize multi-stakeholder coordination mechanisms across relevant ministries (Health, Agriculture, Trade, Local Government).  Define clear lines of accountability, information sharing, and decision-making between national and local level authorities with a mandate on food regulation.
	5. Weak Enforcement Provisions  Gap: Although inspection, seizure, and detention procedures are outlined, the Act lacks detailed provisions on penalties, compliance incentives, recalls, or sanctions for violations.  Codex/Core Principle: Codex underscores the importance of effective enforcement, including mechanisms for corrective actions, penalties, and traceability.  Best Practice Gap: Effective enforcement includes graduated sanctions, administrative fines, and mandatory traceability and recall systems.	Provide for a graduated enforcement framework, including administrative penalties, suspension of licenses, and mandatory recalls.  Develop and integrate food traceability systems to detect, manage, and recall unsafe food products.  Equip food inspectors with modern tools, training, and authority to enforce food safety laws effectively.  Introduce food business operator obligations, such as recordkeeping, self-monitoring, and reporting duties.
	6. Limited Reference to International Standards  Gap: The Act does not explicitly reference or incorporate Codex Alimentarius standards, nor does it require alignment with international trade-related food safety obligations (e.g., SPS Agreement under the WTO).	Align the law through amending the Act to explicitly reference regional and international food standards such as the Codex Alimentarius standards and World Trade Organization (WTO) principles, particularly the SPS Agreement.







Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	Codex/Core Principle: Codex is designed to support harmonization of food standards for international trade and food safety.	<b>Incorporate</b> mechanisms to adopt or adapt Codex texts as part of national legislation.
	Best Practice Gap: Countries are encouraged to align national laws with international benchmarks to ensure food exports/imports meet global safety standards.	<b>Promote</b> harmonization with SADC and COMESA regional food laws and standards to improve trade and food safety consistency.
	7. No Formal National Codex Structure or Engagement	Institutionalization of Zimbabwe's Participation in Codex Processes
	Gap: There is no formal structure such as a National Codex Committee or Codex Contact Point institutionalized under the law.  Codex/Core Principle: Codex encourages member states to establish Codex-aligned institutional structures for policy coherence and participation in global standard-setting.  Best Practice Gap: Countries typically	Establish a National Codex Committee or formally recognize it in the legal framework, with multi- sectoral representation (government, industry, academia, consumers).  Designate a National Codex Contact/ Focal Point with a clearly defined mandate for engagement in Codex meetings and communication with
	institutionalize Codex focal points to ensure consistent participation in international food governance.	Facilitate capacity-building and training for Codex focal points and stakeholders to improve national participation and influence in international food standard-setting.











## The Food and Food Standards (Import and Export) Regulations of 2015 (SI 8 of 2015)

## Title of Law/Policy Year of Enactment

## Description/Regulatory Focus Area

## Codex Alignment/Inclusion of Core Principles

Incorporates Protection of

practices in food trade

consumer health and ensuring fair

SI 8 of 2015 Food and Food Standards (Import and Export) Regulations

These Regulations prescribe rules for food imported or exported for sale in or outside Zimbabwe.

#### **Partial Alignment**

Came into force 16 January 2015

Food shall be subject to inspection, analysis and, where necessary, to detention, disposal or destruction at any port of entry into or out of Zimbabwe unless the importer or exporter concerned holds a Food Sanitary Certificate issued in respect of the food concerned in accordance with procedure outlined in the Food and Food Standards (Inspection and Certification) Regulations, 2015.

Sets out standards for food import/ export inspection and certification to ensure food safety and consumer protection.

## Partially Recognizes the Use of risk analysis

The Regulations require inspection and analysis of food at entry/exit points but lack a formal requirement for scienceor risk-based decision-making.

Where any food is not specifically covered by the Act, or any regulations, provisions of the CODEX relevant to the food concerned may apply. Where any food is not specifically covered by the Act, or any regulations, provisions of the CODEX relevant to the food concerned may apply.

Partial Alignment to Transparency and stakeholder engagement

The SI has Limited mention of public or stakeholder input into import/ export standards or procedures.

Where Zimbabwe has an equivalence agreement with any country, a certificate equivalent to a Food Sanitary Certificate issued by a competent authority of any such country may be accepted at a port of entry and a preshipment inspection may, unless specifically demanded by a competent authority on good cause shown, not be required.

## Incorporates Clear roles and responsibilities of authorities

SI 8 designates authorities (e.g., port health officers, laboratories) responsible for implementing the law.

Incorporates Efficient inspection, certification, and enforcement Provides procedures for seizure, sampling, detention, release, and re-export of unsafe food.











## The Food and Food Standards (Import and Export) Regulations of 2015 (SI 8 of 2015)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards (Import and Export) Regulations of 2015	1.No explicit adoption of Codex standards in import/export requirements  Gap: SI does not mandate that import/export	Amend SI to explicitly reference Codex standards on imports and exports as the primary benchmark for food safety in international trade
SI 8 of 2015	standards comply with Codex texts, which are recognized under the WTO SPS Agreement.	as recognized under the WTO SPS Agreement.
	Codex/Core Principle: Harmonization of local laws with International Standards.	
	<b>Best Practice Gap:</b> Codex Principles outline imports and exports standards, which are recognized under the WTO SPS Agreement.	
	2. Absence of risk-based inspection and decision-making at air and land borders	<b>Develop and incorporate</b> into the SI a risk-based import/export control system, in line with Codex Guidelines
	Gap: The SI lacks a framework to prioritize import/exports inspections based on risk (e.g., country of origin, product history).	on Import/Export Inspection and Certification (CAC/GL 47-2003).
	Codex/Core Principle: SI not in alignment with Codex/Core principles that promote science- and risk-based analysis and decision-making in food regulation.	
	<b>Best Practice Gap:</b> International standards emphasize the need for proactive, not reactive, food safety systems.	
	3. Lack of provisions on recognition of equivalence and mutual recognition of foreign food control systems.	Introduce provisions within the SI allowing for equivalence agreements and MRAs on food imports/exports based on scientific
	Gap: No mechanism exists for Zimbabwe to recognize trading partners' systems as equivalent where appropriate during exportation/importation of food.	evidence and Codex guidelines
	Codex/Core Principle: Principle on Equivalence, Trade Facilitation on food imports/exports.	
	Best Practice Gap:	









Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
	4. No formal certification system aligned with Codex model certificates  Gap: SI 8 does not require standardized, internationally recognizable certificates for imported/exported food.  Codex/Core Principle: Principles on export/import food Certification and Traceability.  Best Practice Gap: Food regulatory systems should allow for certification and tracing products exported/imported across the supply chain and facilitate rapid recalls when necessary.	<b>Develop and mandate</b> the use of Codex-aligned model certificates for food imports and exports within the SI.
	5. No mechanisms for dispute resolution or appeals in case of import/export rejections  Gap: Importers/exporters have limited procedural recourse if goods are detained or rejected.  Codex/Core Principle: Accountability & Legal Redress.	Create and incorporate a formal appeal process for challenging administrative decisions, with clear timelines and criteria within the SI.



## Food and Food Standards (Inspection and Certification) Regulations (S.I. No. 5 of 2015)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
SI 5 of 2015 Food and Food Standards (Inspection and Certification) Regulations	and Child Care has, in terms of section 27 of the Food and Food Standards Act, concern inspection and certification of food	Strong Partial Alignment  Incorporates Risk-Based Inspection and Certification Adopts a risk-based approach to food inspections and certifications, matching Codex principles (e.g., CAC/GL 26-1997).
Came into force		Mandates Scientific Basis for Decision-Making The regulations require decisions to be made based on scientific evidence, consistent with Codex's science-based food safety frameworks.
	No person shall operate premises in Zimbabwe for the sale, manufacture, production, processing	Includes Food Safety Management Systems (FSMS) Encourages implementation of food safety management systems by food business operators, in line with HACCP principles endorsed by Codex.









## Title of Law/Policy Year of Enactment

## Description/Regulatory Focus Area

Codex Alignment/Inclusion of Core Principles

or treatment of foods without a sanitary certificate for the premises issued in terms of these regulations. The minimum requirements for the certification of premises are set out in the First Schedule.

## Roles and Responsibilities Clearly Outlined SI 5 defines competent authorities, inspectors' roles, and operators' obligations — a global bes

**roles, and operators' obligations** — a global best practice in effective food regulatory standards.

## **Incorporates Certification and Traceability Systems**

Certification processes under SI 5 promote traceability and transparency in food production and processing chains, aligning with Codex (CAC/GL 60-2006).

The Regulations also concern periodic inspections, (voluntary) sanitary certificate for food, records and annual reports to be kept by the Food Standards Advisory Board, HACCP and FAO Good Manufacturing Practices, a safety and quality rating system and water quality monitoring.

#### **Includes Preventive Measures Focus**

Moves from "reaction to outbreaks" toward preventive food safety measures, matching global shift after the adoption of FSMS internationally.

#### Incorporates Consumer Health Protection

The ultimate goal of SI 5 (protecting consumer health) mirrors Codex's primary objective.

### Adopts clear compliance and enforcement mechanisms

Establishes compliance procedures, penalties, and enforcement, critical for ensuring effective food safety systems.

#### **Incudes International Trade Facilitation**

Enshrines certification and inspection standards that facilitate acceptance of Zimbabwean food products in international trade, supporting WTO SPS Agreement principles.

#### **Includes Training and Competence of Inspectors**

Emphasizes the need for properly trained and competent inspectors which is critical for an effective food control system per Codex guidance.













## Food and Food Standards (Inspection and Certification) Regulations (S.I. No. 5 of 2015)

Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
Food and Food Standards (Inspection and Certification) Regulations of 2015 SI 5 of 2015	No legal provision for recognition of equivalence in inspection and certification systems from trading partners (Codex GL 26-1997).      Best Practice Gap: Most countries recognize equivalent foreign food control systems to ease trade and reduce duplication.	Amend SI 5 to include procedures for recognizing equivalent foreign inspection/certification systems, and create bilateral/multilateral protocols under WTO-SPS principles.  Include guidelines defining criteria, application procedures, and audit processes for equivalence recognition.
	2. Weak risk-based inspection model – the regulation mentions "risk" but lacks criteria or risk-ranking methodology (Codex GL 26-1997).  Best Practice Gap: Modern systems use data-driven, risk-based models to allocate inspection frequency and depth.	Develop formal risk categorization tools (based on product type, hazard, operator history) and embed them into the inspection decision-making process.  Mandate the training of inspectors on risk analysis and publish risk-based SOPs for consistent application.
	3. Inspector qualification and training requirements are absent – no standards for education, continuous learning, or certification (Codex GL 27-1997).  Best Practice Gap: Global best practice requires competency frameworks, regular training, and licensing for inspectors.	Introduce a national inspector qualification framework; define core competencies, training modules, and minimum standards for inspection personnel.  Require mandatory refresher training every 2–3 years and partner with academia/training institutes for delivery.
	4. Lack of standardized procedures for issuing food certificates – Codex emphasizes clarity, verification steps, and integrity (GL 26-1997).  Best Practice Gap: Countries use structured, auditable certificate templates, clear eligibility rules, and digital controls.	Standardize all certification templates and procedures, and ensure clear guidelines on eligibility, validity, and renewal processes.  Require document traceability and verification layers (e.g., inspector signoff, reference numbers, QR codes).
	5. No regulation or oversight of third-party certification bodies – Codex permits their use under competent authority control.  Best Practice Gap: Globally, GFSI-recognized third-party schemes help reduce government inspection burdens.	Introduce legal provisions recognizing accredited third-party certifiers, with guidelines on scope, monitoring, and revocation of approvals.  Establish an approval registry and conduct regular performance audits on third-party certifiers.







Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
	6. No public access to inspection/ certification results or ratings – Codex promotes transparency and accountability.  Best Practice Gap: Many countries publish inspection scores, issue certificates online,	Mandate the development of a public portal or dashboard showing compliant operators, certified products, inspection reports, and alerts.
	and notify the public of non-compliance.	Make publication mandatory for high-risk premises and certified food producers.



## Food Fortification Regulations of 2016

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food Fortification Regulations, 2016 SI 120 of 2016	<b>Regulations, 2016</b> discipline of food fortification of the following food products: edible	Strong Alignment  SI incorporates the scientific basis and public health need – Full Alignment The regulations are based on national data and WHO/Codex criteria for targeting micronutrient deficiencies.  SI includes Selection of food vehicles for food fortification – Fully Aligned
		Fortification of staples like maize meal, wheat flour, sugar, and salt aligns with global and Codex-recommended vehicles.  SI includes micronutrient levels and forms
	The Regulations refer to Zimbabwe food fortification standards for each product to identify requirements. According to the SI Food fortificants and premixes, shall be chosen among those approved by the Secretary of Health and Child Care.  Furthermore, the Regulations provide for labeling, transport, storage and display of fortified food. Penalties and inspection are also considered.	on food fortification – Largely Aligned Levels are generally within Codex guidance ranges and use approved forms of micronutrients.
		SI adopts principles on mandatory nature of fortification – Fully Aligned Codex permits mandatory fortification where justified by public health needs, as
		done in Zimbabwe.  SI incorporates the use of quality- assured premixes – Full Alignment Use of approved suppliers as highlighted in the SI for premixes aligns with Codex recommendations.









## Food Fortification Regulations of 2016

Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
Food Fortification Regulations, 2016 SI 120 of 2016	1.Codex Fortification Standard/Core Principle  CAC/GL 9-1987, Para 43–46: Fortified food programs should include post-market monitoring of both compliance (food-level) and nutritional impact (population-level).  Gap: SI 120 lacks provisions for post-market surveillance or evaluation of the public health impact.  Global best practice: includes national biomarker surveys, random product sampling, and consumption monitoring.	Incorporate provisions in the SI that establish a fortification national monitoring system with compliance sampling and population-based nutrition assessments (e.g. DHS/MICS).
	2. Codex Fortification Standard/Core Principle  CAC/GL 9-1987, Para 21–24: Micronutrients used for fortification must be highly bioavailable and stable under local food processing conditions.  Gap: SI does not incorporate requirement that nutrient forms used (e.g., iron, vitamin A) meet Codex bioavailability and stability standards.  Global best practice: Best practice recommends NaFeEDTA (sodium iron), encapsulated vitamin A, or other stable, tested forms depending on food vehicle.	Amend and Update regulations to mandate use of Codex-approved, bioavailable micronutrient compounds, with technical guidance for industry.
	3. Codex Fortification Standard/Core Principle  Codex STAN 1-1985 & CAC/GL 9-1987, Para 47–50: Fortified products must have clear labeling, including the name of nutrient(s) added and % of recommended daily intake (NRV).  Gap: SI 120 only requires the word "fortified" without specifying nutrient types, levels, or %NRV.  Global best practice: Global best practices call for transparent, consumer-friendly labeling showing nutrient type, quantity, and health benefit	Amend SI to align with Codex STAN 1-1985: require labels to display micronutrient content, NRV%, and nutrient source.









Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	4. Codex Fortification Standard/Core Principle  CAC/GL 9-1987, Para 40–42: Regulations should mandate industry-level quality assurance and control procedures for fortification.  Gap: The SI does not clearly require manufacturers to maintain QA/QC systems during premix addition, mixing, or processing.  Global best practice: Leading fortification programs mandate internal QA systems, spot-checking, and documentation at each production stage.	Introduce within the SI provisions for mandatory QA/QC protocols, including validation of premix mixing and retention tests across batches.
	5. Codex Fortification Standard/Core Principle  CAC/GL 9-1987, Para 10, 38: Regulatory levels and food vehicles should be reviewed periodically in light of new evidence and health needs  Gap: SI 120 lacks provisions for reviewing nutrient levels or eligible food vehicles over time.  Global best practice: Global frameworks conduct 3–5 year reviews to adapt to changing health data and technological advances.	Amend SI and Insert a provision for mandatory review every 3–5 years by a technical advisory committee including public health experts.
	6. Codex Fortification Standard/Core Principle  CAC/GL 9-1987, Para 42: Premix must be verified and monitored for composition and quality at the source.  Gap: SI 120 requires premix registration but does not enforce traceability or verification of source, quality, or certification.  Global best practice: Best practice promotes supplier verification, batch traceability, and testing of premix composition before use.	Include within the SI a requirement for premix traceability, batch-level documentation, and only using suppliers with certified quality standards.
	7. Codex Fortification Standard/Core Principle  CAC/GL 9-1987, Para 51: Public education is essential to promote awareness and ensure acceptance of fortified foods.	Amend and incorporate provisions that mandate consumer awareness campaigns coordinated by government, producers, and health partners to improve public uptake.







Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	Gap: SI 120 does not mandate consumer education or awareness efforts by industry or government.	
	Global best practice: Global strategies include school programs, mass media campaigns, and social behavior change initiatives for fortified foods.	
	8. Codex Fortification Standard/Core Principle  Codex General Principles of Food Hygiene (CAC/RCP 1-1969): Fortification should be integrated into a broader food safety and hygiene system.	Revise regulation to require HACCP integration of fortification points, particularly where premix is added or heat stability is critical.
	Gap: SI 120 does not explicitly link fortification with food safety plans or HACCP systems.  Global best practice: Global best practice embeds fortification into HACCP and food safety management from raw materials to final product.	
	9. Codex Fortification Standard/Core Principle  Codex General Principles of Food Hygiene (CAC/RCP 1-1969): Fortification should be integrated into a broader food safety and hygiene system.	Amend regulation to require HACCP integration of fortification points, particularly where premix is added or heat stability is critical.
	Gap: SI 120 does not explicitly link fortification with food safety plans or HACCP systems.	
	Global best practice: Global best practice embeds fortification into HACCP and food safety management from raw materials to final product.	











## Food and Food Standards (Food Labelling) Regulations, 2002

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards (Food Labelling) Regulations, 2002	Regulation governing food labelling, nutrient and energy declaration.	Strong Alignment  SI mandates "Best Before" or "Use By" date depending on product type. This complies with Codex date
SI 265 of 2002		marking principles and terminology, under Codex STAN 1-1985, Section 4.7.
		SI prohibits false or misleading labels or health claims not supported by evidence. Regulation matches Codex in prohibiting misleading descriptions and claims in line with Codex STAN 1-1985, Section 3.
		SI requires storage and usage instructions where necessary. Aligns with Codex recommendations to protect consumer safety and ensure proper use under Codex STAN 1-1985, Section 4.6.
		SI requires country of origin where failure to declare may mislead consumers. This matches Codex guidance on conditional country-of-origin labelling. Under Codex STAN 1-1985, Section 4.5.
		The SI/regulation mirrors the Codex requirement for transparency and accuracy in naming food products. The name must be clearly stated and not misleading according to Codex STAN 1-1985, Section 4.1.
		SI mandates a declaration of ingredients in descending order by weight which is fully consistent with Codex on ingredient listing and order. According to Codex all ingredients must be listed in descending order of weight (Codex STAN 1-1985, Section 4.2).
		SI requires the net contents or weight in metric units to be declared and this fully aligns with Codex in specifying net weight or volume using internationally recognized units. Codex states that net contents and drained weight must be declared using metric units (Codex STAN 1-1985, Section 4.3).
		SI requires name and address of the manufacturer, packer, or distributor, consistent with Codex to support traceability and accountability according to Codex STAN 1-1985, Section 4.4.











#### Food and Food Standards (Food Labelling) Regulations, 2002

Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
Food and Food Standards (Food Labelling) Regulations SI 265 of 2002	1.Codex Fortification Standard/Core Principle  Nutrition Labelling: CAC/GL 2-1985, Revised 2011: Mandates nutrition labelling when nutrition or health claims are made. Highlights that nutrition information should cover energy, protein, fat, carbohydrate, and sodium.  Gap: SI does not make nutrition labelling mandatory unless the product makes a nutrition claim.  Global best practice: Many countries (e.g., EU, USA, Australia) now mandate nutrition labelling on nearly all prepackaged foods, even without claims, to promote informed consumer choices and public health.	Amend SI and incorporate provisions requiring mandatory nutrition labelling on all prepackaged foods, not just those with claims, following global practice.
	2. Codex Fortification Standard/Core Principle  Allergen Labelling: Codex Stan 1-1985, Section 4.2.1.4: Highlights mandatory declaration of significant allergens (cereals with gluten, crustaceans, eggs, fish, peanuts, soybeans, milk, tree nuts).  Gap: SI does not have clear requirement to declare common food allergens.  Global best practice: Countries like the EU, USA, Australia require clear, often bolded or boxed allergen labelling and, in some cases, precautionary "may contain" statements.	Include within the SI mandatory allergen declarations aligned with Codex, and consider clear formatting rules (bold, separate box) following global trends.
	3. Codex Fortification Standard/Core Principle  Date marking and storage conditions: Codex Stan 1-1985, Section 4.7: Requires "date of minimum durability" or "use by" date, with clear meaning and format and that storage instructions must be provided if needed for durability.  Gap: SI incorporates general date marking provisions, but has no clear definitions of "best before," "use by," or storage instructions.	Amend SI and harmonize date definitions with Codex and adopt detailed, enforceable date and storage labelling rules.







Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	Global best practice: International jurisdictions like provide precise rules and definitions for date labelling formats, storage temperatures, and handling instructions, reducing food waste and improving safety.	
	4. Codex Fortification Standard/Core Principle  Legibility and Presentation: Codex Standard (Codex Stan 1-1985, Section 8): Requires labelling to be clear, prominent, and easy to read, but does not prescribe minimum font size or specific design standards.	Amend SI and Include minimum font size, contrast, and layout rules to improve label legibility.
	Gap: SI has no specific requirements on legibility, font size, contrast, or placement.  Global best practice: Some countries (e.g., EU Regulation 1169/2011, Australia) require minimum font sizes, contrast requirements, and prominent placement for critical info like expiry dates and allergens.	
	5. Codex Fortification Standard/Core Principle  Labelling for special dietary uses: Various Codex standards, e.g., for infant formula, gluten-free foods: Require provision for product-specific labelling standards for special dietary uses.	Incorporate specific labelling rules for dietary-use products within the SI referencing relevant Codex standards and applying additional consumer protection measures.
	Gap: SI does not encompass detailed rules for special dietary products (e.g., infant formula, gluten-free foods).	
	Global best practice: Globally countries impose detailed, product-specific labelling including mandatory preparation, storage, and warning statements.	







#### **Fish Products**



#### Food and Food Standards (Fish And Fish Products) Regulations, 1990 (S.I. No. 104 of 1990)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards (Fish And Fish Products) Regulations, 1990 (S.I. No. 104 of 1990)	These Regulations prescribe standards for fish and fish products, i.e. fish parts used for human consumption, with or without salt or seasoning and flesh of crustaceans, molluscs, other marine invertebrates, marine mammals and marine reptiles, with or without salt or seasoning.	Partial Alignment
	These Regulations apply to all fish and fish products which are sold or manufactured for sale in Zimbabwe and highlight that no person shall sell, import for sale or manufacture for sale any fish or fish products other than in terms of these Regulations.	
	Fish and fish products may be placed on the market with food additives and preservatives as permitted by the Food and Food Standards (Preservatives, Additives and Prohibited Substances) Regulations 1972 but shall be labelled accordingly.	
		SI aligns with Codex General Principles of Food Hygiene, Section 4 that defines establishment design, facilities, and hygiene of personnel and Codex Code of Practice, Section 5 that focuses on good manufacturing practices (GMP) and sanitation.
		SI requires that fish handlers follow sanitary practices and that premises for fish processing meet hygiene standards.
		SI aligns with Codex Code of Practice for Fish and Fishery Products, Section 3.1 which emphasizes definitions, scope, and ensuring product identity and integrity.
		SI defines "fish" and "fish products," and specifies they must be wholesome, properly cleaned, and free from contamination.











#### Food and Food Standards (Fish And Fish Products) Regulations, 1990 (S.I. No. 104 of 1990)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
		SI aligns with Codex General Standard for Food Additives (Codex Stan 192-1995) that allows only approved additives and Codex Code of Practice, Section 8 that requires control over chemical hazards, including residues, contaminants, and additives.
		SI limits use of preservatives and prohibits sale of fish containing harmful or unauthorized substances.
		SI aligns with Codex General Standard for the Labelling of Prepackaged Foods (Codex Stan 1-1985) that requires product name, date marking, storage instructions, and lot identification and Codex Code of Practice, Section 3.3 that stresses accurate and informative labelling.
		SI requires labels to include the name of the fish product, packing date, and storage instructions.
		SI aligns with Codex and or core principles on Food Hygiene that require clean handling, prevention of contamination, and good hygiene practices throughout the supply chain and Codex Code of Practice for Fish and Fishery Products, Section 3.2 which focuses on handling, storage, and transport under hygienic conditions.
		The SI requires fish and fish products to be clean, free from extraneous matter, and handled under hygienic conditions during preparation and sale.
		SI aligns with •Codex Code of Practice, Section 7.3 which requires temperature control (e.g., chilling, freezing) to maintain safety and quality and Codex General Principles, Section 7 that emphasizes temperature as a key control factor to prevent hazards.









Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
		SI requires fish to be kept at a temperature preventing spoilage (usually chilled or frozen) and stored to minimize bacterial growth.
		SI aligns with Codex Code of Practice, Section 3.1 that requires products to be fit for human consumption and free from spoilage or unacceptable defects and Codex General Principles, Section 9 that focuses on control of non-conforming product and removal from the food chain.
		SI prohibits sale of fish that is unwholesome, decomposed, or otherwise unfit for human consumption.

#### Food and Food Standards (Fish And Fish Products) Regulations, 1990 (S.I. No. 104 of 1990)

Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
Food and Food Standards (Fish And Fish Products) Regulations, 1990 (S.I. No. 104 of 1990)	Outdated Food Safety Management Framework: Codex General Principles of Food Hygiene (CXC 1-1969, Rev. 2020) advocate for HACCP-based food safety systems in all stages of food production.  Gap: S.I. 104 of 1990 does not mandate modern food safety systems such as HACCP (Hazard Analysis and Critical Control Points), which are essential for managing risks in fish production and processing.  Global best practice: Most countries (e.g., EU member states, the US FDA under the Fish and Fishery Products Hazards and Controls Guidance) require HACCP implementation in fish processing plants as a legal obligation.	Amend S.I. 104 of 1990 to mandate HACCP-based food safety systems for all fish and fish product processing establishments to align with Codex and international trade requirements.
	2. Codex Standard/Core Principle  Limited Product Categorization and Specifications: Codex Standards for Individual Fish Products (e.g., CXS 94-1981 for canned sardines and sardine-type products)	Update S.I. 104 of 1990 by incorporating product-specific standards and aligning with Codex and SADC harmonized fish standards to ensure consistency, safety, and trade facilitation.









Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	specify requirements for composition, contaminants, labelling, and hygiene.	
	Gap: The regulation provides broad categories for fish and fish products without detailed standards for specific products like canned fish, dried fish, smoked fish, or fish fillets.	
	Global best practice: The SADC has developed harmonized fish product standards for 11 specific products (e.g., frozen fish, fish fingers, dried and smoked fish), which countries like Namibia and Zambia are already integrating.	
	3. Codex Standard/Core Principle  Absence of Fortification Provisions: Codex Guidelines on Food Fortification (CAC/GL 9-1987, Rev. 2021) recommend fortification of foods as a strategy to prevent and correct nutritional deficiencies.	Integrate fortification guidelines in the fish standards regulation, in line with Codex and SADC, to encourage the production of fortified fish products as part of national nutrition strategies.
	Gap: There are no provisions in the SI for the fortification of fish products with essential nutrients (e.g., Omega-3, Vitamin D, or iodine), despite their potential to combat micronutrient deficiencies.	
	Global best practice: SADC Minimum Standards on Food Fortification provide a framework for nutrient addition, and countries like South Africa and Nigeria mandate fortification in key food items.	
	4. Codex Standard/Core Principle  Inadequate Labelling Requirements: General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) requires clear product identification, ingredient listing, net weight, country of origin, and expiry dates.	Revise labelling provisions to comply with Codex labelling standards and international models, ensuring transparency and safety for consumers.
	Gap: The regulation lacks specific labelling standards, such as date of production, nutritional information, allergens, and storage instructions for fish products.	









Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	Global best practice: The EU Regulation (EU) No 1169/2011 on food information to consumers mandates detailed labelling including allergens, nutrition, and traceability for all fishery products.	
	5. Codex Standard/Core Principle  Lack of Provisions for Environmental and Sustainability Standards: Code of Conduct for Responsible Fisheries (FAO, 1995) and Codex Code of Practice for Fish and Fishery Products (CXC 52-2003) encourage sustainability and traceability in the fish value chain.  Gap: The SI has no regulatory provisions linking fish product standards to sustainable fishing practices or traceability systems.  Global best practice: Countries now adopt	Incorporate sustainability and traceability requirements in the regulation to ensure responsible sourcing and improve access to ecoconscious export markets.
	sustainability labelling (e.g., MSC certification), mandatory catch documentation schemes (CDS), and traceability for fish products.	
	6. Codex Standard/Core Principle  Misalignment with International Trade Requirements: Codex sets international food safety limits for contaminants, heavy metals (e.g., CXS 193-1995), and biotoxins relevant to fish.	Amend and align SI with Codex and WTO SPS requirements, including MRLs and biotoxin thresholds, to ensure compliance with international market access conditions.
	Gap: The SI is not aligned with key requirements for fish export such as sanitary certificates, maximum residue limits (MRLs), and biotoxin standards.	
	Global best practice: Exporting countries integrate Codex-based MRLs and align with WTO SPS Agreement obligations to access international markets.	











#### **Poultry**



Food and Food Standards (Poultry, Poultry Meat and Poultry Products) Regulations, 1990 (S.I. No. 103 of 1990)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards (Poultry, Poultry Meat and Poultry Products)	These Regulations prescribe standards for any poultry, i.e. any bird that is commonly used for food and poultry products.	Partial to Moderate
Regulations, 1990 S.I. No. 103 of 1990	They apply to all poultry, poultry meat and poultry products which are sold or manufactured for sale in Zimbabwe.	
	Restrict selling, importation for sale or manufacturing for sale any poultry, poultry meat or poultry products other than in terms of these Regulations (reg. 2).	
	The standards prescribed regard ingredients and use of additives and preservatives, treatment of food, intrinsic qualities and labelling.	
	Regulation 4 prohibits use of exogenous oestrogenic substances and sale of products containing use of exogenous oestrogenic substances. The same regulation defines adulterated poultry meat, poultry meat products or preparations thereof.	
		Recognition of Definitions for Poultry and Poultry Products S.I. defines "poultry", "poultry meat", and "poultry products" (e.g., frozen poultry, processed poultry), establishing a clear scope for regulatory coverage.
		Codex Code of Hygienic Practice for Meat (CXC 58-2005) <i>and</i> Codex Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011) also define and distinguish poultry and poultry meat types, supporting clear terminology.









Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
		Inclusion of Basic Quality and Grading Provisions The S.I includes minimum quality requirements such as the condition of the meat, absence of bruising or deformities, and acceptable appearance.
		Codex Standard for Poultry Meat (CXS 102-1981) outlines physical and sensory quality standards including cleanliness, absence of feathers, and no discoloration similar to Zimbabwe's provisions within the S.I.
		Basic Labelling Requirements The regulation requires labelling of poultry products, including name, weight, and origin. Supports traceability and consumer information, a core Codex value.
		Codex General Standard for Labelling of Prepackaged Foods (CXS 1-1985) includes similar labelling elements, although more detailed.
		Hygiene Requirements for Handling and Processing Although basic, the SI requires hygienic conditions in poultry processing facilities and during transport.
		Codex Code of Hygienic Practice for Meat (CXC 58-2005) emphasizes hygiene throughout the supply chain from slaughtering to packaging.
		Specification on Additives and Use of Preservatives The regulation limits or prohibits the use of certain preservatives and additives in poultry products.
		Codex General Standard for Food Additives (CXS 192-1995) outlines approved food additives and their limits for meat products, aligning with this control.
		Prohibition of Contaminated or Spoiled Products S.I. 103 of 1990 prohibits the sale or distribution of poultry meat that is spoiled,









Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
		contaminated, or unfit for human consumption.
		General Principles of Food Hygiene (CXC 1-1969, Rev. 2020) mandates that food must be free from spoilage, physical, chemical, or biological contamination.
		Freezing and Storage Temperature Requirements The SI includes temperature guidelines for the handling and freezing of poultry, helping prevent microbial growth.
		Code of Hygienic Practice for Meat (CXC 58-2005) and Code of Hygienic Practice for Frozen Foods (CXC 8-1976) set similar freezing and cold chain standards for poultry meat.

#### Food and Food Standards (Poultry, Poultry Meat and Poultry Products) Regulations, 1990 (S.I. No. 103 of 1990)

Food and Food Standards (Poultry, Poultry Meat and Poultry Products) Regulations, 1990  S.I. No. 103 of 1990  1. Codex Standard/Core Principle  Absence of HACCP-Based Food Safety Systems: General Principles of Food Hygiene (CXC 1-1969, Rev. 2020) – introduce Hazard Analysis and Critical Control Points (HACCP) as a fundamental approach to food safety.  Gap: The regulation does not mandate or mention HACCP or any structured food safety risk management system.  Global best practice: The EU and many Southiers (e.g., USA, Ganada, South Africa)	Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
require HACCP implementation in all poultry and meat processing facilities.	Standards (Poultry, Poultry Meat and Poultry Products) Regulations, 1990	Absence of HACCP-Based Food Safety Systems: General Principles of Food Hygiene (CXC 1-1969, Rev. 2020) – introduce Hazard Analysis and Critical Control Points (HACCP) as a fundamental approach to food safety.  Gap: The regulation does not mandate or mention HACCP or any structured food safety risk management system.  Global best practice: The EU and many countries (e.g., USA, Canada, South Africa) require HACCP implementation in all poultry	mandatory HACCP systems for poultry production and processing, including training and









Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses Recommendations	
	2. Codex Standard/Core Principle  No Defined Microbiological Criteria: Guidelines for the Validation of Food Safety Control Measures (CXG 69-2008) and microbiological criteria outlined in Codex food hygiene texts.	Include microbiological criteria for poultry and poultry products in line with Codex and WHO/FAO guidance, and require routine testing and reporting.
	Gap: Within the S.I. there are no specific microbiological limits for common poultry-related pathogens such as Salmonella spp., Campylobacter spp., or Listeria monocytogenes.	
	Global best practice: Codex and national regulations (e.g., EFSA, FSIS) prescribe acceptable microbial loads in raw and processed poultry to prevent outbreaks.	
	3. Codex Standard/Core Principle  No Animal Welfare or Humane Slaughter Provisions: While Codex itself defers to the OIE Terrestrial Animal Health Code, it encourages humane treatment of animals as part of meat hygiene.	Incorporate minimum animal welfare standards into poultry regulations, referencing OIE guidelines, especially for slaughter and transport.
	Gap: S.I. has no requirement for humane handling, transport, or slaughter of poultry.  Global best practice: OIE standards, EU Regulation EC 1099/2009, and the USDA Poultry Products Inspection Act include	
	mandatory humane slaughter protocols.  4. Codex Standard/Core Principle	Introduce traceability obligations
	No Traceability or Batch Identification System: Codex Guidelines for Traceability/ Product Tracing (CXG 60-2006).	within the SI for all poultry producers and processors, including batch coding, digital records, and recall procedures.
	Gap: Within the SI there is no requirement for record-keeping, traceability, or batch identification throughout the supply chain.	
	Global best practice: Countries like the EU require poultry products to be fully traceable from farm to fork, enabling recalls and enforcement.	









Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	5. Codex Standard/Core Principle  No Standards for Processed or Value-Added Poultry Products	Expand the scope of the regulation to include <b>standards for processed poultry products</b> , including hygiene, additives, and labelling.
	Gap: S.I. focuses mainly on raw poultry meat; there is no guidance on processed items like sausages, nuggets, or ready-to-eat products.	
	Global best practice: Most food standards bodies differentiate between raw and processed products with tailored requirements.	

### Cereals, Pasta, and Grain



Food and Food Standards (Flour, Bread and Cereals) Regulations, 1972 (S.I. No. 1211 of 1972)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards (Flour, Bread and Cereals)	These Regulations prescribe compositional standards for flour, bread, rice, maize-meal, maize samp, mealie-rice and diet foods.	Partial Alignment SI encompasses Clear Definitions of Products (Flour, Bread, Cereals)
Regulations, 1972 (S.I. No. 1211 of 1972)	They apply only to flour, bread and cereals which are sold or intended to be sold in Zimbabwe.  Contains rules regarding the labelling of food to which these Regulations apply.  Provide standards for the various products to which the Regulations apply.  Prescribes standards for Mycotoxin content.  As a general rule, it prohibits, import for sale or manufacture products that do not meet the standards prescribed.  The Schedule within the SI sets out additional standards for flour and bread.	The regulation clearly defines products such as wheat flour, maize meal, white bread, and brown bread providing a solid foundation for regulatory control.  Aligned with: Codex Standard for Wheat Flour (CXS 152-1985), Codex Standard for Maize Meal and Maize Flour (CXS 154-1985) and Codex Standard for Cereal-Based Foods (CXS 074-1981).  Product identity and compositional criteria are essential for conformity and food safety monitoring and the Zimbabwe SI provides similar foundational clarity.









Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
		SI includes Moisture and Ash Content Specifications
		The regulation sets limits for <i>moisture content and</i> ash content in flour and cereal products, which are important indicators of quality and shelf-life.
		Consistent with: CXS 152-1985 and CXS 154-1985, which specify permissible ranges for moisture and ash.
		Includes Restrictions on Adulteration and Contaminants
		The SI prohibits the sale of flour, bread, or cereals containing foreign matter, insect damage, or any substance unfit for human consumption.
		Aligns with: General Principles of Food Hygiene (CXC 1-1969, Rev. 2020) and General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995).
		<b>SI</b> has provisions ensure product integrity and protect public health, echoing Codex's emphasis on hygiene and contaminant control.
		SI includes Standards for Baking and Finished Product Quality (Bread)
		The regulation outlines expected characteristics of bread texture, moisture, crust, colour ensuring a minimum level of consumer acceptability.
		While Codex does not have a standalone bread standard, this aligns with general product quality expectations under:  Codex Guidelines on Nutrition Labelling (CXG 2-1985) and Regional and national food standards (e.g., East African Bread Standards).
		Includes Limitations on Additives
		The SI restricts certain bleaching agents, preservatives, and colourants in flour and bread, ensuring that only approved substances are used.
		Aligns with: Codex General Standard for Food Additives (CXS 192-1995).











#### Food and Food Standards (Flour, Bread and Cereals) Regulations, 1972 (S.I. No. 1211 of 1972)

Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
Food and Food Standards (Flour, Bread and Cereals) Regulations, 1972 S.I. No. 1211 of 1972	1. Codex Standard/Core Principle  Absence of Mandatory Micronutrient Fortification: Codex Guidelines on Food Fortification with Micronutrients (CAC/GL 9-1987, Rev. 2021) and Codex Standard for Wheat Flour (CXS 152-1985) encourage fortification of flour with nutrients such as iron, zinc, and folic acid.  Gap: The regulation does not require or promote micronutrient fortification of wheat or maize flour, despite widespread micronutrient deficiencies in the region.  Global best practice: Many countries in Africa (e.g., South Africa, Nigeria, Zambia) mandate fortification of flour with iron, folic acid, and other vitamins to combat malnutrition and anaemia.	Amend the SI to include mandatory fortification of flour with key micronutrients, aligned with WHO and Codex guidelines, supported by compliance monitoring and labelling requirements.



#### Food and Food Standards (Pasta Products) Regulations, 1991 (S.I. 149 of 1991)

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards (Pasta Products) Regulations, 1991	These Regulations prescribe standards regarding labelling, shape, size and ingredients of a class of food prepared by drying units of dough prepared from flour and water with or without one or more of the optional ingredients referred to in article 5. Regulation 2 prescribes that these Regulations shall apply to all pasta products which are sold or manufactured for sale in Zimbabwe and that no person shall sell, import or manufacture for sale any of such products otherwise than in terms of these	Strong Alignment  SI allows incorporates clear provisions on enforcement and conformity through testing and inspection by food inspectors.
S.I 49 of 1991		SI aligns with the Codex on pasta composition and quality requirements. It prescribes moisture content, specifies protein content requirements and restrict the inclusion of non-permitted substances or coloring agents.
		SI encompasses strong hygiene requirements, prohibits contamination, and demands clean packaging and handling.
		The SI incorporates clear labelling requirements which ensure the consumer's rights to know regarding the content and the producer.
Regulation.	SI encompasses categories and types of pasts products similar to Codex's naming regulations for product identity.	











#### Food and Food Standards (Pasta Products) Regulations, 1991 (S.I. 149 of 1991)

Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
Food and Food Standards (Pasta Products) Regulations, 1991 (S.I. 149 of 1991)	1. Codex Standard/Core Principle  Outdated Regulatory Framework: Codex encourages periodic review of national food laws to ensure alignment with evolving food science and trade norms (Codex CAC/GL 82-2013).  Gap: The regulation was enacted in 1991 and has not been substantively updated in over three decades. It predates Codex STAN 249-2006 and numerous revisions to Codex food hygiene and labelling standards.  Global best practice: Most jurisdictions update food standards every 5 to 10 years or as needed based on science and trade developments.	Conduct a comprehensive review and update of the regulation.  Reference the latest Codex pasta standard (STAN 249-2006) and incorporate recent international food safety principles.
	2. Codex Standard/Core Principle  Absence of Definitions for New Product Categories (e.g. glutenfree, whole grain pasta): Codex allows for the recognition of diverse pasta products, including nontraditional types, provided their nature is accurately labelled (STAN 249-2006, Section 2.1).  Gap: S.I. 149 of 1991 defines only traditional pasta forms (semolina/wheat-based), excluding modern types such as gluten-free, whole grain, vegetable-fortified, or highfiber pasta.  Global best practice: Countries like the EU and USA recognize multiple categories of pasta, including glutenfree, enriched, and specialty types.	Amend the SI to include definitions and standards for:  Gluten-free pasta Vegetable or legume-based pasta Whole grain or enriched pasta
	3. Codex Standard/Core Principle Inadequate Detail on Additives and Fortification: Codex uses	Provide a <b>clear list of permitted additives</b> , with their maximum allowable levels.







Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	the <b>General Standard for Food Additives (GSFA)</b> , which provides maximum permitted levels and acceptable daily intake (ADI).	
	Gap: The regulation permits or restricts certain additives vaguely, without detailed referencing of permitted lists, maximum levels, or fortification guidelines	
	Global best practice: Countries adopt or align with Codex GSFA and often develop fortification standards for pasta (e.g., iron, folate).	



#### Food and Food Standards (Peanut and Peanut Products) Regulations, 1990 (S.I. No. 99 of 1990

Title of Law/Policy Year of Enactment	Description/Regulatory Focus Area	Codex Alignment/Inclusion of Core Principles
Food and Food Standards (Peanut and Peanut Products) Regulations, 1990 S.I. No. 99 of 1990	These Regulations prescribe standards for peanut and peanut products which are sold or manufactured for sale in Zimbabwe. No person shall sell, import for sale or manufacture for sale peanut or peanut products other than in terms of these Regulations (reg. 2). They mainly prescribe standards for ingredients for peanut butter and prescribe a maximum limit for mycotoxins.	Strong Alignment  SI encompasses prohibitions for the sale of peanut products that are "contaminated with aflatoxins beyond safe limits," and specify maximum allowable limits in accordance with public health recommendations — Aligns with the Codex General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995) sets maximum levels for aflatoxins in peanuts intended for further processing SI includes labelling requirements — Aligning with The Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).
		The SI includes additives and composition provisions in alignment with Codex Standard (Codex STAN 200-1995) which for peanut butter, restricts the use of food additives and mandates minimum peanut content (usually around 90% peanuts by weight).











#### Food and Food Standards (Peanut and Peanut Products) Regulations, 1990 (S.I. No. 99 of 1990

Title of Law/Policy	Identified Gaps/Weaknesses	Recommendations
Year of Enactment		
Food and Food Standards (Peanut and Peanut Products) Regulations, 1990 (S.I. No. 99 of 1990)	1. Codex Standard/Core Principle  CXS 193-1995 (General Standard for Contaminants and Toxins in Food and Feed) that sets specific maximum levels for aflatoxins in peanuts	Update the regulation to include <b>clear aflatoxin thresholds</b> (µg/kg), harmonized with <b>Codex and international trade standards</b> , and strengthen laboratory testing capacity to support compliance.
(S.I. NO. 99 OF 1990)	Gap: S.I. prohibits aflatoxin contamination but does not specify exact maximum limits. This creates regulatory ambiguity and limits enforceability, especially in trade and inspection processes.  Global best practice: Countries like Kenya, South Africa, and the EU have clearly defined legal aflatoxin thresholds aligned with Codex, enabling risk-based food safety enforcement.	
	2. Codex Standard/Core Principle  Codex General Principles of Food Hygiene (CXC 1-1969) and the Code of Hygienic Practice for Groundnuts (CAC/RCP 22-1979) recommend microbiological criteria (e.g., limits on Salmonella, E. coli) in peanut products.  Gap: S.I. does not include microbiological standards for pathogens in peanut or peanut butter products.  Global best practice: The USA (FDA) and EU require peanut butter to be free from Salmonella and meet defined limits for aerobic plate counts and coliforms.	Amend the regulation to adopt Codexaligned microbiological safety criteria, particularly for Salmonella spp., and enforce Good Manufacturing Practices (GMPs) and Hazard Analysis and Critical Control Point (HACCP) systems in peanut processing facilities.
	3. Codex Standard/Core Principle  Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) mandates clear labelling of allergenic ingredients, including peanuts, to protect allergic consumers.	Incorporate a provision requiring <b>clear allergen declarations</b> and precautionary statements on packaging (e.g., "May contain traces of peanuts") in line with Codex and global norms.









Title of Law/Policy Year of Enactment	Identified Gaps/Weaknesses	Recommendations
	Gap: S.I. does not require allergen- specific labelling or warnings for peanut-containing products.  Global best practice: Countries such as Australia, UK, and USA enforce mandatory allergen labelling under food safety laws (e.g., "Contains: Peanuts").	
	4. Codex Standard/Core Principle  While Codex does not yet prescribe limits for trans fats in peanut butter, WHO recommends eliminating industrially produced trans fats by setting regulatory limits.	Introduce provisions to <b>limit trans fat content</b> and require <b>disclosure of added sugars</b> , ensuring peanut products meet evolving global health guidelines.
	Gap: S.I. does not address trans fats or sugar limits, despite peanut butter often containing added oils and sugars.  Global best practice: The WHO REPLACE initiative guides countries to limit trans fats to less than 2 grams per 100 grams of fat in foods.	
	5. Codex Standard/Core Principle  The FAO/WHO Framework for National Food Control Systems emphasizes the need for clear enforcement protocols and sanctions for non-compliance to uphold food safety.	Amend the regulation to include a clear <b>enforcement protocol</b> , designate competent authorities, and define <b>sanctions</b> for non-compliance (e.g., seizure, recalls, fines).
	Gap: S.I. lacks a detailed enforcement, inspection, and penalty framework, relying on general provisions under the Public Health Act.	
	Global best practice: Countries like Rwanda and Botswana have introduced specific enforcement mechanisms for food standards under different laws, with defined roles for regulators, penalties, and recall procedures.	







#### 4.1.1 Ancillary Laws and Policies Supporting Food Governance (Consolidated)

#### The Role of Ancillary Food Laws and Policies in Supporting Food Governance in Zimbabwe

Zimbabwe's food regulatory and governance framework is not confined to the direct provisions of primary laws such as the Food and **Food Standards** Act [Chapter 15:04], but is substantially supported by a network of **ancillary laws and policies** that reinforce the regulation of food systems. These ancillary instruments, while not exclusively tailored to food matters, encompass critical provisions that impact the production, safety, distribution, and access to food. They strengthen the regulatory ecosystem by addressing interconnected factors across various sectors, thereby promoting a more cohesive and robust food governance system.

Key among these ancillary laws is the **Public** Health Act [Chapter 15:17], which plays a foundational role in maintaining hygiene standards across food handling, preparation, and retail environments. It empowers public health authorities to inspect food premises, monitor disease outbreaks, and enforce sanitation requirements, thereby safeguarding public health through safe food practices. The **Environmental** Management Act [Chapter 20:27] supports sustainable food systems by regulating pollution, waste disposal, and the environmental impacts of agricultural activities and businesses. It helps prevent contamination of water sources and soils, which are essential for safe food production. Complementing these is the Consumer Protection Act [Chapter 14:44], which protects consumers against mislabelled, expired, or unsafe food products. It enforces fair trade practices and transparency in food labelling and marketing, thus promoting informed consumer choices and accountability within food supply chains.

Other critical ancillary instruments include the Animal Health Act [Chapter 19:01], which contributes to food safety by regulating the control of animal diseases and protecting public health from zoonotic risks associated with livestock and animal products. The **National Biotechnology** Authority Act [Chapter 14:31] plays a vital role in regulating the safe use of biotechnology, including genetically modified organisms (GMOs), in food and agriculture, ensuring that innovations in food production are guided by strict biosafety standards. The Act regulates the safety aspects of the import, export, manufacture, processing and selling of any products of biotechnology, including substances, foodstuffs and additives containing products of biotechnology.

The **Seeds Act [Chapter 19:13]** plays a critical role in supporting the country's broader food laws, policies, and governance frameworks, including those that shape the Mutare urban food system. By regulating the registration of seed sellers and laboratories, controlling the importation and sale of seeds, and enforcing strict testing, certification, and inspection procedures, the Act ensures that only high-quality, certified seeds enter the food production chain. This directly complements national food policies and standards by safeguarding the integrity and productivity of agricultural systems, which are the foundation of food security and urban food supply. In Mutare, where food-related by-laws seek to strengthen local food governance, the Seed Act underpins these efforts by protecting farmers and urban growers from substandard or falsely advertised seeds that could undermine yields and compromise food availability. Through its emphasis on quality assurance, accountability, and farmer protection, the Act aligns with and reinforces both national regulatory systems and local by-laws, ensuring that food governance in urban areas like Mutare rests on a reliable and sustainable agricultural base.









The Forest Act [Chapter 19:05], the Communal Land Forest Produce Act [Chapter 19:04], and the National Forest Policy collectively provide a legal and policy framework that supports Zimbabwe's primary food laws, standards, and governance systems, including those influencing the Mutare urban food system. These instruments regulate the management, use, and trade of forest resources, ensuring that forest products entering local food markets meet sustainability and quality standards. In Mutare, where forest produce such as wild fruits, mushrooms, and non-timber forest products are sold and consumed, these laws safeguard communities by controlling unsustainable harvesting, regulating commercial exploitation through permits, and promoting sustainable forest management. The National Forest Policy reinforces these Acts by emphasizing biodiversity conservation, community participation, and sustainable use, aligning with national food policies that aim to strengthen food safety, nutrition, and livelihoods. By protecting forests from overexploitation, controlling trade, and supporting co-management approaches, these frameworks ensure that forestderived foods contribute safely and sustainably to urban food systems in Mutare. In this way, forest legislation not only sustains ecosystems but also underpins local food governance by linking environmental protection with food availability, standards, and resilience.

The **Urban Councils Act [Chapter 29:15]** and the Shop Licences Act [Chapter 14:17] empower local authorities to license, monitor, and inspect food vendors, restaurants, supermarkets, butcheries, and other food outlets. These Acts are essential in controlling the quality and hygiene of food sold to the public, by enabling municipalities to issue permits, enforce standards, and sanction noncompliance. Meanwhile, the Factories and Works Act [Chapter 14:08] regulates the registration and

operation of factories, including those engaged in food processing and packaging. It ensures workplace safety, structural suitability, and environmental compliance, thereby reinforcing food safety along the industrial value chain.

Furthermore, the Zimbabwe Agriculture and Rural Development Authority Act [Chapter **18:01**] establishes the Agriculture and Rural Development Authority (ARDA), which oversees the planning, coordination, and implementation of agricultural development projects across the country. ARDA's mandate includes enhancing agricultural productivity, promoting rural development, and managing state farms and joint ventures. Its activities influence food availability, access, and rural food security, making it a key institution in the food systems governance framework.

The Zimbabwe Agriculture Sector Policy, a strategic policy document guiding the agricultural sector, outlines goals and measures for boosting agricultural productivity, food security, value addition, and climate-smart agriculture. It recognizes the centrality of smallholder farmers and the need for inclusive value chains and sustainable land use. By setting a comprehensive roadmap for the agricultural economy, the policy directly influences food production systems, food supply chains, and market access.

The recently adopted **Zimbabwe Agroecology Policy** promotes ecologically sustainable farming practices that enhance biodiversity, soil fertility, resilience to climate change, and farmer empowerment. The policy encourages the use of traditional knowledge systems, organic inputs, and farmer-led innovations, with an emphasis on environmental and social justice. Its implications for food governance are profound as it promotes diversified, nutritious, and locally









appropriate food systems, while reinforcing sustainability, food sovereignty, and reduced reliance on synthetic chemicals and imported inputs. Lastly, national frameworks such as the **National Nutrition Strategy** and the **Zimbabwe Climate Policy** intersect with food governance by addressing food security, dietary quality, resilience to climate shocks, and sustainable agricultural practices.

Collectively, these ancillary laws and policies create an enabling and holistic legal and policy environment that supports food governance objectives. Their effective implementation and alignment with primary food legislation are crucial for ensuring an integrated, efficient, and sustainable food regulatory framework in Zimbabwe.

# 4.2 INTERNATIONAL AND REGIONAL INSTRUMENTS INFLUENCING FOOD SYSTEMS GOVERNANCE

## International and Regional Instruments Influencing Food Systems Governance in Zimbabwe

Zimbabwe's food systems governance is not only shaped by domestic laws and policies but is also influenced by a range of international and regional instruments. These frameworks though not authoritative they provide guidance, obligations, and policy direction that inform Zimbabwe's national strategies, legal reforms, and institutional practices across the food system.









Instrument	Туре	Influce on Zimbabwean Food Systems Governance
Codex Alimentarius (FAO/WHO)	International Standards	Provides food safety and quality standards used to guide national food regulations, especially on food hygiene, contaminants, and labelling.
WTO Agreements (SPS & TBT)	International Agreements	Promote science-based food safety regulations and prevent trade barriers through sanitary, phytosanitary, and technical measures.
Comprehensive Africa Agriculture Development Programme (CAADP)	Regional Policy (AU)	Shapes agricultural planning and investment strategies aligned with food security and resilience goals.
Malabo Declaration (2014)	Regional Political Commitment	Drives national commitments to end hunger, enhance agricultural productivity, and improve nutrition.
Sustainable Development Goals (SDGs)	Global Development Framework	Influences national food and nutrition policies, especially SDG 2 (Zero Hunger) and SDG 12 (Sustainable Consumption and Production).
Convention on Biological Diversity (CBD) & Kunming- Montreal Global Biodiversity Framework (GBF)	International Convention & Framework	Promotes sustainable agriculture, agrobiodiversity conservation, and ecosystem-based food production models.
Africa Regional Nutrition Strategy (ARNS)	Regional Policy (AU)	Guides national nutrition action plans, including dietary diversity, micronutrient fortification, and child health initiatives.
SADC Regional Agricultural Policy (RAP)	Regional Framework	Supports harmonized food trade, regional food security, and coordinated agricultural responses in the region.
International Plant Protection Convention (IPPC)	International Treaty	Regulates phytosanitary measures to prevent the spread of plant pests affecting crops and food safety.
International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGRFA)	International Treaty	Promotes conservation and sustainable use of crop genetic diversity essential for food security.
Global Plan of Action for Animal Genetic Resources (FAO)	Global Action Plan	Guides conservation and sustainable use of livestock genetic diversity, enhancing resilience of food systems.
UNFCCC & Paris Agreement	Global Climate Agreement	Shapes Zimbabwe's climate-smart agriculture, drought preparedness, and food system adaptation strategies through NDCs.







Zimbabwe's food systems governance is intricately connected to a broad array of international and regional instruments that inform and influence national policies, legal reforms, and regulatory practices. These frameworks serve as benchmarks, **obligations, and guiding principles** that promote harmonization with global standards, foster sustainability, and support inclusive and resilient food systems. From trade and biotechnology to biodiversity conservation and climate resilience, these instruments collectively shape how Zimbabwe navigates complex food governance challenges. As the country seeks to transform its food systems, leveraging these international and regional commitments is essential to advancing national food security, safety, nutrition, and environmental sustainability goals.

# 4.2.1 Breaking Down Food Laws, Policies and Safety Standards for Mutare (By-Laws)

Within the broader context of analyzing food laws and policies in Zimbabwe, it's crucial to examine the specific regulatory landscape at the local level. In this vein, the study recognized that Mutare presents its own distinct set of practices within its food regulatory system. Therefore, a detailed review of Mutare's bylaws was undertaken to identify any existing regulations and specific policies directly pertaining to the food system within the city.

#### The Mutare Urban Food-Related By-Laws

The City of Mutare has developed a set of primary food-related by-laws as well as ancillary food related by-laws that collectively shape the functioning of its food systems and the supporting regulatory frameworks. The direct food by-laws focus on areas such as food safety, hygiene standards in food markets, licensing of food vendors, and regulation of food handling and processing facilities, all of which are critical in

protecting public health and ensuring consumer confidence. The indirect by-laws, on the other hand, influence food systems through urban planning, waste management, environmental health, and land use regulations that determine where and how food can be produced, traded, and consumed within the city.

At the time of this compilation, many of these bylaws were relatively new, with most still in draft form pending review, approval by the Ministry of Local Government, and subsequent gazettement before they could be legally enforceable. This transitional state has important implications for Mutare's urban food governance, as the effectiveness of these by-laws in addressing emerging challenges such as informal food vending, urban agriculture, food safety risks, and nutrition security depends on their timely approval, harmonization with national food laws and policies, and alignment with international food safety and trade standards. Strengthening these bylaws and ensuring their enforcement will be central to building a resilient, safe, and inclusive urban food system in Mutare.

## The By-Laws in Detail (Primary and Ancillary Food By-Laws)

The City of Mutare has developed a range of by-laws that directly and indirectly shape the urban food system. These include the City of Mutare (Food Hygiene) By-laws, (Game Meat) By-laws, (Hawkers and Vendors) By-laws, (Urban Agriculture) By-laws, (Control of Livestock) By-laws, (Control of Ownership in Open Spaces) By-laws, (Registration and Licensed Premises) By-laws, and (Environmental and Natural Resources Conservation) By-laws. Together, these regulatory instruments govern key aspects of food safety, production, trade, and environmental sustainability within the city.

The City of Mutare (Food Hygiene) by-laws encompass provisions on the prohibition against









the sale or storage of food in unsuitable premises, as well as provisions on the cleanliness of premises and the storage of food being sold, prepared, manufactured, or handled. The by-laws also make it mandatory for food handlers to notify infectious diseases and highlight the application registration procedure for individuals to become certified food handlers. The second schedule of the by-laws lists the offences and penalties recognized under the by-laws.

City of Mutare (Game Meat) by-laws regulate the selling of game meat within the City of Mutare. The laws mandate the inspection of the game meat before it's sold to the public and the notification of intention to sell the meat to authorities. The laws also encompass license, registration, and inspection fees within the first schedule, and the second schedule encompasses the offences and penalties.

**City of Mutare (Urban Agriculture) by-laws** regulate the allocation of land for urban agriculture, procedures for permit applications to undertake urban agriculture and highlights the penalties and offences applying under the first schedule and second schedule.

City of Mutare (Hawkers and Vendors) by-laws regulate the operations of hawkers and traders in Mutare Urban. The laws regulate market trading spaces, including trading permits and licenses procedures, inspections, and requirements for health medical certificates. Additionally, the laws also regulate hygiene and food safety, removal of waste, seizure of goods, and disposal of unclaimed goods. The fees, offences, and penalties are highlighted within the second and third schedules, respectively. Areas where trading is permitted and restricted are listed under Parts One and Two. Part three highlights the items that are permitted to be sold.

#### City of Mutare (Control of Livestock) by-laws

focus on regulating livestock movement, selling, and marketing. The by-laws define livestock as domesticated animals of both large stock and small stock. Added to that, the by-laws regulate stray stock, highlight offences and penalties in terms of areas of regulation, and encompass a schedule of gazetted fees for permits on selling or buying livestock or depasturing livestock for commercial and individual purposes. Furthermore, the by-laws encompass fees for keeping livestock in Mutare Urban, fees for a permit or support letter on moving livestock, and storage of livestock.

City of Mutare (Registration and Licensed Premises) by-laws regulate the issuing of premises licenses, general requirements for food handling premises, requirements for cafes, restaurants, hotels, tea rooms, lodging rooms, and boarding houses. They also regulate butcheries and fishmongers' shops, bakeries, food factories, food purveyors, caterers, and food vending machines. Additionally, they regulate bulk water operations, grain buying, grinding mills operations, and fish ponds. The laws also mandate the display of licenses and registration certificates on the premises. Inspections are also incorporated, and offences and penalties are highlighted under the third schedule. The types of specified premises are listed under the first schedule of the by-laws.

City of Mutare (Environmental and Natural Resources Conservation) by-laws regulate the preparation and adoption of a local environmental action plan, amendment of the plan, setting aside of grazing areas, designation of urban cultivation areas, and conservation of natural resource areas. Additionally, the by-laws regulate waste management sites, the use of environmental impact assessments on proposed urban projects, environmental rehabilitation plans and works on abandoned projects related







to natural resources, burning of vegetation and prevention of fires, invasive alien species, protection of wetlands, and establishment of the environmental committee and subcommittees. Furthermore, the cutting down of trees, harvesting, collecting, and or picking of fruits and forest produce is regulated by these by-laws. The protection of water sources, biodiversity, wildlife, and indigenous plants, air pollution, and solid and effluent waste management are all regulated in terms of the by-laws. Various offences and penalties are also encompassed in the third schedule of the by-laws.

#### 4.2.2 Specific Food Laws, Regulations, and Standards Affecting Youth-Led Food **Enterprises in Mutare**

The research revealed that while food value chain actors in Mutare may not readily identify specific laws uniquely targeting youth-led enterprises, they pointed to certain practices indicative of underlying policies that impact these ventures. Generally, the study suggests that most food policies affect all industry players uniformly. However, the capacity to adapt and comply with these regulations appears to be the differentiating factor. Expert interviews highlighted the potential impact of Statutory Instrument 145 of 201, which mandates that certain agricultural products, like maize, can only be sold to designated agencies such as the Grain Marketing Board (GMB). This regulation affects the market competitiveness of the entire food value chain. The SI prohibiting the buying and selling of maize outside the GMB, except for producers registered with the Agricultural Marketing Authority (AMA). This potentially discourages the involvement of youthled enterprises. Young people are often drawn to the food chain's market competitiveness, which typically correlates with higher financial returns. Removing this competitive edge through such regulations can negatively influence the

performance and attractiveness of youthbased enterprises. Overall, the aforementioned regulations are perceived to affect youth-led enterprises in a manner consistent with their impact on other actors, with the key difference lying in the ability to navigate and meet compliance requirements.

The general understanding and awareness of existing food laws, safety regulations, and standards in Mutare appear to be present at a high level, with approximately 90 percent of respondents in the food safety chain acknowledging some familiarity with the rules governing the food system. However, this awareness often lacks depth, as most participants cannot specifically identify the relevant laws. Instead, they refer to common practices that align with the provisions of key legislation such as The Public Health Act and The Food and Food Standards Act. These commonly understood practices include prohibitions against false product descriptions (e.g., mislabeling conventionally grown tomatoes as organic), the necessity of safe production practices to prevent contamination from pesticides, herbicides, and aflatoxins, the requirements for licensing and certification, the obligation to produce food that does not harm human health, the potential for inspection, seizure, and disposal of unsafe food, and the need for accurate food labeling.

Despite this general consensus that Zimbabwe possesses a framework of food laws aimed at ensuring public health and consumer protection, a significant gap exists in the specific knowledge of these policies. Even key experts within relevant government departments struggled to clearly outline the various food policies and their specific provisions. This policy knowledge gap is considerably wider between these experts and primary participants in the food system, such as vendors and consumers. The research suggests that this lack of detailed understanding may be









a significant contributing factor to issues of non-compliance. Furthermore, the study identified a trend where some individuals, while aware of the regulations, choose not to comply as a means of reducing costs. There was also a prevailing perception that The Public Health Act and The Food and Food Standards Act do not significantly impact informal entrepreneurs. These findings means the urgent need for enhanced awareness and dissemination of information regarding food laws and guidelines across all levels of the food system in Mutare.

# 4.3 THE GAPS IN THE KNOWN FOOD LAWS, FOOD REGULATIONS, AND FOOD STANDARDS IN ZIMBABWE

Emphasis is made to specific gaps that affect the development of youth-led food enterprises. The general population find gaps generally by observing that most foods on our shelves especially of informal business do not seem to have gone through relevant certifications. Other gaps felt in general include,

- Costly licensing and permitting processes Most regulations demand financial backstop which the discourage youths led business form compliance owing to lack of financial resources.
- Fragmentation and Lack of Coordination
   the respondents also acknowledge that
  the food safety laws and standards seem
  to be fragmented. The oversight is spread
  across multiple ministries and agencies. This
  leads to duplicated efforts, overlaps, and
  inefficiencies in enforcing standards. There's
  a lack of clear mechanisms to coordinate the
  activities of these different entities, which
  often operate independently.

- Lack of National food safety policy Zimbabwe lacks a comprehensive and enforceable national food safety policy to provide a clear framework, define roles, set standards, and outline enforcement procedures across the entire food chain.
- Standardization of conditions across all payers – On requirements and affordability there has to be a distinction between SMES and large manufacturing companies, youth led enterprises in terms of regulations. The existing food control system wasn't necessarily designed to cater to the large informal food sector, which may lack infrastructure support, training, and health education. There should be exceptional conditions to each of the groups. Vendors in Mutare believe that the laws were made with large enterprises in mind, where funding was sure and strong. While the set laws and regulations enforce best practices, a national standard on good manufacturing practices presented as a HACCP based food safety management system accessible and simplified for MSME and SME players of the food system would provide structured compliance and improvement of food safety.
- Fragmented and outdated legislation for example the Food and Food Standards Act has no regulations that cover horticultural fresh product. The regulations were crated in colonia rule and were never updated to relet the new policy contexts.
- Lack of harmonization of food laws, regulations and standards with international standards
- Limited Capacity There's a noted low capacity of food safety technical personnel and limitations in the capabilities of public







food control laboratories, including a lack of coordination and centralized data sharing.

#### 4.4 EFFECTS OF FOOD LAWS GAPS ON YOUTH-LED FOOD ENTERPRISES

The effects of existing food laws and any associated gaps significantly influence youth-led food enterprises in Mutare, presenting both positive and negative consequences. On the positive side, these laws foster an awareness of Good Agricultural Practices (GAP) among young producers, which ultimately safeguards consumers. Compliance with regulations and standards can enhance market access, as consumers increasingly seek food approved by relevant authorities, thereby building trust and credibility within the industry. Moreover, food laws contribute to order and food safety within the market, ensuring that products meet regulatory standards and boosting consumer confidence. Some youth in the study acknowledge that these laws, in principle, protect both consumers and producers, leading to improved food safety, enhanced credibility, and potentially broader market opportunities.

Conversely, several negative impacts were highlighted. The complexity of regulatory requirements poses a significant challenge for youth-led enterprises. The cost of certifications, such as those offered by the Standards Association of Zimbabwe (SAZ), is often prohibitive, leading some to forgo them. This lack of proper standards and certifications can impede market expansion, particularly hindering access to export markets. Furthermore, a lack of awareness regarding these laws can result in unintentional violations.

The high costs associated with compliance can lead to non-adherence, especially within informal markets. Some respondents also expressed concern that certain regulations may be implemented primarily as revenue-generating measures for enforcing organizations, citing examples like the Environmental Management Agency (EMA) emission standards. Additionally, regulations around controlled crops are perceived by some as reducing profitability. The capital-intensive nature of certain requirements presents a major hurdle for youth-led SMEs that often lack adequate funding. This potentially leads to cost-cutting measures and limiting access to more lucrative markets. The necessity for standardization and certification for export further restricts opportunities for young entrepreneurs who may lack the financial resources for these processes.

Overall, the negative impacts cited include a lack of resources, limited technical expertise, the difficulty of navigating complex regulations, and the potential for legal repercussions due to non-registration or unintentional breaches. The time-consuming nature of obtaining certifications can also negatively impact sales by delaying access to profitable markets. For startup SMEs, many food laws are deemed unfeasible due to insufficient capital for inspections, licenses, and skilled personnel. A significant information gap also exists. many young entrepreneurs only becoming aware of specific requirements when attempting to enter formal markets that demand documentation like lab analysis results and nutrient data.









#### 4.5 ADDRESSING THE REGULATORY GAPS AND OVERLAPS

Addressing the gaps with a focus on their impact on young people and their food enterprises is key.

- **Funding** There is need to avail more capital funding platforms and or collaborations where funds are pooled and distributed fairly.
- > Increase awareness Provide funding and knowledge that bridges the gaps. Involve the youth in development of food registration policies, training and capacity building, loans/ grants for startups. investing in training for food safety authorities and stakeholders to improve compliance, inspections, and enforcement of standards.
- Finalize Food and Feed Safety Act and the national Food Safety Strategy - Finalizing, approving, and enforcing the draft Food and Feed Safety Act and the national Food Safety Strategy to provide legislative consistency and a risk-based, science-driven approach to decision-making.
- Fostering regular communication and joint operations among government departments, supported by clear protocols and shared objectives.
- Updating and Modernizing Legislation.
- Enhancing in Capacity Building by "Benchmarking with other international food laws and regulations.

#### 4.6 COMPLIANCE, ENFORCEMENT AND IMPLEMENTATION OF FOOD, LAWS, STANDARDS, AND REGULATIONS

The effective enforcement and implementation of Zimbabwe's food laws, standards, and regulations are crucial for ensuring food safety and consumer protection. These processes are intended to align with the provisions of the relevant governing legislation. However, achieving consistent compliance across the diverse landscape of food businesses, particularly within the informal sector, presents a challenge. The dynamic nature of the food industry and emerging issues like food fraud necessitate continuous adaptation and the establishment of robust enforcement mechanisms. Non-compliance with food safety regulations in Zimbabwe is addressed through a range of measures, including the management of import and export permits, regular inspections, licensing procedures, and registration requirements.

A significant impediment to effective enforcement is the limited oversight in easily accessible markets such as open-air "musikas" and direct farm sales, which are infrequently visited by regulatory inspectors. This lack of monitoring makes it difficult to track the quality and safety of produce sold through these channels. Furthermore, a widespread knowledge gap regarding food laws exists, with many individuals unaware of the regulations that govern their operations. This lack of awareness hinders both enforcement efforts and attempts to educate stakeholders on their obligations. Even when awareness exists, the perceived high costs associated with compliance









can deter adherence. Some actors also believe that there is a lack of stringent measures or penalties for non-compliance, leading to a sense that violations often go unaddressed. Adding to the complexity, the specific laws and regulations applied can vary depending on the enforcing institution.

Overall, a lack of consistent commitment from the government to prioritize enforcement appears to be a contributing factor, this stems from issues such as demotivated and under-resourced food inspectors. Limited resources, encompassing both funding and personnel, significantly constrain the capacity for effective monitoring and implementation. The financial burden of compliance, including fees, infrastructure investments, certification costs, and the lengthy timeframes for obtaining necessary approvals, further complicates the situation. Allegations of corruption within law enforcement agencies also undermine the clarity and integrity of the enforcement process. Current methods of addressing non-compliance, such as city council "blitz" operations, are perceived by some as being ineffective and susceptible to corruption. While inspections, penalties, warnings, and closures are employed as compliance mechanisms, their overall effectiveness appears to be hampered by the aforementioned challenges.











Recommendations to improve the existing food laws, food regulations, and food standards

#### 5.1 THE RECOMMENDATIONS TO SUPPORT YOUTH-LED FOOD ENTERPRISES



#### **Develop Youth-Friendly Regulatory Support Mechanisms**

Simplify licensing, inspection, and registration processes for youth-owned food businesses, particularly in the informal sector.

Establish one-stop food enterprise support centres in urban areas like Mutare to assist with legal compliance, permits, and access to regulatory information.



#### Offer Regulatory Literacy and Compliance Training

Implement targeted training programs for young entrepreneurs on food laws, hygiene standards, labelling requirements, fortification regulations, and environmental compliance.

Develop practical compliance toolkits and guides co-designed with youth for use in SMEs and informal food enterprises.









## Promote Access to Affordable Infrastructure and Safe Food Spaces

Support youth-led vendors with access to safe, regulated markets, mobile kitchens, shared processing facilities, or youth hubs that meet food safety standards.

Partner with local authorities to pilot youth-friendly vending zones and food production clusters that meet municipal by-law standards.



## Facilitate Access to Finance and Incentives for Compliant Youth Enterprises

Establish food safety-linked youth enterprise funds or grant schemes to support youth investing in hygienic equipment, safe packaging, and certified inputs.

Offer tax incentives, start-up kits, or loan guarantees for youth businesses that comply with national food laws and standards.



## Institutionalize Youth Inclusion in Food Governance Structures

Create space for youth representation in local food safety committees, nutrition taskforces, Codex structures, and policymaking platforms at municipal and national levels.

Develop inclusive mechanisms for codesigning food policies and standards with youth input.



## Promote Innovation, Digitization and Agroecological Enterprises

Support youth-led digital innovations in food traceability, mobile inspection reporting, e-certification, and online food safety education.

Incentivize youth enterprises practicing agroecology, climate-smart agriculture, or organic food production through training, recognition, and legal support.



#### Strengthen Youth Networks and Cooperatives in Food Value Chains

Facilitate the formation and legal registration of youth food cooperatives and associations to strengthen bargaining power, market access, and regulatory compliance.

Support peer-to-peer mentorship between established food processors and emerging youth-led food businesses.









#### 5.2 THE RECOMMENDATIONS TO POLICY MAKERS



#### Modernize and Harmonize Outdated and Fragmented Food Laws and Policies

Review and update core legislation such as the Food and Food Standards Act, Public Health Act, and sector-specific food SIs to align with international standards (e.g., Codex Alimentarius) and regional protocols (e.g., SADC Food Safety Framework).

Integrate science-based and risk-based approaches such as HACCP, food traceability, and emerging food safety risks (e.g., GMOs, e-commerce, climate change impacts).



#### Institutionalize Multi-Stakeholder and Inter-Ministerial Coordination

Formalize coordination platforms or National Food Safety Committees that bring together policymakers, regulators, private sector, academia, consumer groups, and youth-led enterprises to ensure cohesive food policy design and enforcement.

Develop Memoranda of Understanding (MOUs) between overlapping regulatory bodies to minimize duplication and streamline enforcement.



#### Align Municipal and Local By-Laws with National, Regional and **International Frameworks**

Support the review and harmonization of urban municipal by-laws (e.g., food vending, licensing, inspections) to align with national food laws and promote ease of compliance for SMEs and informal vendors.

Provide legal drafting support to local councils (e.g., Mutare City Council) to update and enforce food safety by-laws.



#### Strengthen Enforcement, Compliance, and **Inspection Systems**

Enhance national inspection protocols and risk-based inspection systems with clear checklists, roles, and enforcement actions.

Invest in training, accreditation, and equipping of local food inspectors and environmental health officers with digital tools for real-time reporting and compliance tracking.











#### Enhance Legal Provisions for Consumer Rights and Nutrition Labelling

Amend food laws to further comprehensively guarantee consumer rights to safe, clearly labelled, and nutritious food, including mandatory nutrition labelling, allergen declarations, and transparent origin tracing.

Ensure consumer education is integrated into policy through media, schools, and community awareness campaigns.



## Enforce Regular Review and Adaptability of Food Laws

Institute a mandatory review cycle (e.g., every 5 years) for all major food laws and policies to remain responsive to scientific advances, trade trends, and public health risks.

Embed flexible provisions in law that allow for rapid updating of food standards through ministerial regulations or technical committees.



## Mainstream Food Governance into National Development and Climate Policies

Integrate food safety and governance into the National Development Strategy (NDS1), climate adaptation plans, agricultural policy frameworks, and disaster preparedness plans to ensure cross-sectoral integration.

Adopt a One Health and agroecological lens in food law reforms, recognizing the interdependence between human, animal, and environmental health.



## Support Youth and Women in the Regulatory Framework

Introduce legal incentives or quotas to promote youth- and women-led participation in regulated food value chains (e.g., priority licensing, compliance assistance, representation on governance boards).

Ensure gender and age-disaggregated analysis is embedded in food policy reviews.



#### Establish a specific separate National Codex Committee and Capacitate it

Create a separate legally mandated National Codex Committee and Codex Contact Point to facilitate Zimbabwe's participation in global food standard-setting processes and promote alignment with Codex guidelines.

Provide technical training and stakeholder representation in Codex decision-making structures.









#### 5.3 THE RECOMMENDATIONS TO DEVELOPMENT PARTNERS

- Provide technical and financial assistance to review and update core food laws such as the *Food and Food Standards Act* to integrate risk-based approaches (e.g., HACCP), Codex alignment, and emerging issues like GMOs, e-commerce, climate risks, and biotechnology.
- Collaborate with government stakeholders to establish or capacitate a centralized and coordinated National Food Control Authority that harmonizes regulatory functions across ministries and agencies (e.g., Health, Agriculture, Local Government).
- Provide support to city councils (e.g., Mutare, Harare) for the development and enforcement of urban food safety by-laws, and invest in training health inspectors, digitizing licensing systems, and strengthening local food safety surveillance.
- > Facilitate the creation of multi-sectoral food governance platforms that include government, civil society, academia, youth groups, and the private sector to ensure inclusive participation in policy development and oversight.
- Support the development of integrated food safety data management systems, risk-based inspection protocols, and regular surveillance to guide evidence-based decision-making.
- > Invest in public education on food labelling, fortification, hygiene, and rights to safe food through schools, media, community dialogues,

- and digital platforms especially targeting youth and informal vendors.
- Assist Zimbabwe in harmonizing national regulations with Codex Alimentarius, WTO SPS/TBT Agreements, and SADC/COMESA food trade standards to improve food exports and protect public health.
- Fund academic and policy research on food systems governance, informal markets, and food law innovation to inform adaptive policymaking especially under the One Health and agroecology approaches.
- Empower youth and women food actors by supporting inclusive policies, representation in decision-making platforms, and capacity building in regulatory compliance and advocacy.

#### Promote Digitalization and Innovation in Food Governance

Support the development of e-certification platforms, mobile-based food safety reporting systems, and digital food labelling tools to modernize the food regulation landscape.

#### **Invest in Fortification Monitoring** and Nutrition-Sensitive Regulation

> Support implementation of robust monitoring systems for food fortification programs and integrate nutrition objectives into broader food regulatory frameworks, especially in urban areas like Mutare.









#### 5.4 RECOMMENDATIONS TO APPROPRIATE AUTHORITIES IN THE FOOD SYSTEM



## Improve Coordination Across Regulatory Institutions

Establish a formal inter-agency coordination mechanism (e.g., National Food Safety Committee) to harmonize mandates, share data, and coordinate inspections and enforcement across health, agriculture, trade, local government, and environmental agencies.



## Strengthen Capacity for Risk-Based Inspection and Monitoring

Invest in training, equipping, and accrediting food inspectors, especially at the local government level, to apply risk-based food safety monitoring, enforcement protocols, and traceability systems across value chains.



#### Update and Align Technical Standards and Guidelines

Regularly review and align technical food standards, codes of practice, and inspection protocols with Codex Alimentarius, SADC Regional Standards, and other international benchmarks to improve regulatory consistency and trade readiness.



## Decentralize Food Regulation and Support Local By-law Implementation

Provide financial and technical support to urban authorities like Mutare City Council to draft, enforce, and monitor food safety and hygiene by-laws, especially in markets, food stalls, and informal food enterprises.



#### Promote Public Awareness and Consumer Engagement

Develop and implement nationwide food safety awareness campaigns to educate consumers, vendors, and food businesses on hygiene, labelling, storage, and regulatory compliance, thereby improving voluntary adherence and citizen oversight.









#### 5.5 GENERAL /GENERIC RECOMMENDATIONS



## Strengthen Institutional Coordination and Policy Coherence

Establish a multi-sectoral national food governance platform that brings together all relevant ministries, local authorities, regulatory bodies, and civil society to ensure integrated planning, clear role delineation, and harmonized enforcement across the food system.

## Modernize the Legal and Regulatory Framework

Review and update existing food laws, standards, and by-laws to reflect current scientific knowledge, international best practices (e.g., Codex), and emerging food safety risks, while ensuring the inclusion of informal sector realities and youth-led enterprises.



#### Promote Inclusive and Transparent Governance

Ensure meaningful participation of all stakeholders including youth, women, smallholder farmers, consumer groups, and private sector actors in food policy formulation, monitoring, and decision-making processes, to foster trust, accountability, and local ownership of food governance systems.











## 6. Institutional Frameworks and Mandates on Food Laws, Policies, Regulations and Standards

Consultations with representatives of Ministries, departments and agencies responsible for food safety is key in understanding their roles and responsibility. The consultations unearthed that there are quite a number of players involved in the food systems in Zimbabwe and Mutare in particular.

# 6.1 THE ROLES AND RESPONSIBILITIES FOR PRIMARY APPROPRIATE AUTHORITIES IN FOOD SAFETY AND REGULATION

The general public primarily recognizes and interacts with several key authorities responsible for ensuring food safety and regulating the food sector. These include the Agricultural Marketing Authority (AMA), the Standards Association of

Zimbabwe (SAZ), Agrikilimore, the Medicines Control Authority of Zimbabwe (MCAZ), local councils, the Consumer Protection Commission of Zimbabwe, the Environmental Management Agency, and ZimTrade These are the entities whose presence and enforcement actions are most visible to the general population.

In Zimbabwe, food laws and regulations are primarily overseen by the Ministry of Health and Child Care and the Food Standards Advisory Board. The Food and Food Standards Act provides the legal framework, with the ministry responsible for enforcing regulations and the board providing advice on food safety. The Ministry of Health and Child Care also conducts inspections, samples food, and analyzes it to ensure compliance with food safety standards.







Ministry / Department	Roles and responsibility				
Ministry of Lands, Agriculture, Fisheries, Water and Rural Development	<ul> <li>Ensuring food safety and security through the implementation of the Food and Food Standards Act and other related legislation.</li> <li>The ministry is responsible for formulating agricultural policies, developing strategies for food self-sufficiency, and ensuring the safety of food products.</li> <li>Setting standards for farming practices, managing animal health (through the Department of Veterinary Services), regulating the use of agrochemicals, and overseeing seed quality.</li> <li>Ensures the safety and sustainability of the primary production stage of</li> </ul>				
Ministry of Health and Child Care (MoHCC)	<ul> <li>Setting food safety standards, conducting inspections of food premises, monitoring hygiene, investigating foodborne illnesses, and enforcing regulations related to food handling</li> <li>Establishes the fundamental health and safety parameters within which the food system operates</li> </ul>				
Standards Association of Zimbabwe (SAZ)	<ul> <li>Developing and promoting quality and safety standards across industries, including food.</li> <li>Creating national standards (ZWS), offering certification services (e.g., ISO 22000, HACCP), and providing training on these standards.</li> <li>Provides benchmarks for quality and safety that businesses can adhere to, contributing to a more reliable and potentially sustainable food supply.</li> </ul>				
Environmental Management Agency (EMA)	<ul> <li>Ensuring environmental sustainability within all sectors, including the food system.</li> <li>Enforcing environmental regulations related to agricultural practices, food processing, waste management, and pollution control.</li> <li>Promotes the environmental sustainability of the food system by ensuring compliance with environmental laws.</li> </ul>				
Ministry of Industry and Commerce	<ul> <li>Overseeing fair trade practices and consumer protection.</li> <li>Regulating aspects of the market to ensure fair competition and accurate information for consumers, which can indirectly support a sustainable system by preventing unfair practices that might undermine it.</li> <li>Contributes to a fair and transparent market environment within the food system."</li> </ul>				









Ministry / Department	Roles and responsibility			
Veterinary Services Department (under Agriculture Ministry)	<ul> <li>Implements animal health controls, disease surveillance, and certification of meat and animal products for food safety.</li> </ul>			
National Biotechnology Authority of Zimbabwe	<ul> <li>Regulates research, use, and marketing of genetically modified organisms (GMOs) and biotechnology products in food and agriculture.</li> </ul>			
Agricultural Marketing Authority (AMA)	<ul> <li>Promotes orderly marketing of agricultural products, pricing regulation, and value chain coordination of food commodities.</li> </ul>			
Food Standards Advisory Board	Provides technical advice and guidance on national food standards and food safety regulations under the Food and Food Standards Act.			
Zimbabwe Revenue Authority (ZIMRA)	<ul> <li>Monitors import/export of food products, ensures adherence to food- related trade regulations and tariff classifications.</li> </ul>			
Consumer Protection Commission	Enforces the Consumer Protection Act, safeguards consumers from misleading food labelling, unsafe food products, and unfair market practices.			
Urban and Rural Local Authorities (e.g., Mutare City Council)	<ul> <li>Enforce local food by-laws, inspect food premises, issue shop licences, and ensure basic food safety at markets, restaurants, and small-scale vendors.</li> </ul>			
Zimbabwe Food and Nutrition Council (ZFNC)	<ul> <li>Coordinates food and nutrition policy at national level, monitors food and nutrition programs, and integrates food security into national development planning.</li> </ul>			
Research and Academic Institutions (e.g., University of Zimbabwe)	<ul> <li>Support food systems governance through research, policy analysis, training, and innovation in food safety, nutrition, and agriculture.</li> </ul>			

# 6.2 COORDINATION AND COLLABORATION AMONG THESE DIFFERENT REGULATORY BODIES IN THE FOOD SYSTEM

There is lack of coordination between the ministry and health and agriculture among other ministries resulting in overlapping and duplication of duties. Although government is focused on coordinating the efforts of its ministries and departments, coordination is still poor as silos are yet to be broken. Historically, coordination among Zimbabwe's food regulatory bodies has been fragmented with limited formal interaction, leading to potential overlaps and inefficiencies. Efforts are underway, particularly through the implementation of a National Food Safety Strategy (NFSS) 2022-2026 to improve collaboration and define clearer roles. The goal is a more streamlined and effective regulatory environment for the food system.







#### CONCLUSION

As Zimbabwe stands at the crossroads of food systems transformation, Mutare emerges as a dynamic test case for the country's evolving food regulatory landscape. This compendium highlights that while the legal and policy framework governing food safety and systems in Zimbabwe is broad and diverse, its effective impact in Mutare hinges on harmonized enforcement, localized interpretation, and youth-driven innovation. The urban food environment shaped by informal traders, SMEs, municipal regulators, and consumers demands context-responsive laws that are not only aligned with international standards but also grounded in the daily realities of Mutare's residents. Strengthening institutional coordination, updating outdated laws, and supporting emerging actors particularly youth-led food enterprises will be key to unlocking the full potential of urban food governance. With this compendium as a guiding and reference tool for the existing food governance and regulatory framework, Mutare can become a model city for food safety, resilience, and inclusive urban development in Zimbabwe, catalyzing a food future that is safe, sustainable, and just for all.











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