

# *Overview of the Food Imports Landscape and Discussion of a Systems Approach*

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# FSMA

## *Guiding Principles*

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1. Flexibility optimizes food safety outcomes
2. Harmonization with global standards and principles
3. Utilize a holistic food safety *systems* approach
4. Food safety facilitates global trade
5. Role of 3<sup>rd</sup> party accredited certification
6. Food safety applies to all foods
7. Testing as a tool to verify food safety systems are preventing hazards

# Partnership Global-to-Local Food Safety Systems

## Country Infrastructure

2

Science Based Standards

**Laws & Regulations**  
Nat'l to Local Regulations,  
Imports/Exports

**Inspection & Compliance**  
Network of Labs & Inspectors  
Verify Compliance

1

**International Governance**  
CODEX-OIE-IPPC & WTO

Primary Production  
Animal Food (feed)  
Food Manufacture  
Packaging Material  
Distribution  
Retail

Food Chain

3

Guidelines & Recommendations

**ISO**  
Voluntary Measures

**GFSI**  
Capacity Building,  
Benchmarked Systems

**Food Safety Management Systems**  
Accredited Certification,  
Transparency

4

International Organization  
for Standardization

**Business Initiatives**

Science Based  
Standards

1

## International Governance

CODEX-OIE-IPPC & WTO

Guidelines &  
Recommendations

### Rationale

- Countries are dependent on each other for food

### World Trade Organization

- Govt's established WTO & Sanitary/Phytosanitary (SPS)

### CODEX-OIE-OPPC

- "Three Sisters"
- Recognized by SPS as setting international standards
  - *Codex Alimentarius* - Food Safety
  - *International Plant Protection Convention* - Plant health
  - *World Organization for Animal Health* - Animal Health



## Rationale

- Strong food safety systems protect consumers & affects imports/exports

## Laws & Regulations

- Regulations derived from international science based standards (CODEX)
- Some may reference ISO voluntary measures

## Inspections & Compliance

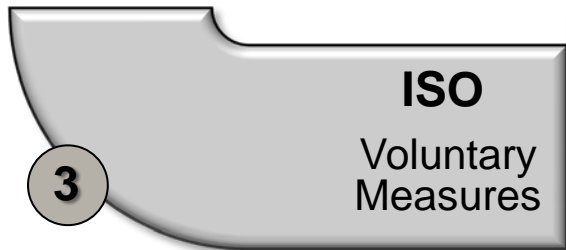
- Network of national/state/local labs & inspectors
- Verify compliance & investigate issues to aid prevention

### Rationale

- Builds on science based standards, guidelines & recommendations.
  - Strategic partnership with WTO to facilitate market requirements
  - Does not regulate, legislate, certify, or accredit
  - 163 country national standards institute members collaborate on development of voluntary measures

### Voluntary Measures

- Measures for accreditation, certification, auditing, auditor competency, FSMS
- Standardizes implementation and consistency along the food chain
- May become market requirement or referred to in regulations / legislation



International Organization  
for Standardization

### Rationale

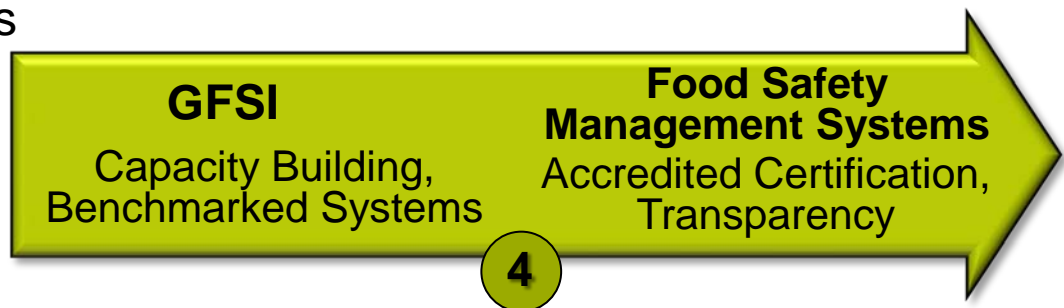
- Food Safety is a pre-competitive issue with collaboration to mitigate risk

### Global Food Safety Initiative (GFSI)

- Multi-stakeholder benchmarking of food safety systems
- Requirements for food safety systems & their delivery
  - “Once certified, accepted everywhere”
- Capacity building through progressive Global Markets program

### Food Safety Management Systems (FSMS)

- Robust food safety systems
- Accredited Certification
  - Independence
  - Transparency
  - Confidence



## **Business Initiatives**



### Rationale

- Development of an industry-recognized toolkit of voluntary food safety requirements for Primary Production and Manufacturing

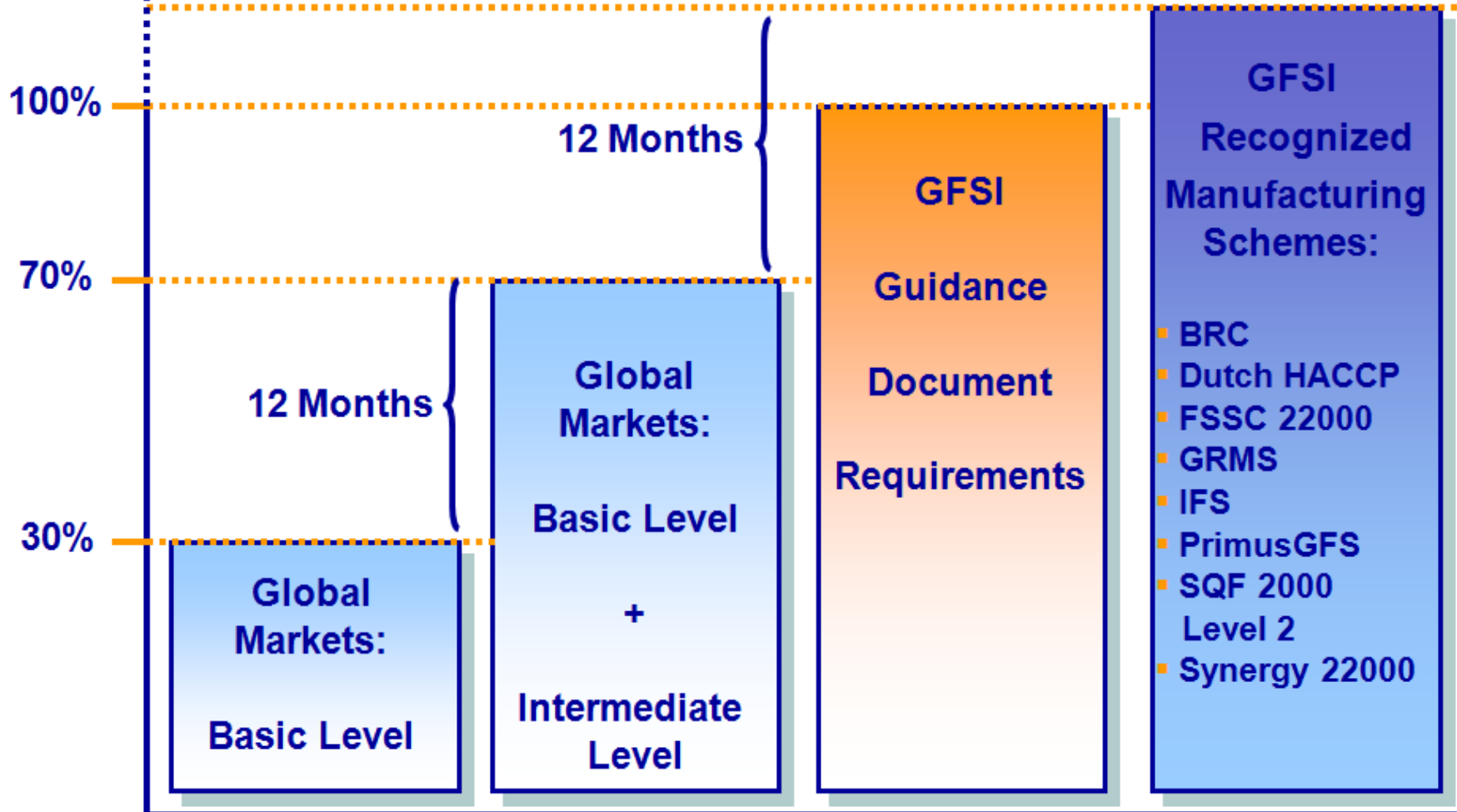
### Successful pilot and UNIDO support

- Basic and intermediate level requirements have been successfully carried out all over the world, including Ukraine, Egypt, USA, Chile, Mexico, and China.
  - ✓ Facilitating market access locally
  - ✓ Create mutual acceptance along the supply chain
  - ✓ Mentoring of suppliers



# GFSI Global Market Program Drives Continuous Improvement

## Matching Level



# Partnership

*Effective, Efficient, Protecting Consumers*

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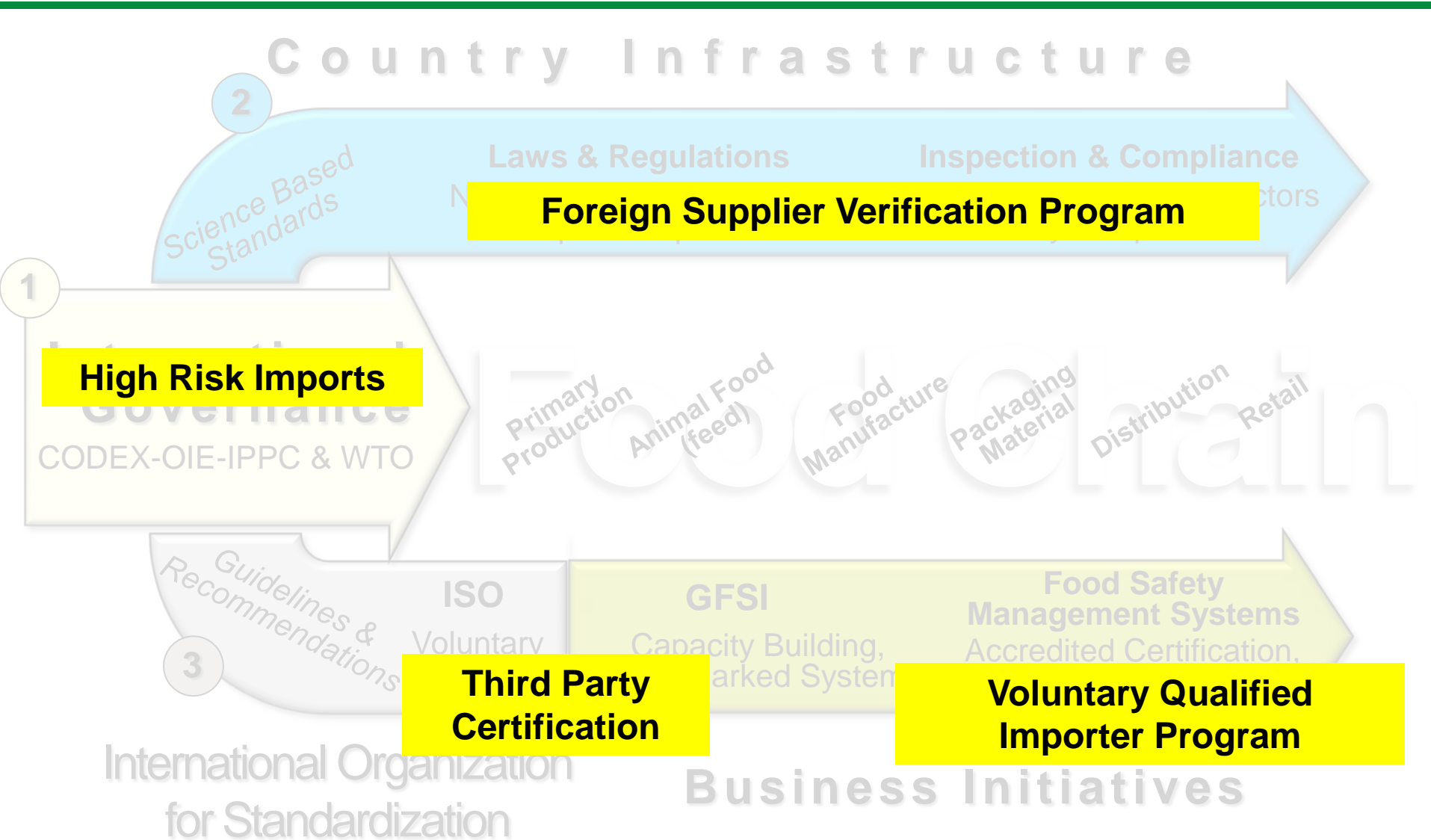
**Food Safety Management Systems**  
Accredited Certification,  
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International Organization  
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**Business Initiatives**

# Effective Integration of FSMA Programs

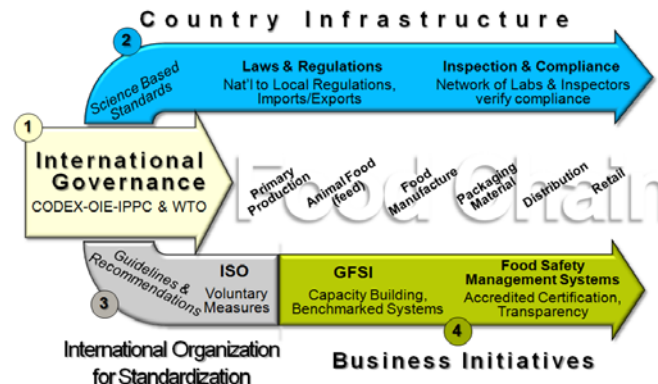
## High Risk, FSVP, 3<sup>rd</sup> Party, VQIP



# FSMA

## Import Summary

- Structure & mechanism for effective global partnership are in place
  - ✓ Academia, consumer groups, government, industry
- Resources efficiently applied based on science and risk
- Shared goal of safe affordable food
- Confidence in food safety enhances global trade
- Business shoulders the responsibility for safe food



# 1 International Governance

When it comes to food, countries are less self-sufficient and more dependent on each other than ever before. The WTO/SPS agreement and science based standards, guidelines and recommendations of the 'Three Sisters' provide the foundation for food suitable for consumption.

## World Trade Organization (WTO)

To work together, governments collectively established the WTO and in the case of food safety, the Agreement on Sanitary and Phytosanitary Measures (SPS).

### 3 'Three Sisters'

Recognized by the SPS agreement as the relevant bodies for setting international standards, guidelines and recommendations for food safety, plant health and animal health.

### Guidelines and recommendations

Science based food safety principles and practices including food hygiene, hazard analysis and critical control points (HACCP), import and export guidelines etc.

# 3 International Organization for Standardization (ISO)

To meet both societal needs and business requirements for food safety, ISO voluntary measures build from science based standards, guidelines and recommendations. ISO is a non-governmental organization. It does not regulate, legislate, certify or accredit.

### Voluntary measures

Help demonstrate that food produced is suitable for consumption. Examples include prerequisite programs such as early identification and control of food safety hazards, compliance with applicable regulatory requirements, and management systems such as ISO 22000 that address standardized implementation and consistency along the food chain.

# 2 Country Infrastructure

### 1 Science based standards

Science derived product characteristics such as maximum residue limits, permissible levels of food additives, contaminants, toxins etc.

Food safety directly affects potential growth. Countries with strong food safety infrastructures are better positioned to protect public health, increase productivity, capture new export opportunities and limit exposure to substandard food imports.

### Laws and regulations

National to local legislation and regulations derive from international science based standards, guidelines and recommendations. Some regulations may also refer to ISO voluntary measures.

### 6 Inspection and compliance

Carried out through a network of national, provincial and local inspectors and laboratories to detect problems, verify and ensure compliance in food and related facilities.

# Global-to-Local Food Safety

From fresh local tomatoes to exotic ingredients from faraway tropical islands, our food comes to us in ways never before imaginable. Availability, affordability and variety are important and food safety is paramount for protecting public health and preventing food borne illness.

Minimizing chemical, biological or physical hazards that may occur anywhere along the food chain requires ongoing effort at different levels. Governments collaborate through international bodies to establish science based standards, guidelines and recommendations based on scientific principles and evidence. Countries test, inspect and verify compliance to applicable laws and regulations; The International Organization for Standardization (ISO) develops voluntary measures to address 'food systems management' across the food supply chain, and; Businesses seek certification to 'codes of practice' that increase transparency and mitigate risk.

It is not always easy. Implementing food safety can lead to 'tension points' surrounding roles and responsibilities. Nonetheless, food safety remains a shared responsibility requiring all, including consumers and final preparers of food, to be actively engaged.

# 4 Business Initiatives

Progressive businesses do not regard different levels of food safety as a competitive advantage. Food safety becomes a collective challenge, part of 'pre-competitive specs'. Adoption and certification of 'codes of practice' and the GFSI initiative increase transparency and mitigate risk along the food chain.

### 4 Codes of practice

Detailed and specific processes and procedures for individual sectors of producers to show that food is suitable for consumption. Codes of practice are also known as 'certification schemes'.

### 5 Management and certification

Food systems management including certification i.e. recognition by an independent certification body of successful adoption and compliance to a specific code of practice. Periodic audits are normally required to maintain certification.

## Four components of Food Safety

### 1 INTERNATIONAL GOVERNANCE

The SPS agreement: Affirms the right of every country to protect its animal, plant and human health and lays out rules and disciplines to guide its adoption, implementation and enforcement relating to trade. Member countries are obligated to align their laws and regulations with disciplines outlined in the agreement. Providing governance, scientific and technical expertise for the WTO and the Three Sisters is a shared responsibility across countries.

'Three Sisters': Food and ingredients can come from many different countries in many different ways. To advance greater harmonization, the SPS agreement recognizes the Codex Alimentarius (Latin for 'food code'), the International Plant Protection Convention (IPPC) and the World Organization for Animal Health (OIE). Adoption by consensus of prescribed measures is the desired goal. However, the entire process from initial proposal to scientific evaluation and final approval may take several years.

### 2 COUNTRY INFRASTRUCTURE

International to country level laws and regulations: Countries can adopt international standards, guidelines and recommendations of the Three Sisters without further scientific justification. Countries may also adopt more stringent measures so long as it is non-discriminatory. For example, applying more stringent scientific requirements for imported food but not domestically.

Food safety infrastructure: Wide variability exists within and across countries in the level of food safety laws, regulations and competencies of laboratories, inspectors and leadership. Low food safety priority can contribute to wide spread outbreaks. Suspect food safety infrastructure can lead to increased testing, inspection and verification on the part of the importing country and limit opportunities for the exporting country.

### 3 INTERNATIONAL ORGANIZATION FOR STANDARDIZATION (ISO)

ISO comprises national standards institutes of some 183 countries. Full members of ISO can take part in the development of any voluntary measure which it deems important to its economy. Each ISO member has one vote. ISO voluntary measures may become market requirements or referred to in regulations or legislation. ISO maintains a strategic partnership with the WTO.

### 4 BUSINESS INITIATIVES

Understanding codes of practice, certification, certification bodies and accreditation: In general, codes of practice are designed and owned by non-for-profit organizations for a particular sector of concern, e.g. food animal inputs. They derive from science based standards, guidelines and recommendations of the Three Sisters and/or ISO voluntary measures. Certification of a code of practice is granted only after extensive review and such of the business by an independent 3rd party certification body. Certification bodies must be licensed by a code of practice owner to audit businesses seeking certification. Also, certification bodies must be recognized or accredited by well established accreditation authorities as having the skills and competencies necessary for granting certification.

Global Food Safety Initiative (GFSI): An independent non-for-profit foundation whose primary activity is to assess or 'benchmark' codes of practice - determine if a requested code of practice is aligned with common criteria (e.g. Code general principles on food hygiene). GFSI recognized codes of practice means there is a common foundation of criteria that should provide consistent results. It does not mean that all recognized codes of practice can be considered as equal.

### Tension points

1. Confusion from shared terminology: Terms such as 'code of practice' can vary depending on context (public vs. private), intent (norm vs. requirement) and application (voluntary vs. mandatory).
2. Private sector establishing 'official standards': Product characterization determined by the private sector such as upper tier products for attribution than those officially established nationally or internationally.
3. Inability of international standard setting organizations to address market sensitive issues: The emergence of a new tool or add-on that erodes consumer confidence when an applicable international measure is lacking.
4. Codes of practice that couple food safety with nonfood safety obligations: The inclusion of labor or environmental criteria that fall outside official food safety measures but oblige compliance in order to receive certification.
5. Proliferation of business codes of practice and audit methodologies: The growth in similar codes of practice each requiring separate audits that collectively increase inefficiencies while not contributing to overall food safety.
6. Competence of official government setting, inspection and certification: Gaps and variation in overall official food safety infrastructures that erode consumer confidence and exacerbate outbreaks.

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