

FDA Food Safety Modernization Act
**Five Years to Safer
Imports**

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Science in the
Public Interest

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CSPI/SFI and IACFO

- **The Center for Science in the Public Interest (CSPI) is a bi-national NGO representing over 850,000 consumers in both the U.S. and Canada.**
- **Safe Food International (SFI), a CSPI project, partners with consumer organizations in other regions of the world on food safety issues.**
- **The International Association of Consumer Food Organizations provides representation in Codex for consumer organizations on five continents.**

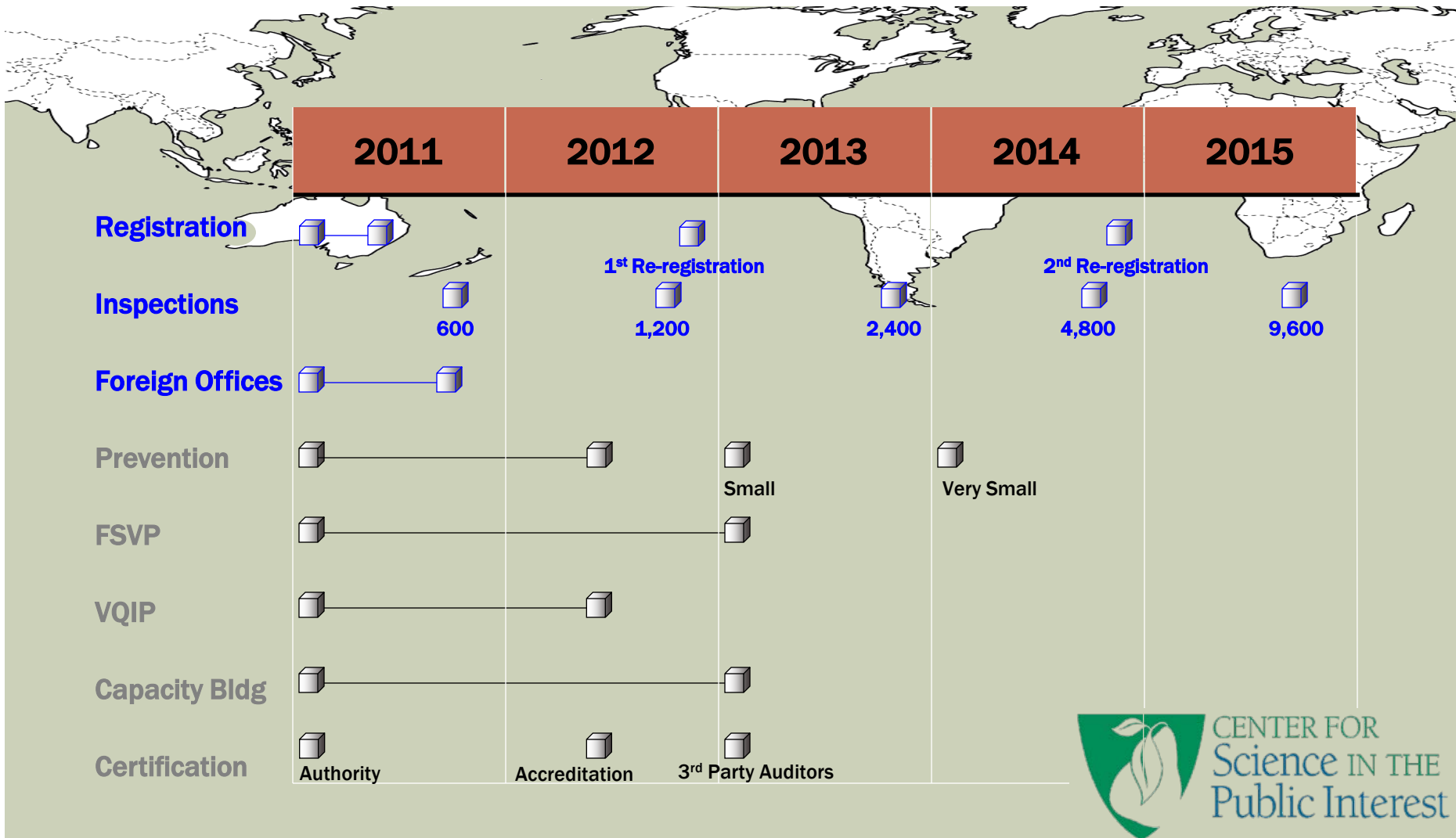
FDA Food Safety Modernization Act

- Foreign facilities:
 - Register biennially
 - May be suspended
 - Prevention programs
- Inspection mandate
- Foreign offices
- Foreign Supplier Verification Program
- Voluntary Qualified Importer Program
- Capacity building programs
- Certification of high-risk foods



President Obama signs FSMA Jan. 4, 2011

Timeline

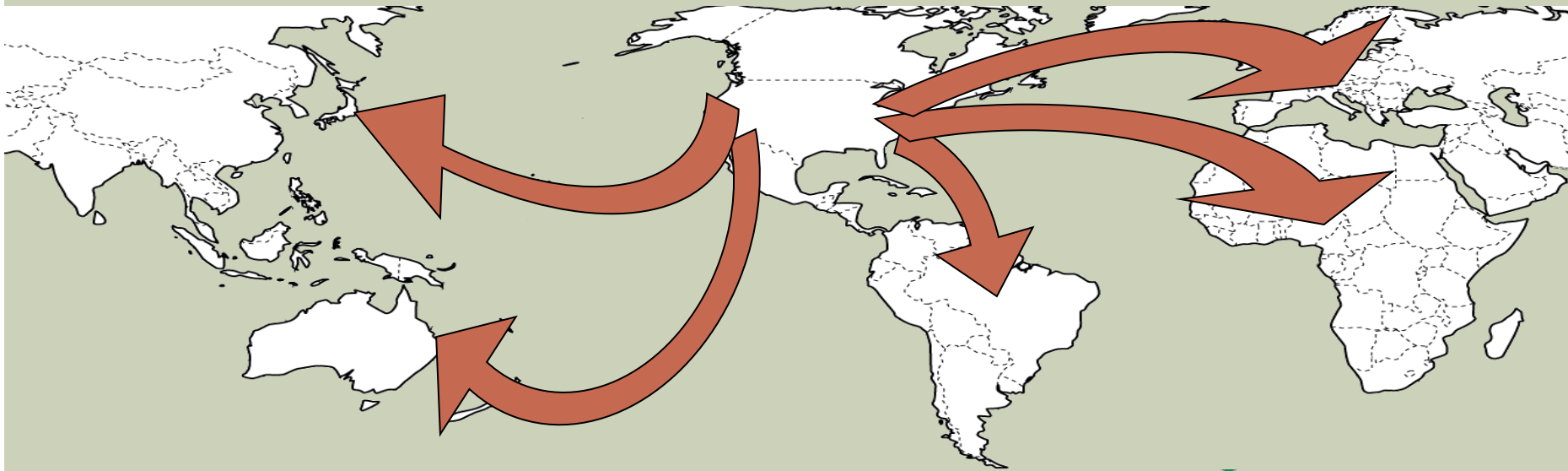


Year 1: Registration (and Suspension)



Year 1: Foreign Facility Inspection

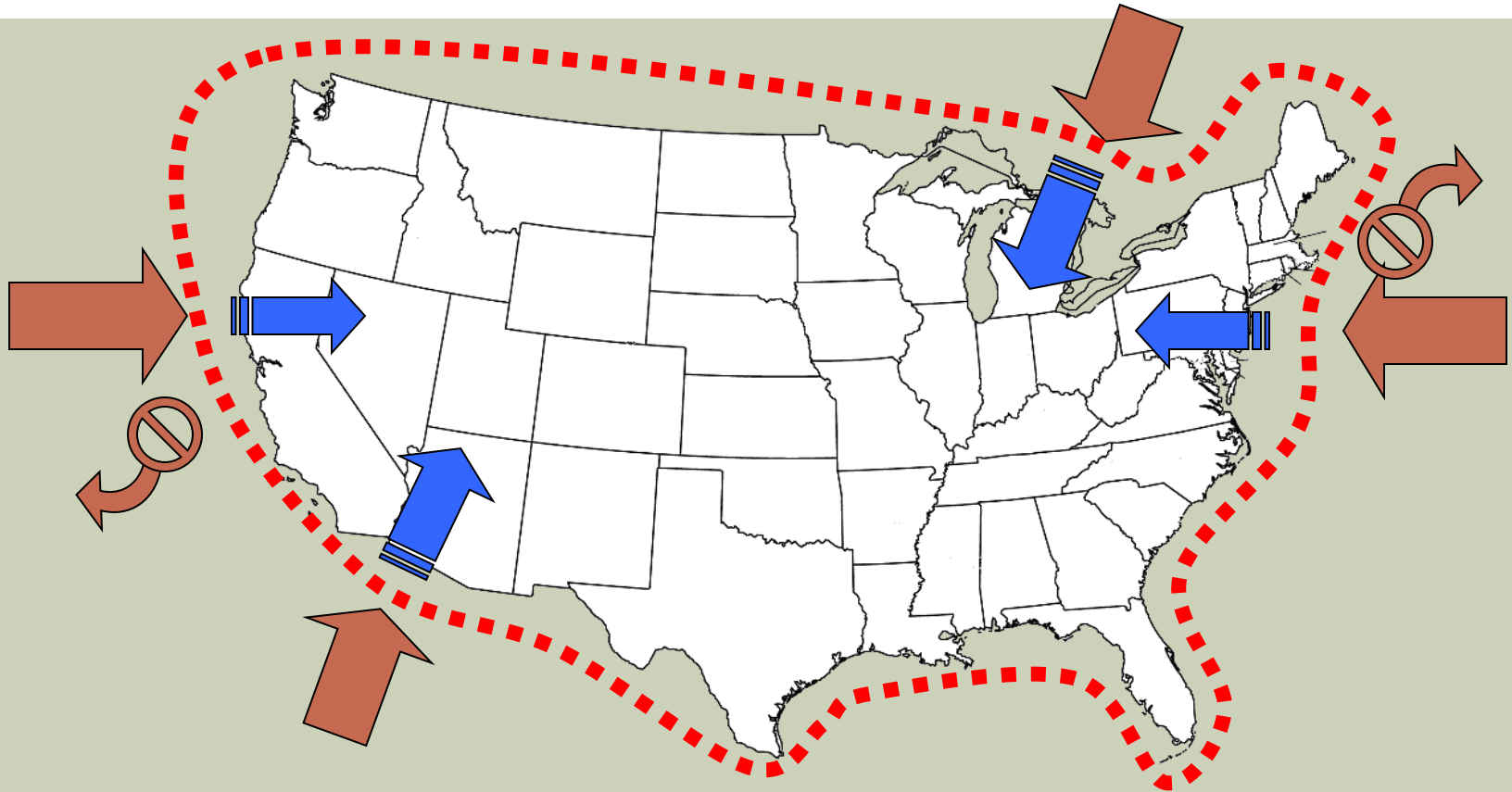
- ➔ New mandate to inspect foreign facilities
 - Double foreign facility inspections every year for five years
 - Can refuse products from facilities that refuse inspection
 - Interagency agreements on inspection of seafood



Year 1: Foreign Offices



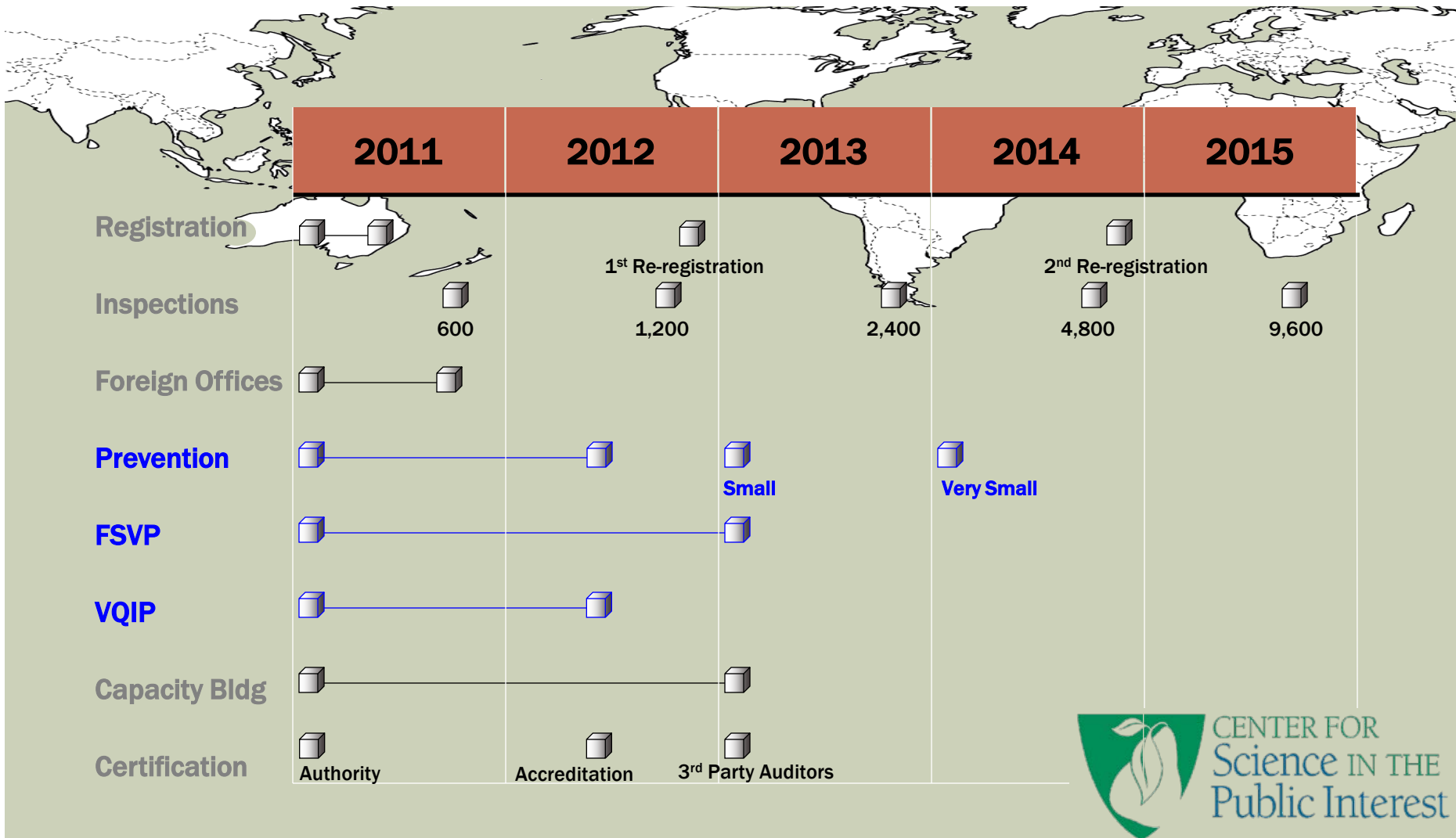
Year 1: Border Inspection



■ Changes to border inspections

- Interagency agreements on inspection of seafood
- Risk-based border inspection

Timeline



18 Months: Prevention

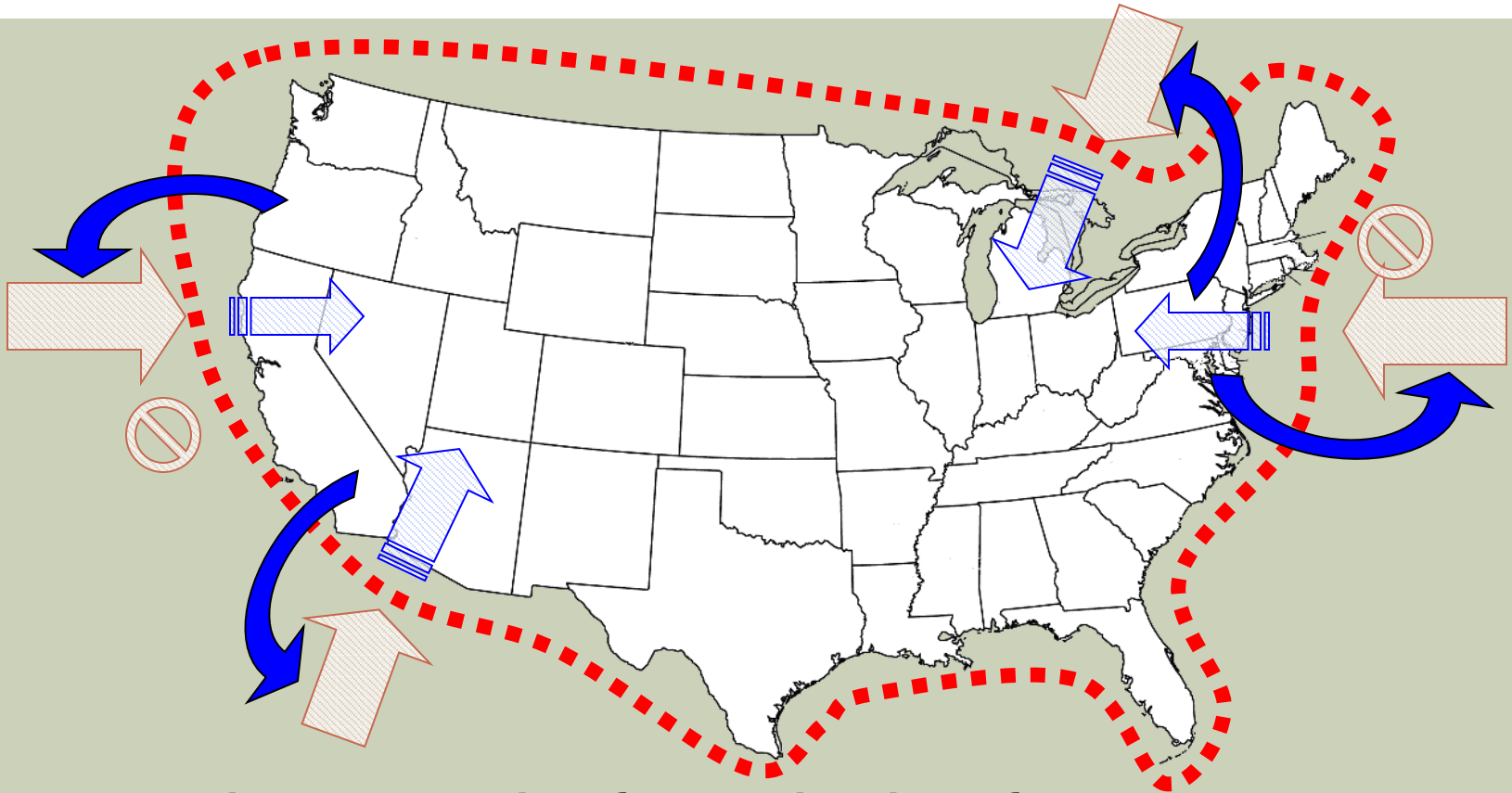
- Foreign and domestic facilities must implement a food safety plan that includes:
 - Hazard analysis
 - Preventive controls
 - Sanitation
 - Food allergen control
 - GMPs
 - Environmental monitoring
 - Employee training
 - Supplier Verification
 - Recall plan
 - Monitoring and records
 - Verification steps
 - Corrective action plan
 - Records of corrective actions
 - Recall plan



Year 2: Foreign Supplier Verification Program

- Importers must implement FSVP that includes:
 - Assurance that foreign supplier has risk-based preventive controls.
 - Verification steps such as --
 - Monitoring records for shipments,
 - Lot-by-lot certification,
 - Annual on-sight inspection,
 - Checking foreign supplier's HACCP plan, or
 - Verification testing.
 - Records that must be accessible for inspection.

FSVP Introduces “Look-Back” to Enhance Import Safety

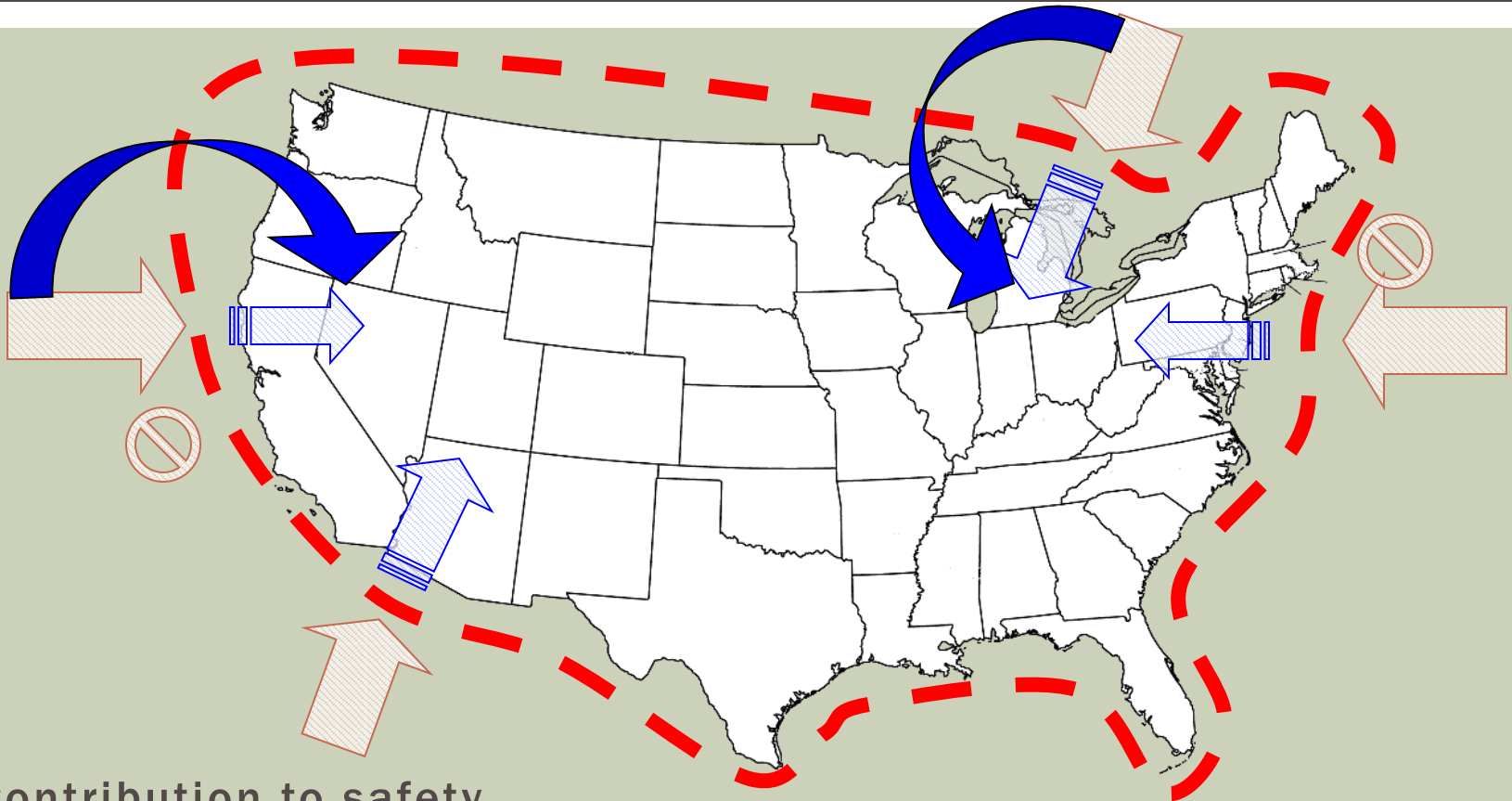


- Importer is accountable for product's safety.
- FSVP required regardless of risk.

18 Months: Voluntary Qualified Importer Program

- Importers may obtain expedited review
 - Application (notice of intent to participate in VQIP)
 - Certified facility is source for food
 - FDA reviews application for risk factors

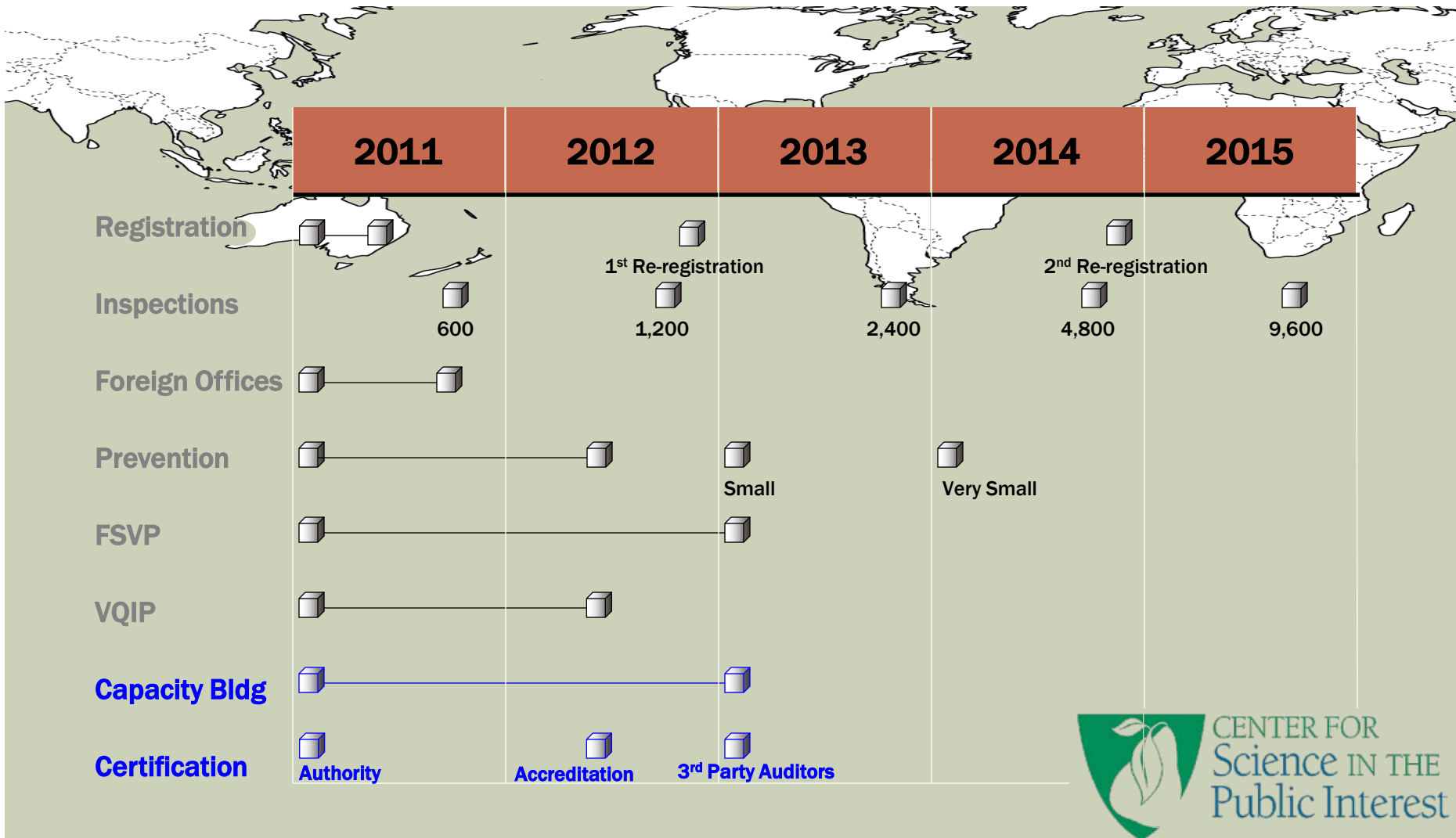
VQIP Lets Importers Jump to Head of Line



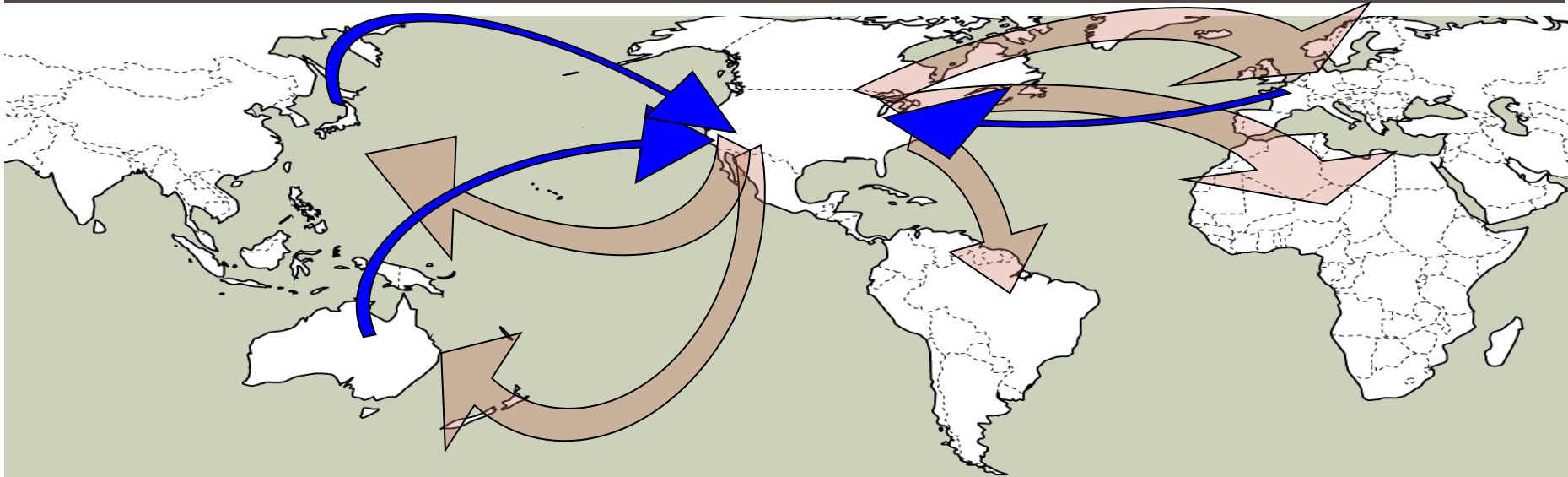
- **Contribution to safety**

- Assesses safety before product reaches border.
- Reduces number of import lines needing review, improving risk-based targeting of border inspections.

Timeline



Capacity Building



➔ Foreign Governments can be “trusted partners” for ensuring import safety

- Mutual recognition of foreign inspection reports,
- Training of foreign governments and producers,
- Acceptance of lab methods/testing.

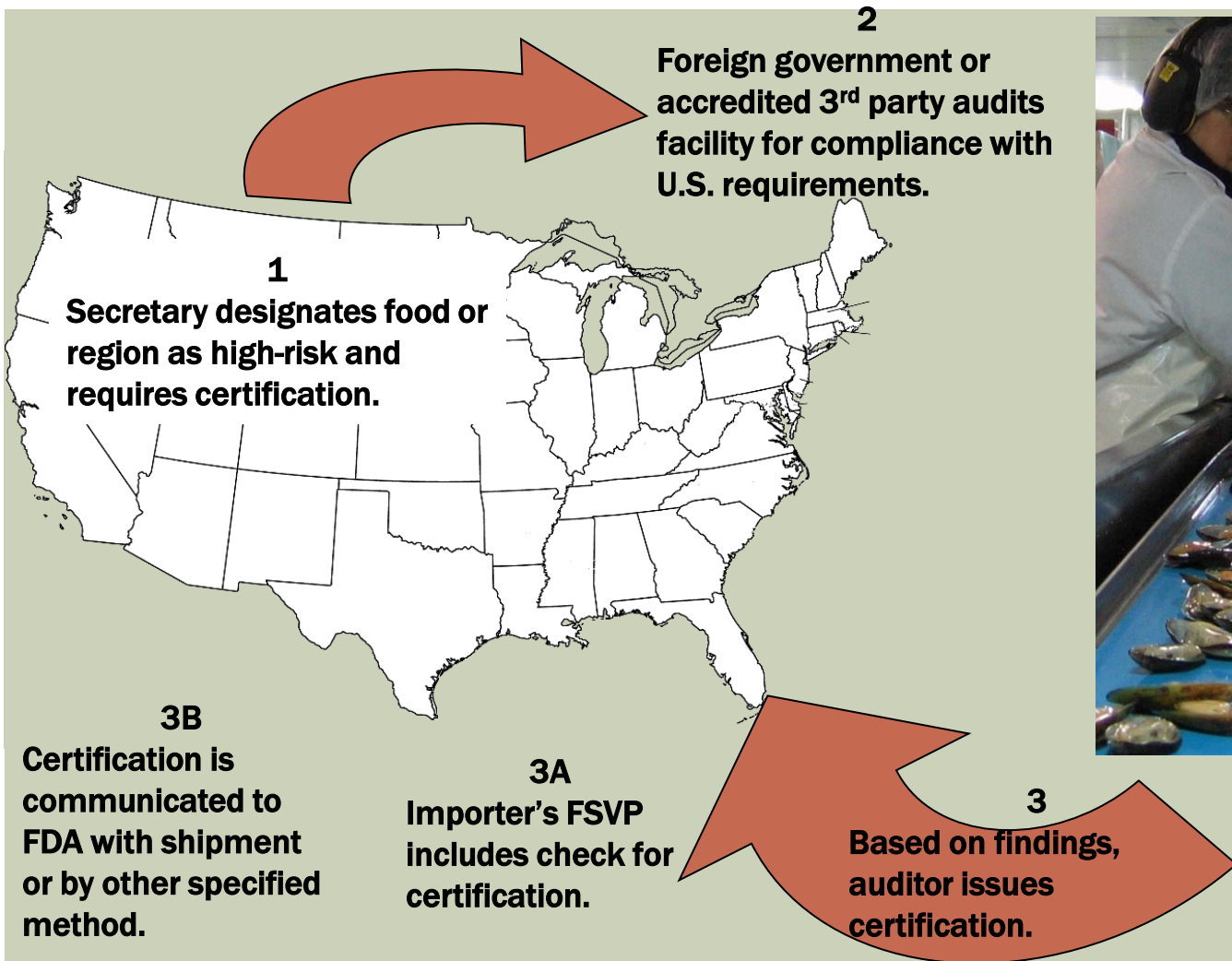
Certification

- **Certification assures**
 - High-risk imported food meets U.S. requirements
 - Food is eligible for VQIP.
- **Certification may be from government or qualified 3rd party auditor.**
- **3rd party auditors -- accredited by recognized accrediting bodies – may be:**
 - Foreign governments,
 - Foreign cooperatives, or
 - Private parties

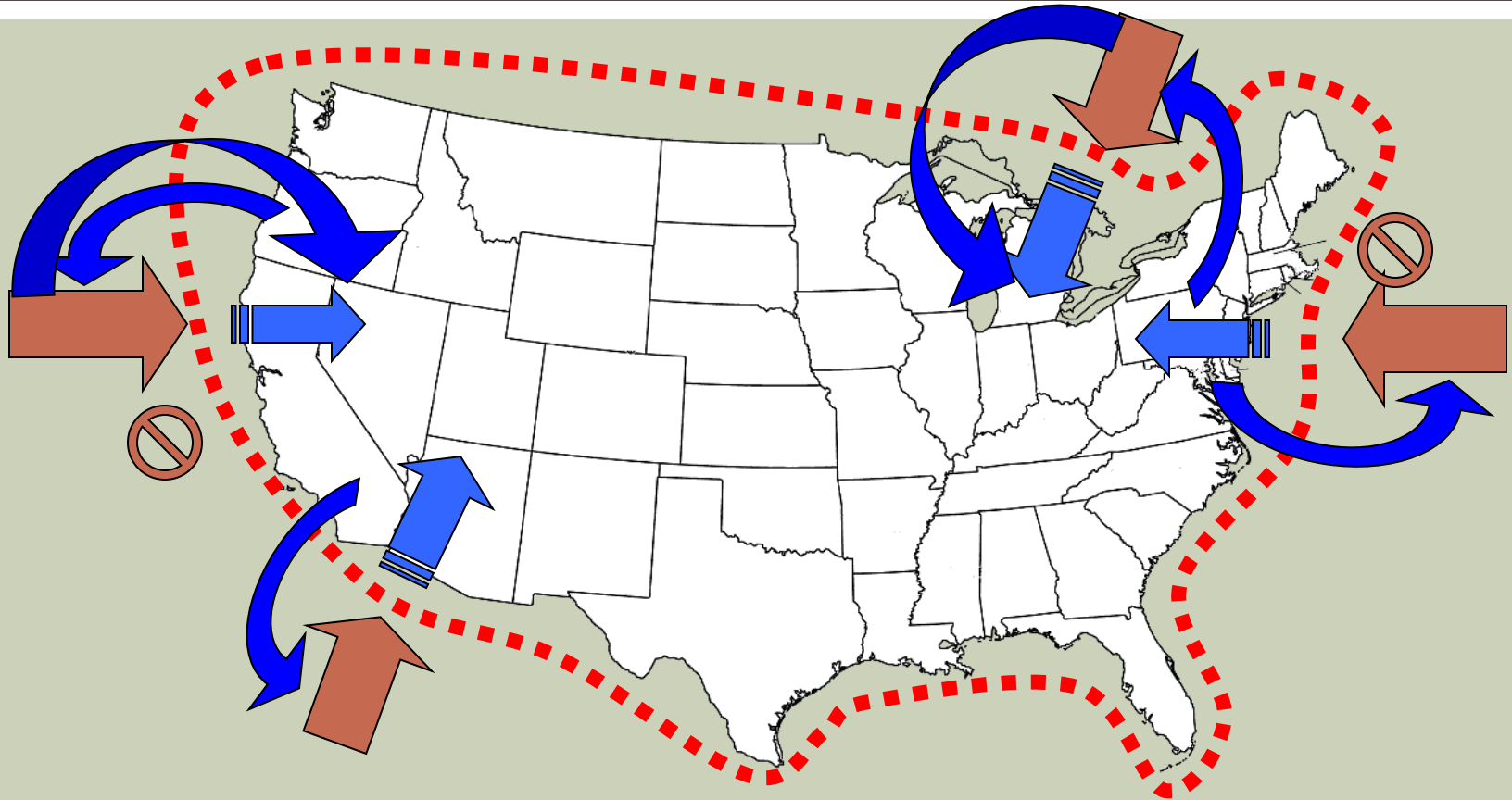
Mandatory Certification of High-Risk Foods

- FDA may require certifications of high-risk foods if there are:
 - Known safety risks associated with the food
 - Known safety risks associated with the place food originates from
 - A finding by Secretary that foreign food safety system is inadequate
 - A finding by Secretary that certification would assist border inspections

Certification: Final Check for High-Risk Food



Voluntary Qualified Importer Program



Thank you!

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