Assuring Food Safety

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Food Marketing Institute

- Non-profit trade association conducting programs in research, education, food safety, industry relations and public affairs

- Primary lobbying organization for food retailers and wholesalers in the US

- 1,500 Member Companies
  - Food Retailers (26,000 supermarkets, grocery stores)
  - Wholesalers and Distributors
  - 3/4 of all food retail store sales in the US ($680 billion annual)
  - Large multi-store chains, regional firms and independent supermarkets
  - International: 200 companies in 60 countries

- Associate members (suppliers, service providers)

- FMI owns and manages the SQF Program
FMI Mission Statement

Representing food retailers and wholesalers, FMI develops and promotes policies, programs and forums supporting its members, and their customers, in the areas of:

- Government Relations
- Food Safety and Defense
- Public and Consumer Information
- Research and Education
- Industry Cooperation
U.S. Government Recognition of Third Party Certifications for Food Safety

- Safe Quality Food (SQF)
- Food Safety Legislation
- Food Safety Regulation
- Benefits of A3PC and CA
President Obama’s Food Safety Working Group

3 core principles:

1. Prioritize Prevention
2. Strength surveillance & enforcement
3. Improve response and recovery

www.foodsafetyworkinggroup.gov
What is SQF?

- SQF = A globally recognized conformity assessment program for food safety, quality and ethical sourcing.

- SQF Program contains two parts:
  - A food safety standard
  - A system for auditing and certification

- The **standard** includes all the regulations and best practices for how to safely grow, process, manufacture and prepare food from farm to table.

- The **system** ensures that a qualified, trained independent auditor evaluates how well a supplier meets the standard and to certify that the standard is being met.
FDA Food Safety Modernization Act
Food Safety Enhancement Act

Congress proposed new food safety legislation
- S.510
- HR 2749

Retail food industry supports the new legislation
- Food safety plans (HACCP)
- Regulatory Standards for Fruits and Vegetables
- Risk-based inspection
- Traceability
- Recall authority
- Foreign Supplier Verification Program
- Accredited third-party certification
Foreign Supplier Verification Program

VERIFICATION REQUIREMENTS:

- FDA will have one year to develop regulations
- Program will be implemented in 2 years

- Require risk-based activities for the purpose of verifying that the imported food
  - is produced in compliance with US requirements
  - is not adulterated
  - Is not misbranded
Foreign Supplier Verification Program

Verification procedures may include:
- monitoring records for each shipment
- lot-by-lot certification of compliance
- annual on-site inspections
- checking the HACCP and risk-based preventive control plan
- periodically testing and sampling shipments
As a condition of granting admission to an article of food imported or offered for import into the US, FDA may require:

- A certification of compliance
- Shipment-specific certificate
- Inclusion on a list of certified facilities
Voluntary Qualified Importer

“...to provide for the expedited review and importation by importers who voluntarily agree to participate...”

- FDA will establish a process for the issuance of a facility certification to accompany food offered for importation providing assurance that the food meets FDA requirements
- Application process and guidance document
Certification

So how do you get one of these certificates?

- An agency or a representative of the government of the country from which the article of food originated
- Such other persons or entities accredited to provide such certification according to this Act
- Goal: Make SQF a recognized entity
Third Party Auditing

- The term ‘third party auditor’ means a foreign government, agency of a foreign government, foreign cooperative, or any other third party, eligible for accreditation (CAB)
- ‘Regulatory audit’ means an audit to determine whether such entity is in compliance and therefore the an article of food is eligible to receive a food certification or the facility is eligible to receive a facility certification
Accreditation

- In 2 years, FDA should establish a system for recognition of accreditation bodies.
- FDA shall develop model requirements for third-party auditors and audit reports.
- Look to standards already in place for guidance to avoid unnecessary duplication of efforts and costs.
- FDA may also “accredit” third party auditors (?).
Types of “Auditing” Bodies

- FDA may determine that a foreign government or agency of the foreign government can provide certification of compliance.
- To be an accredited “third-party auditor” the accreditation body shall perform reviews and audits of the training and qualifications of the auditors who conduct such reviews.
- FDA may conduct on-site visits to assess the third party auditor (CAB).
Requirements of Third Parties

- If, at any time during an audit, an auditor discovers a condition that could cause or contribute to a serious public health risk, the auditor shall immediately notify FDA.
- Strict conflict of interest rules.
- Annual re-certification of entities.
- Publicly available registry.
- Must issue a written and/or electronic food certification or facility certification.
FDA Comment on Use of A3PC

Guidance for Industry Voluntary Third-Party Certification Programs for Foods and Feeds (January 2009)

“…voluntary certification is one way to ensure products meet US safety and security standards and allow Federal agencies to target their resources more effectively.”
Benefits of Certification

- FDA may use certification status as one way to determine inspection priorities
- Certification may reduce the “risk” status of a facility
- Imported foods qualify for expedited entry into the US
- Qualify for “Voluntary Qualified Importer Program”
- Faster outbreak follow-up investigation and “release”
- Remove company from “Alert” list for import detention
- Reduce costs
- Level the playing field
Outstanding Issues

- Accreditation of entities that are not Certification Bodies or Conformity Assessment Bodies
- Unannounced audits
- FDA access to audits and certification reports
- Immediate notification of FDA if “reasonable probability” that food will cause a serious health consequence or death
- Immediate notification of FDA if certification is withdrawn
- CAB has access to laboratory services for sample analysis
New Regulations and Legislation

- Encourage **collaboration**
- Build more public-private **partnerships**
- Focus more on **prevention** so we need less reaction
- Restore consumer **confidence**
- Enhance government **credibility**
What About the Eggs?

SQF 1000
GAP

SQF 2000
GMP

Retail/Food Service