

GMA

Representing the Makers of the World's Favorite Food, Beverage and Consumer Products



Private Sector Perspectives: Collaboration Advances Food Safety

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www.gmaonline.org

Presentation Overview

- GMA Background
- Science-based Standards
- Stakeholder Participation in U.S. Policymaking
- FSMA: A Case Study
- Codex and the Private Sector

Who We Are: More Than 100 Years of Industry Advocacy

GMA

Founded in 1908 and based in Washington, DC, GMA is an active, vocal advocate for its member companies and a trusted source of information about the industry and the products consumers rely on and enjoy every day.

The association and its member companies are committed to meeting the needs of consumers through product innovation, responsible business practices, and effective public policy solutions developed through a genuine partnership with policymakers and other stakeholders.

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GMA Objectives and Core Principles

Objective: Support a regulatory and commercial environment that enables our members to succeed.

GMA Strategic Areas of Focus

Product
Safety

Health &
Well-Being

Sustainability

Pro-Growth
Environment

Value
Chains

Core Principles

Member-
Driven

Values-
Based

Solution-
Focused

Our People are
Our Best Asset

GMA Member Companies



*Represents a sample of GMA members

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GMA – Global Focus

Area of Focus	Platforms for Engagement
Product Safety	APEC (FSCF, PTIN) GFSP Science Training Codex (ICGMA, FICC), ISO
Health and Wellness	APEC (advertising) LAWG WHO, FAO, Codex
Trade Liberalization and Regulatory Coherence	U.S. Trade Advisory Committees APEC (GRP, Export Certificates, etc.) WTO, Codex, ISO Trade Negotiations

U.S. government, bilateral, and multilateral advocacy

How We Engage: Flexible, Inter-related Approaches

With the U.S. government:

Communication with U.S. agencies, embassies,
Congress

Within/across industry:

Coordination with other U.S. stakeholders and
counterpart associations overseas

With Codex:

As Secretariat of the International Council of Grocery
Manufacturers Associations (ICGMA)

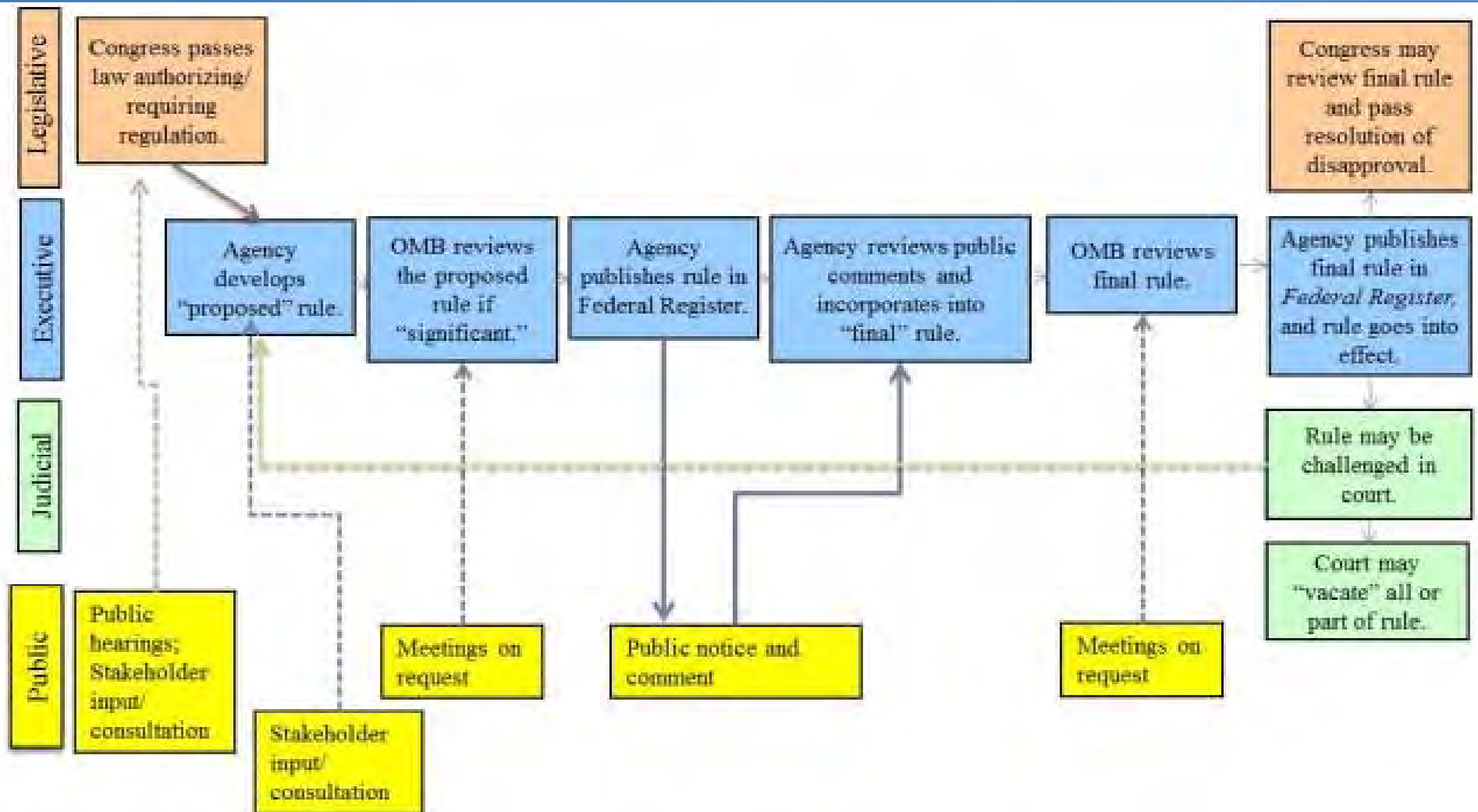
U.S. System: Basic Overview

- Powers of the Federal government are distributed among three branches
 - **Legislature/Congress** (laws)
 - **Executive/President** (regulations)
 - **Judicial/Supreme Court** (interpretation/adjudication)
- No branch has total authority
- Executive Branch authorized to develop “implementing regulations” for most laws

APA Rulemaking

- Administrative Procedures Act (APA) requires all U.S. regulatory agencies to consult with public when implementing most laws
- Consistent and transparent process for soliciting and responding to stakeholder input
- International stakeholders are encouraged to participate

Basic APA Rulemaking Process



Science-based Standards: A Critical Foundation of Policymaking

- Regulators and the U.S. food industry share a **common goal - ensure safe food**; science-based standards are essential to our common goal
- U.S. food industry has a long-standing commitment to providing safe, high quality food
- Federal law requires U.S. agencies to use science-based risk assessments
- Government and industry work together to conduct risk assessment and develop standards

Advantages of Science-based Standards

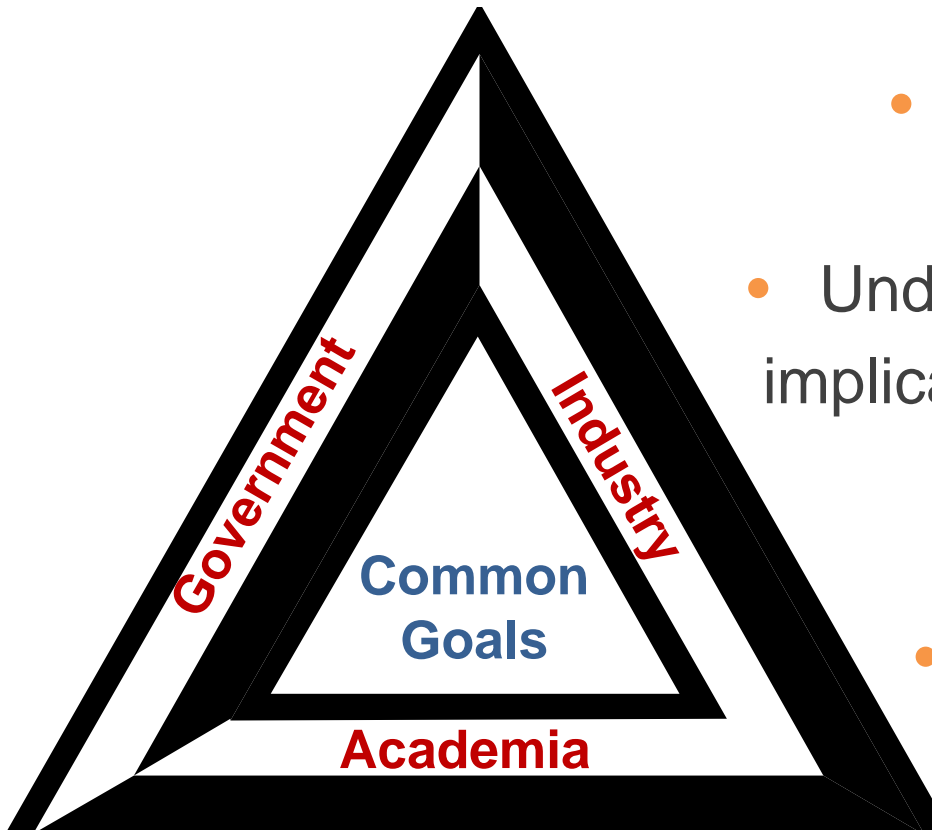
- Protect consumers
- Reduce uncertainty/assumptions
- Reflect current scientific consensus
- Foster collaboration
- Enhance transparency
- Facilitate international trade

Advantages realized through collaboration

Private Sector Contributions

- Scientific and technical data used for risk assessment
- Practical implementation/best practices that help to facilitate compliance
- Estimates of costs of implementation to determine cost-benefit calculations
- Alternatives to achieve the intended goals
- Unintended consequences to economy, environment, workforce, etc.
- Perspective on global supply chain and trade

Science-based Standards-The Role of the Private Sector



- Scientific data and expertise
- Understanding practical business implications and costs of legislation and regulation
- Cross-cutting awareness of potential impact on trade and value chains

Stakeholder Participation in Policymaking Outside APA

- U.S. Trade Advisory Committees
- Meetings with U.S. officials
- Congressional Oversight
- Legal Challenges
- WTO Notifications
- Embassy Outreach
- Regional Body Engagement
- Capacity Building Programs
- Codex Engagement

Example: U.S. Food Safety Modernization Act (FSMA)

Signed in 2011. Most significant U.S. food safety reform in 70 years

FSMA:

- Places new responsibilities on companies – will significantly impact daily operations and supply chain management.
- Creates new controls for imported food
- Enhances FDA's enforcement abilities

FSMA industry-regulator dialogue



Face to Face Meetings
with FDA and Subject
Matter Experts from
industry

FDA Public
Meetings

Comments
to Public
Dockets

Collaborative
Meetings with
GMA FSMA
Coalition
(including other
trade
associations),
Foreign
Delegations and
Embassies

FSMA: The Value of Dialogue

- Built task force of more than 750 company experts and external coalition of more than 175 other stakeholders to effectively communicate with regulators.
- Constructed information-sharing tools (e.g., Sharepoint)
- Participated in more than 100 meetings with FDA subject matter experts and other stakeholders
- Submitted more than 1000 pages of written comments, including technical, economic, and legal analysis
- Final rules are more flexible and risk based, and we estimate first year implementation will be \$18 billion less burdensome

FSMA: The Value of Dialogue (contd.)



Codex Process and the Private Sector

Goal: Develop science-based standards and guidelines that promote a safe food supply and to facilitate trade

Strategy: Include national governments, private sector and civil society in transparent setting process

Value: Safe food supply and improved trade environment based on inclusive, consensus based process that is globally applicable

Observer Participation in Codex

- Accredited Observer organizations participate in Codex meetings, working groups and submit written comments
- Organizations apply for accreditation and must contribute to Codex process
- Observers provide data, technical expertise, practical knowledge, etc.
- Representation is broad, including civil society, industry, scientific and standard setting bodies
- 219 Codex Observers, 147 NGOs

U.S. Codex Process-Inclusive Model

USDA maintains U.S Codex Office-oversees U.S. Codex strategy and formulates U.S. positions for Codex Meetings

- Public meetings
- Draft U.S. positions

U.S. Codex Office prioritizes input and expertise from private sector

GMA Participation in Codex

- GMA participates in Codex via the International Council of Grocery Manufacturer Associations (ICGMA)
- Members include GMA Counter Parts in Argentina, Australia, Brazil, Chile, Mexico, New Zealand, South Africa, United Kingdom



GMA Participation in Codex

ICGMA Mission:

- Advance science-based international standards in Codex Alimentarius by
 - Promoting harmonization within Codex standards and policies, and
 - Facilitating international trade
- GMA works closely with members and ICGMA members to develop positions reflective of global consensus

ICGMA Contributions to Codex

- Data for risk assessment
- Assessment of commodities/products in international trade
- Practical knowledge about production methods and technical issues
- Best-practices and industry standards
- Technical and scientific network of experts
- In capital support of Codex and funding
- Promotion of Codex mission and harmonized standards

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Thank you

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