

Action Plan for Import Safety

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Background

- Written by the Interagency Working Group on Import Safety
 - Developed by twelve US government departments, agencies and CPSC
- Submitted to the President November, 2007
- Designed as a roadmap for continual improvement
 - 86 pages with 14 broad recommendations and 50 action steps

Vision and Strategy

Vision: Continuously improve the safety of imported products

Strategy: Shift focus from intervention to prevention based upon three Principles:

- 1) prevention, 2) intervention and 3) response

Building Blocks

Within each of the organizing principles are six cross-cutting building blocks:

1. Advance a Common Vision
2. Increase Accountability, Enforcement and Deterrence
3. Focus on risks over the life cycle of an imported product
4. Build interoperable systems
5. Foster a culture of collaboration
6. Promote technological innovation and new science

Shifting Focus

Shifting from intervention to a prevention with verification, risk-based approach that builds safety into the products can occur by following 14 recommendations:

1. Safety standards: create new and strengthen existing standards
2. Certification: verify compliance of foreign producers through certification
3. Good Import Practices: promote good importer practices
4. Penalties: Strengthen penalties and enforcement
5. Foreign Collaboration and Capacity Building: make product safety an important principle of our diplomatic relationships with other nations
6. Common Mission: harmonize federal government procedures and requirements
7. Interoperability: complete a single window interface for intra / interagency and private sector exchange of import data
8. Information Gathering: create an interactive import – safety information network
9. New Science: expand laboratory capacity and develop rapid test methods for swift identification of hazards
10. Intellectual Property Protection: strengthen IPR to enhance consumer safety
11. Recall: maximize effectiveness of product recalls
12. Federal – State Rapid Response: maximize federal and state collaboration
13. Technology: expedite consumer notification of product recalls
14. Track – and – Trace: expand use of electronic track and trace technologies

Current State

- While focused on products imported into the US, this action plan may also serve as a roadmap for US products that are exported to other nations
- AIAG and others in US manufacturing have been considering how to use a rational, risk-based due diligence process for REACH
 - Near-term efforts for REACH may provide an opportunity for industry to be proactive for overall supply chain due diligence

Key Quotes from the Action Plan

- “Establish third-party certification”
- “Make available information about certified firms and importers who only use certified firms”
- “Enhance field laboratory capacity”
- “Extend mandatory manufacturer / importer certification requirement..... to all statutes administered by Consumer Product Safety Commission (CPSC)”
- “In the CPSC’s experience, requiring the certification of conformity improves supplier compliance with mandatory standards.”
- “As appropriate, certification would include periodic on-site inspections and random testing.”
- “...the Action Plan recommends mandatory certification for select high-risk products.”
- “The Action Plan also recommends expanded use of voluntary import certifications for other products..... For this reason, we propose incentives to motivate voluntary participation.”

Threats and Opportunities

- The Action Plan might be viewed as early detection for a future tsunami. It is the considered opinion of the ANSI Federation that the toy and food industries are only the beginning of what will surely be increased public demand for manufacturers to demonstrate that their products are safe and conform to standards and regulation.
- If industry does not create its own reasonable approach it is reasonable to expect that some other manufacturing sector will be in the public eye in the future with continued intervention from governments.
 - It is also reasonable that other governments may emulate the Action Plan for products imported into their country.

Recommendation

- Continue work on a practical due diligence process for REACH bearing in mind the thinking detailed in the 86 page Action Report