Implementation of FSMA: The International Perspective

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Current Problems in Global Supply Chain for Enforcement of FSMA

- Regulatory gaps for mitigating risk, protecting consumer health, and raising consumer confidence
- Inability to handle emergency contamination issues consistently and reliably
- Absence of uniform treatment of domestic and international product
- Frequently less reliable technologies for tracing and certification from point of origin in foreign supplier markets
- Concerns regarding independent, verifiable certification on-site (i.e., “third party audits”) and in shipment documentation
- Potential for fraud/gaming the system
- Absence of harmonized standards with international acceptance
- Need for private-public platforms as hosts for information sharing and collaboration
- Lack of equivalency in regulatory systems worldwide
Key FSMA International Provisions

- Sanitary transportation of human and animal food
- Focused mitigation strategies to protect food against intentional adulteration
- Accreditation of third-party auditors
- Foreign supplier verification programs
- Preventive controls for food for animals
- The produce safety rule
- Preventive controls for human food
Status Report of Implementation:

- FDA faces court imposed deadline of June, 2015, to publish regulations, creating uncertainties for producers and manufacturers.
- FDA budgetary constraints undermining long-term effectiveness of FSMA.
- Continuing and potentially growing discord in grower/manufacturer/ and international supplier communities.
International Footprint

Commercial Stakes

- U.S. Food Manufacturers
- Foreign Suppliers
- Global Supply Chain Intermediaries Worldwide
- Consumer Health & Confidence
Trade and National Security Interests

- Pathogen viruses and fraud are disruptive to international trade
- Security concerns relating to undetected viruses
- Potential for international misunderstanding and weakening the fabric of international organizations and standards
  - HACCP
  - Codex Alimentarius
The Role of a Public-Private Platform

- Information exchange

- Joint venture investment in new food safety technologies
  - SPS (Phytosanitary) operating systems
  - Tracing
  - Certification

- Collaboration B2B and with government regulators to insure uniform compliance with international standards and reduce incentives for fraud
GFSF Achievements and Plans

- Received USDA Grant and Chinese Government In-kind Support
- Series of International Conferences in Beijing, Shanghai, and New Zealand.
- Corporate Site Visits with GFSF Partners and Multinational Members
- Chinese Delegation Visits to the US
- Launching Online Courses on Food Safety for Chinese Companies and Government Regulators
- Launching a Food Safety Liability Insurance Product for Recall and Contamination in China Trade
What GFSF Can Do for U.S. Products

- GFSF received a USDA grant in recognition of the role it provides in promoting the brand of US food safety and quality for its food and commodity exports
- B2B collaboration and intra-member coordination in global supply chain management
- Harmonization of standards
- Self-regulation
- A forum for dialogue and policy formulation between industry and government regulatory agencies
- A platform for government regulatory agencies to broaden and widen their outreach and achieve greater and more uniform compliance
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