

**A COMMITMENT TO CONSUMERS TO ENSURE THE SAFETY
OF IMPORTED FOODS:
FOUR PILLARS OF PUBLIC-PRIVATE PARTNERSHIP**

Introduction

Food producers have an abiding interest in safe food. Maintaining consumer confidence in our products, our brands and our companies is the single most important goal of the food, beverage and consumer packaged goods industry, and product safety is the foundation of consumer trust. The industry devotes enormous resources toward this goal, and effective regulation and oversight by federal regulatory agencies such as the FDA are critical and complementary elements of the fabric of consumer protection.

Since the safety of the U.S. food supply is a responsibility shared by all elements of the food industry – farmers, producers of ingredients and finished products, and retailers – as well as federal and state regulatory agencies, it is necessary that each participant in the process of growing, producing, and distributing food remains knowledgeable about and attentive to the requirements of safe food and that regulatory agencies have adequate resources to help prevent problems and to address those that arise.

GMA/FPA’s “Four Pillars” proposal to improve the safety of our food imports is an integrated approach whose centerpiece is prevention. This prevention orientation would be complemented by an enhanced ability to quickly detect and address public health threats. Meeting the challenges of the modern supply chain requires additional public resources for FDA and other agencies and demands an integrated approach that leverages the significant investment of the private sector in product safety.

The proposal envisions new requirements for the food industry to assure the adequacy of foreign supplier food safety programs and new responsibilities for FDA in that regard. Other elements include a new program to help identify and prioritize imports of potential concern, new efforts by FDA to help enhance the capacity of foreign governments to prevent and detect food safety issues, improvements to FDA’s scientific capabilities and its use of information technology and a significant increase in FDA resources

The Four Pillars

Pillar One: Mandatory Foreign Supplier Quality Assurance Program – All importers of record would be obligated to adopt a supplier quality assurance program that assures that all imported ingredients and products meet FDA food safety and quality requirements. Food companies would utilize FDA guidance to adopt food safety programs and practices needed to ensure food safety, such as audits, testing, good manufacturing practices, good agricultural practices, HACCP plans, food defense programs, product management systems, and recall programs.

Pillar Two: Voluntary Qualified Importer Food Safety Program – To help prioritize FDA resources and to relieve congestion at ports, importers of record who are able and willing to meet additional standards and conditions than those utilized under Pillar One could voluntarily participate in a program entitling them to expedited entry at US borders. In addition to demonstrating the presence of well-designed and implemented food safety systems including a supplier quality assurance program, importers could agree to demonstrate a secure supply chain and conduct and share additional testing and program data with FDA. This would allow FDA to identify confidently their imports as being in compliance with U.S. regulations and allow U.S. government resources to be directed at imports more likely to pose a risk to U.S. consumers.

Pillar Three: Build the Capacity of Foreign Governments – FDA would work with foreign governments to improve their capacity to prevent and detect threats to food safety. FDA would work with foreign governments to expand training, accelerate the development of laboratories, ensure the compliance of exports with US regulations, permit appropriate FDA inspections of foreign facilities, and to ensure adequate access to data and test results conducted abroad. In addition, FDA would be encouraged to use Codex to harmonize requirements among countries.

Pillar Four: Expand the Capacity of FDA – Expanding FDA resources – including personnel, equipment, laboratory capacity, and scientific expertise – is an essential component of an effective food safety system. FDA resources have not kept pace with the demands posed by rising imports and current food safety challenges. To meet these needs, Congress must provide significant new funds to dramatically improve FDA’s analytical testing capabilities, to increase and target inspections conducted by FDA (including new resources to inspect foreign facilities) to obtain real-time test results and to enhance communications during crisis events.

The GMA/FPA “Four Pillars” proposal builds on the long history of public- private responsibilities and cooperation in ensuring food safety while providing new and innovative approaches to the latest challenges to our nation’s food safety net.