



Assuring the Safety of Imported Foods and Food Ingredients

Michael R. Taylor
School of Public Health and Health Services
The George Washington University

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The Import Challenge

- Growing volume and diversity of imports
- Weak controls in some exporting countries
- FDA's "pre-globalization" oversight system and thin resources
- Resulting loss of public confidence



Standard FDA Oversight Model

- Based primarily on port of entry inspection to detect problems
- About 1% of shipments visually inspected but only a fraction of those sampled and tested
- POE inspections partially targeted on “problem” countries and products
- But very limited foreign plant inspection and no defined responsibility for prevention by exporters or importers
- **It's a reactive system**



USDA/FSIS Oversight Model

- Grounded in comprehensive (albeit outmoded) domestic inspection mandate
- Requires
 - Equivalent inspection system and standards in exporting countries
 - Approval of exporting plants based on FSIS audit and periodic inspection
 - POE inspection by FSIS of selected shipments
- It's preventive, at least with respect to violations of U.S. standards



The Seafood HACCP Model

- HACCP requirement applies to imports
- Burden on importer to ensure HACCP compliance by –
 - Importing from countries that have equivalence agreement with FDA, or
 - Taking other “affirmative steps”
- Based on principal of prevention, but implementation constrained by resource and legal limitations



Elements of the Solution

- Private sector management of the supply chain to prevent problems
- Improved standards and oversight in the exporting country
- Improved international standard setting
- Improved U.S. oversight and enforcement based on principle of prevention



Government Role in a Prevention-Oriented Food Safety System

- Define standard of care for industry adoption of preventive measures
- Set food safety performance standards as measure of accountability
- Inspect and enforce to ensure standards are met



GMA's "Four Pillars" Are On the Right Track for Imports

- Based on importer accountability for prevention
- Harness industry expertise and capacity for supply chain management
- Provide incentives for industry adoption of "best practices"
- Recognize need to strengthen FDA authorities and resources



Interagency Working Group on Import Safety

- Initial framework report to the President on September 10
- Three organizing principles –
 - Build prevention in upstream
 - Intervene to address identified hazards
 - Respond rapidly to contain problems
- Good concepts but many details to fill in



Need for Congress to Act

- FDA's import oversight system requires complete transformation
- FDA lacks –
 - Mandate for prevention
 - Legal tools
 - Resources
- Only Congress can give FDA what it needs



Questions

Professor Michael R. Taylor
School of Public Health and Health Services
The George Washington University

mike.taylor@gwumc.edu

202-530-3922