The Food Safety Modernization Act (FSMA)

- FSMA was signed into law in 2011 and represents the first update to food safety laws in the USA since the Food, Drug and Cosmetics Act of 1938
- It's purpose is to shift the emphasis away from reacting to food safety incidents after the fact (recalls, etc.) and towards preventing of such incidents from occurring
- It does this by requiring food companies to adhere to industry best practices for identifying and mitigating food safety risks throughout their supply chains and in their facilities

The Food Safety Modernization Act (FSMA)

Current Status

1) Now in force for all registered food companies
2) Companies must identify potential threats/adulterants
3) Must implement preventive controls if a food safety threat is identified
4) Must ensure all suppliers conform to US food safety rules, including foreign suppliers
5) “Strict” legal liability for violations, including corporate executives – ignorance is not a defense!
6) Implementation to date has been uneven and very challenging
7) FDA has been very patient and accommodative – so far

FSMA – Key requirements

Covered facilities must establish and implement a food safety system that includes:

- Hazard analysis: The first step is hazard identification, which must consider known or reasonably foreseeable biological, chemical and physical hazards. These hazards could be present because they occur naturally, are unintentionally introduced, or are intentionally introduced for economic gain (if they affect the safety of the food).

What are the likely threats?

- Preventive controls: These measures are required to ensure that hazards requiring a preventive control will be minimized or prevented. They include process, food allergen, and sanitation controls, as well as supply-chain controls and a recall plan.

What are we doing to prevent them?

The Food Safety Modernization Act (FSMA)

1) Finding reliable information about likely hazards/adulterants
2) Visibility into the supply chain
    - Hundreds of ingredients
    - Hundreds/thousands of suppliers
    - Multiple countries of origin
    - Hundreds of potential hazards
3) Determining the potential safety impact of the threat

Key Challenges

Key challenges

1) Finding reliable information about likely hazards/adulterants
2) Visibility into the supply chain
    - Hundreds of ingredients
    - Hundreds/thousands of suppliers
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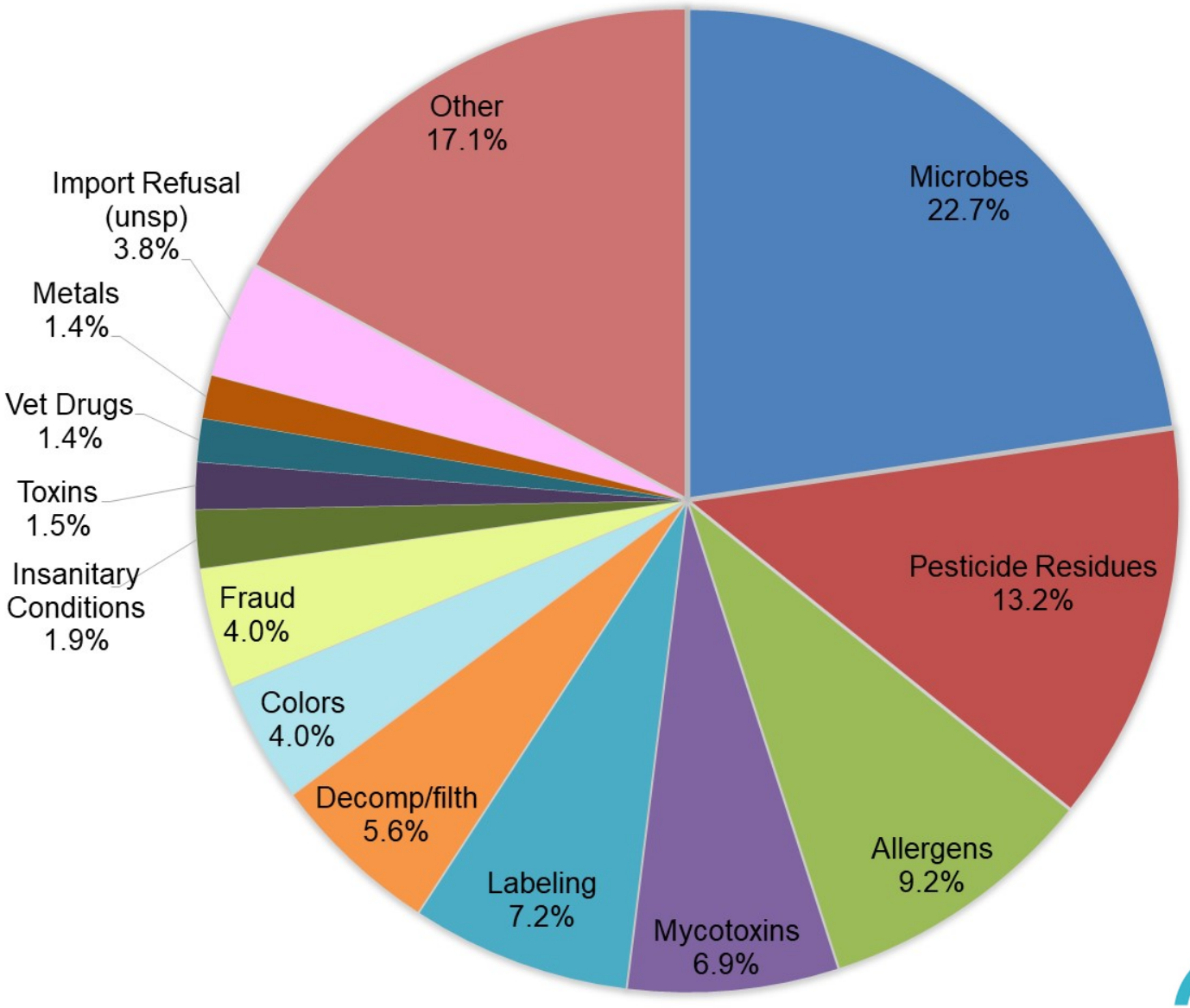

Online food hazard database

Updated daily from 100+ inspection agencies and other reliable sources

500+ commodities

180+ countries of origin

22,000+ suppliers

10+ years of history

100,000+ records

HorizonScan
GLOBAL FOOD RISK MONITORING SYSTEM

“With HorizonScan GLOBAL FOOD RISK MONITORING SYSTEM ow do in less than an hour what used to take me two weeks, and I have a far better work product to show for it. I’m ready to defend my food safety plan in front of any auditor that walks in my door.”

-FoodChain ID Client

APPENDIX

Increasing Regulation: Food Safety Modernization Act

Representing the most significant update to U.S. food safety laws since the 1938 Food, Drug & Cosmetic Act, FSMA is causing a paradigm shift in the regulatory landscape

Foreign Supplier Verification Program (FSVP)

- U.S. food importers/retailers must verify imported food has same level of protection as domestic foods
- Requires importers & retailers have full information on supply chain, and
- Implement hazard controls, including periodic auditing & review of safety records, periodic sampling & testing, and proof of compliance

FoodChain ID and SupplyTrak are adept at verifying compliance of foreign supplier chains

Preventative Controls

- Includes process, food allergen, sanitation and supply-chain controls, and recall plan
- Emphasizes industry-wide shift towards preventing food incidents
- U.S. food company employees must use FDA-approved best practices and be aware of/ report potential issues- Employees and officers of the company can be held liable for not complying

FoodChain ID Certification supplys audits / provides certifications that ensure preventative controls are in place

HorizonScan enables food companies to identify the "known or reasonably foreseeable chemical, biological and physical hazards" in their supply chains.

Produce Safety & Incident Awareness

- Standards for growing, harvesting, packing, and holding produce on domestic and foreign farms
- Requires water testing by FDA approved method, and
- Sprout testing for Listeria spp/ L. monocytogenes & irrigation water for E. coli O157:H7 and Salmonella
- FSMA requires food retailers and manufacturers keep detailed information on their product formulation and suppliers

FoodChain ID Testing tests for a range of organisms including Salmonella, E. coli, Listeria spp., Coliform, etc.