Food safety summit: Growing markets for Vietnamese products

HCMC 28/8/2017
# AGENDA

**Food Safety Training Summit: Growing Markets for Vietnamese Products**

New World Saigon Hotel, HCM City, August 28, 2017, 8:00 am – 6:30 pm

<table>
<thead>
<tr>
<th>TIME</th>
<th>ACTIVITIES</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00</td>
<td>Registration and Sponsors’ Exhibitions</td>
</tr>
<tr>
<td>9:00 – 9:05</td>
<td>Recognition of Special Guests</td>
</tr>
<tr>
<td>9:05 – 9:30</td>
<td>Opening Remarks</td>
</tr>
<tr>
<td></td>
<td>• Mr. Mark Gillin, Vice Chair, AmCham Vietnam (HCMC)</td>
</tr>
<tr>
<td></td>
<td>• Dr. Nguyen Thi Kim Tiến, Minister of Health</td>
</tr>
<tr>
<td></td>
<td>• Mr. Tran Van Tung, Deputy Minister of Science &amp; Technology</td>
</tr>
<tr>
<td></td>
<td>• Mr. Vu Van Tam, Deputy Minister of Agriculture &amp; Rural Development</td>
</tr>
<tr>
<td></td>
<td>• Mr. Tran Vinh Tuyen, Standing Member of HCMC Party Committee, Vice – Chairman of HCMC People’s Committee</td>
</tr>
<tr>
<td>9:35 – 10:30</td>
<td>Panel 1. Foreign Supplier Requirements – Advanced Regulatory Systems</td>
</tr>
<tr>
<td></td>
<td>1.1 U.S. FDA Webcast – FSVP (Foreign Supplier Verification Program) and VQIP (Voluntary Qualified Importer Program)</td>
</tr>
<tr>
<td></td>
<td>Speaker: Ms. Sharon Mayl, Senior Advisor for Policy, U.S. FDA</td>
</tr>
<tr>
<td></td>
<td>1.2 Foreign Supplier Requirements – Testing for Export to the USA</td>
</tr>
<tr>
<td></td>
<td>Speaker: Ms. Janie Dubois, Laboratory Manager, JIFSAN (Joint Institute for Food Safety and Applied Nutrition)</td>
</tr>
<tr>
<td>10:35 – 10:50</td>
<td>Coffee/Tea Break</td>
</tr>
<tr>
<td>10:55 – 11:25</td>
<td>Panel 1(a) Q&amp;A of above panelists</td>
</tr>
<tr>
<td>Time</td>
<td>Session Details</td>
</tr>
<tr>
<td>--------------</td>
<td>---------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>11:30 - 12:30</td>
<td>Networking Lunch</td>
</tr>
</tbody>
</table>
| 12:45 - 13:05| **Panel 2. Supply Chain Risk Management**  
|              | 2.1 Refrigeration Systems, Cold Chain Certification                              |
|              | Speaker: Mr. Eric Prieur, Cold Chain Sustainability Director, Carrier Transiscold |
|              | 2.2 Food Safety Detection Technologies                                            |
|              | Speaker: Mr. Vincent Paez, Director, Global Food Safety Forum                    |
|              | 3.1 Assuring Vietnam Food Safety for International Integration                   |
|              | Speaker: Ms. Tran Viet Nga, Deputy Director General, Vietnam Food Safety Agency   |
|              | 3.2 Vietnam Food Safety Management System: Current Status and Selected Institution and Policy issues  
|              | Speaker: Mr. Nguyen Do Anh Tuan, Head of the Institute of Policy & Strategy of Agriculture and Rural Development (IPSARD) |
|              | 3.3 Vietnamese Products for High Quality and International Standards              |
|              | Speaker: Mdm Vu Kim Hanh Chairwoman, Vietnam High-Quality Products Business Association |
|              | 3.4 Regional Framework for Action on Food Safety in the Western Pacific           |
|              | **Moderator: Mdm Vu Kim Hanh, Chairwoman, Vietnam High-Quality Products Business Association** |
| 14:45 - 15:30| **Panel 4 Supply Chain Risk Management – Public-Private Partnership Initiatives** |
|              | 4.1 Global Food Safety Partnership: a coordinated approach to resources, investments, actions.  
|              | Speaker: Mr. Son Thanh Vo, Senior Rural Development Specialist, World Bank Vietnam |
|              | 4.2 Industry-Government Collaboration in Vietnam                                 |
|              | Speaker: Ms. Ly Le, Legal and Public Affairs Director, Coca-Cola Vietnam         |
|              | 4.3 The Role of the Private Sector in the Regional Food Regulatory and Standards System  
<p>|              | Speaker: Mr. Steven Barthomoleusz, Head of Advocacy and Communications, Food Industry Asia |
|              | <strong>Moderator: Mr. Rick Gilmore</strong>                                                  |</p>
<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>15:35 – 15:45</td>
<td>Coffee/Tea Break</td>
</tr>
<tr>
<td>15:50 – 16:50</td>
<td><strong>Panel 5. Standards &amp; Compliance How to meet new U.S. food safety requirements</strong></td>
</tr>
<tr>
<td></td>
<td>5.1 FSMA and Imported Food - FSVP (Foreign Supplier Verification Program) and “Preventive Controls for Human Food” Course</td>
</tr>
<tr>
<td></td>
<td>Speaker: Mr. Nguyen Huy, Lead Instructor, FSPCA, Food Manager, Bureau Veritas Vietnam</td>
</tr>
<tr>
<td></td>
<td>5.2 FSVP – Empowering Vietnamese Food Industry for the new US FDA requirements</td>
</tr>
<tr>
<td></td>
<td>Speaker: Ms. Ratih Puspitasari, Director of Regulatory and Scientific Affairs, SEA and India, Cargill</td>
</tr>
<tr>
<td></td>
<td>3) Trung An Rice: Exporting to the USA</td>
</tr>
<tr>
<td></td>
<td>Speaker: Mr. Pham Thai Binh, Director of Trung An Rice</td>
</tr>
<tr>
<td></td>
<td><strong>Moderator: Mr. Rick Gilmore</strong></td>
</tr>
<tr>
<td>16:55 – 17:10</td>
<td><strong>Closing Keynote Address</strong></td>
</tr>
<tr>
<td></td>
<td>GAP (Good Agriculture Practices): The Critical First Link in the Global Supply Chain</td>
</tr>
<tr>
<td></td>
<td>Speaker: Mr. JongHa Bae, FAO Vietnam Country Representative</td>
</tr>
<tr>
<td>17:15 – 17:30</td>
<td><strong>Recognition of Sponsors</strong></td>
</tr>
<tr>
<td>17:30 – 18:30</td>
<td><strong>Networking Reception</strong></td>
</tr>
</tbody>
</table>
In 2013, we in AmCham organized a number of seminars with Vietnamese business associations, including VCCI and the Leading Business Club, to help increase understanding of and support for the TPP in the Vietnamese business community.

One of our partners at that time was Mr. Van Duc Muoi, then Chairman of VISSAN, and the HCMC Food Association. He had studied the TPP very carefully, and was a frequent commentator on the issue in TV programs, seminars, and media interviews. He usually concluded his remarks by saying that the TPP commitments on food safety, SPS (Sanitary and Phytosanitary) and TBT (Technical Barriers to Trade) would be very difficult for Vietnam’s agriculture and food products sector; however, overall, TPP would be positive for Vietnam’s agriculture and food sector, provided that the developed countries in TPP would give technical assistance to Vietnam in food safety.

Unfortunately, the TPP is now on the “back burner,” but we can still achieve some of the TPP objectives, including technical assistance in food safety.

So we in AmCham are pleased to co-organize this Food Safety Summit in cooperation with the High Quality Vietnam Products Business Association, the Global Food Safety Forum, the Ministry of Science and Tecnology, with participation of the Ministry of Health, the Ministry of Agriculture and Rural Development, with support from USAID and from leading firms in the sector such as Cargill Vietnam, Coca-Cola, and VinECO, and others whose logos you see on the backdrop.

This information-sharing event is the beginning of our effort to support cooperation between businesses and food safety regulatory authorities in both countries, and we hope it will lead to formal government-to-government cooperation and an extensive technical assistance program, as Mr. Van Duc Muoi suggested.

The agriculture, fisheries, and food sector accounts for 46% of Vietnam’s workers, and a significant amount of Vietnam’s exports. Seafood alone accounted for $7 billion of Vietnam’s exports in 2016. However, with new regulations for food safety imports, based on the Food Safety Modernization Act, and the shift in responsibility for catfish imports inspections from FDA to USDA, we in AmCham were concerned that a lack of awareness of the new regulations might result in a significant decrease in Vietnam’s agriculture and food exports to the U.S., and a similar decrease of employment and incomes in the sector.

For example, in December 2016 there were 1,845 food facilities in Vietnam registered with the FDA to export to the U.S. But in January 2017, this number dropped to 806. Under the new regulations, all registered facilities are required to renew their registration every two years, starting in 2016, between Oct 1 and Dec 31. However, more than 1,000 Vietnamese
companies were not aware of this new requirement, did not renew their registrations, and were dropped from the list, and so, they could not export to the U.S.

With the Food Safety Modernization Act, there are a lot of new requirements. Speakers today will provide an overview of the changes, and will also provide practical information on how Vietnamese companies can comply with the new food safety requirements, so as to maintain a healthy trade in agriculture and food products between our two countries.

Thank you for joining us. And I wish all of you health, happiness, and success in this conference and in your trade with the U.S.
PANEL 1

Foreign Supplier Requirements -
Advanced Regulatory Systems

PHIỆN 1

Yêu cầu đối với Nhà cung cấp nước ngoài –
Hệ thống quy định nâng cao
Final Rule on Foreign Supplier Verification Programs

http://www.fda.gov/fsma

Key Principles of FSVP Rule

- Requires importers to share responsibility for ensuring safety of imported food
- Risk-based (according to types of hazards, importers, and suppliers)
- Flexibility in meeting requirements (assessing activities conducted by others)
- Alignment with PC supply-chain provisions
Purpose of FSVPs

• To provide adequate assurances that:
  – Foreign suppliers produce food using processes and procedures providing same level of public health protection as FSMA preventive controls or produce safety provisions
  – Food is not adulterated or misbranded (as to allergen labeling)

Who Must Comply?

• “Importer” is U.S. owner or consignee of a food at time of U.S. entry
• If no U.S. owner or consignee at entry, importer is U.S. agent or representative of the foreign owner or consignee, as confirmed in signed statement of consent
Exemptions from FSVP

- Firms subject to juice or seafood HACCP regulations
- Food for research or evaluation
- Food for personal consumption
- Alcoholic beverages and ingredients (when importer uses them to make an alcoholic beverage)

FSVP Exemptions (cont.)

- Food transshipped through U.S.
- Food imported for processing and export
- “U.S. food returned”
- Meat, poultry, and egg products subject to USDA regulation at time of importation
Importers in Compliance with Preventive Controls

- Importers are deemed in compliance with most of FSVP when they:
  - Comply with PC supply-chain provisions
  - Implement preventive controls under PC regulation for hazards in food they import
  - Are not required to implement a preventive control under certain PC provisions

Use of Qualified Individuals

- Must use a *qualified individual* to perform all required FSVP tasks
  - Must have education, training, or experience (or combination thereof) necessary to perform the activity
  - Must be able to read and understand the language of any records reviewed in performing an activity
Hazard Analysis

- Evaluate known or reasonably foreseeable hazards to determine if they require a control
  - Biological, chemical (including radiological), and physical hazards
  - Naturally occurring, unintentionally introduced, or intentionally introduced for economic gain
- May assess another’s hazard analysis

Evaluation of Food and Foreign Supplier

- To approve suppliers and determine appropriate supplier verification activities
- Consider:
  - Risk posed by the food (hazard analysis)
  - Entities controlling hazards or verifying control
  - Supplier characteristics (procedures, processes, and practices; FDA compliance; food safety history)
Supplier Verification Activities

- Procedures to ensure food is obtained from approved suppliers
- May use unapproved suppliers on temporary basis when subject food to verification
- Written procedures for verification activities

Verification Activities (cont.)

- Determine appropriate verification activities (and frequency) based on food and supplier evaluation
  - Activities may include: onsite auditing; sampling and testing; review of supplier records; other appropriate measures
- Annual onsite auditing is default approach when a food has a SAHCODHA hazard
Reliance on Verification Activities Conducted by Others

- May rely on another entity’s determination or performance of appropriate verification activities (e.g., farm audits conducted by produce distributor)
- Must review and assess results of verification activities (importer’s own or others on which it relies)

Verification Activities (cont.)

- Onsite audits:
  - Must be conducted by “qualified auditor”; may be government employee
  - Consider applicable FDA food safety regulations
  - Substitute results of inspection by FDA or other entities
Other Circumstances

- Food cannot be consumed without application of control (e.g., coffee beans)
- Hazard controlled by importer’s customer or subsequent entity in U.S. distribution
  - Disclosure statement
  - Written assurance
- Importer establishes other system to ensure control of hazard at subsequent distribution step

Other FSVP Requirements

- Corrective actions
- Importer identification at entry
- Recordkeeping
Modified FSVP Requirements

- Dietary supplements
- Very small importers and importers of food from certain small foreign suppliers
- Certain food from suppliers in countries with comparable or equivalent food safety systems

Compliance Dates

- Importers will be required to comply with FSVP no earlier than 18 months after issuance of final rule (i.e., May 2017)
- If foreign supplier is subject to preventive controls or produce safety regulations, importer must comply with FSVP 6 months after supplier must comply with the relevant regulations

“Note: In August 2016, FDA extended compliance dates for certain provisions of the rule.”
Guidance and Outreach

- Developing FSVP draft guidance for industry
- Food Safety Preventive Controls Alliance will develop course materials for FSVP
- FDA Technical Assistance Network
- Webinars and meetings

Voluntary Qualified Importer Program

http://www.fda.gov/fsma
Voluntary Qualified Importer Program (VQIP)

- FDA required to establish a program to provide for the expedited review of food imported by voluntary participants.
- Participation is limited to importers who meet all eligibility criteria, including offering food from a facility certified under FDA’s accredited third party program.

Definition of VQIP Importer

- Section 806(g) defines “importer” as “the person that brings food, or causes food to be brought, from a foreign country into the customs territory of the United States.”
  - Can include manufacturers, consignees and importers of record for food for humans and animals
  - May or may not be the FSVP importer
Draft Benefits of VQIP

- Expedited entry into the U.S.
- Examination and/or sampling generally limited to “for cause” situations
- Any sampling or examination done at location chosen by the importer
- Expedited laboratory analysis if sampled
- VQIP Importers Help Desk
- FDA will post approved VQIP importers, if desired

Draft VQIP Guidance
Eligibility Criteria

- Quality Assurance Program (QAP)
- Assurance of compliance with the supplier verification and other importer responsibilities under the applicable FSVP or HACCP regulations
- Current facility certification, including farms, issued under FDA’s Accredited Third-Party Certification regulations for each foreign supplier of food in VQIP
Draft VQIP Guidance
Eligibility Criteria (cont.)

- 3+ year history of importing food to the United States
- No ongoing FDA administrative or judicial action (e.g., import alert, injunction, recall), or other history of non-compliance with food safety regulations by the importer, other entities in the supply chain (e.g., foreign suppliers, filers/brokers, and FSVP and HACCP importers), or food

Timing of VQIP Program

- Final Guidance issued November 2016
- A formal Fee will be published no later than August 1, 2018
- Anticipate first applications January 1, 2018
- Anticipate first benefit period to begin October 1, 2018
Foreign Supplier Requirements – Testing for Export to the USA

JIFSAN: An FDA Center of Excellence
Janie Dubois, PhD
Laboratory Program Director

Outline

1. Review of responsibilities
2. Some common misconceptions
3. Laboratory testing: Role and implications
4. Certification and compliance for laboratories
Review of Responsibility

Good Agricultural Practices
Current Good Manufacturing Practices
Supply chain traceability
Importer

Importer Responsibility (in a nutshell)

• Select the food = Knowing the (potential) hazards
• Select suppliers = Knowing their processes
• Evaluate risk = Hazards + Supplier(s)
  – Define supplier verification activities that THEY perform
  – Conduct supplier verification activities (or delegate)
  – Apply corrective actions (measure that they actually correct the problem!)
• Maintain (and follow) their own written procedures (FDA may ask to see these)
Some Common Misconceptions

- FDA inspects suppliers
- FDA has HACCP guidelines for all foods
- FDA approves suppliers
- FDA tests food shipments at the point of entry
- FDA requires an export certificate
- What happens when contaminants are found in a shipment

Role of Laboratory Testing in FDA

- Lab testing is a way to VERIFY that preventive controls and monitoring activities are effective
  - Why?
    - You can’t test everything for every potential contaminant
    - Results have an uncertainty associated (false +/-)
    - It would be too expensive
- We test agricultural commodities (ingredients) rather than finished products
  - Corrective actions can be put in place
  - Less loss ($$)
Implications of Lab Testing

- Testing implies investing A LOT OF MONEY
- You need to maintain a trained analytical team
- Training these groups is easier and cheaper...

Lab Certification

- FDA had an option to define a certification plan, but did not.
- By default ISO 17025
  - FDA (and State) labs were not accredited until recently... -$50M was needed
- Customers drive the selection of accreditation
  - For gov. labs, customers can be
    - Gov. itself (brand preservation)
    - Foreign gov. when certificate of analysis required
    - Industry if testing is a requirement for market access
Some Requirements

• Use of validated methods
• Method verification (single lab validation)
• Meets performance requirements for contaminant/commodity

Difficulties often encountered
• No validated methods for finished foods
• Requirements vary for different countries

Networking typically difficult
Some Tools Available

- Capacity building initiatives (e.g. APEC FSCF, World Bank GFSP) and projects (e.g. IAEA/FAO, UNIDO)
- Private laboratories
- Regional/country accreditation bodies and associated consulting services
- Contaminant/technology specific training

FSMA’s Impact on Lab Requirements

- In reality, FSMA does not specify any data requirements, gives responsibility to importer
- In practice, importer want the data for their foreign supplier verification program
- Larger corporations want data to protect their brand
- Governments also want to protect “brand” and impose lab testing
- Larger importers delegate the work of verification through for e.g. private standards and third party audits/tests
WHAT IS FSMA?

Signed into law by President Obama January 4, 2011, FSMA aims to ensure the U.S. food supply is safe by shifting the focus from responding to contamination to preventing it, hence strengthening the food safety system.

<table>
<thead>
<tr>
<th>7 Rules of FSMA</th>
<th>Manufacture, Processing, Dist'n Centers &amp; Warehouses - Human Food</th>
<th>Manufacture, Processing, Dist'n Centers &amp; Warehouses - Animal Food</th>
<th>US Importers of Human &amp; Animal Food</th>
<th>Produce Farms</th>
<th>US Shippers, Carriers, Receivers of Human &amp; Animal Food</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preventive Controls for Human Food (PCHF)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Preventive Controls for Animal Food (PCAF)</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Foreign Supplier Verification Program (FSVP)</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Produce Safety</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Sanitary Transportation (US)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Intentional Adulteration (Food Defense)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Third Party Accredited Certification rule</td>
<td>X</td>
<td></td>
<td>(VQIP)</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Source: FDA
## COMPLIANCE TIMELINES

<table>
<thead>
<tr>
<th>Rule</th>
<th>Issue Date</th>
<th>Requirement</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preventive Controls for Human Food</td>
<td>Sept 17,2015</td>
<td>1 year after final rule-General</td>
<td>Sept 19,2016, Sept 18,2017,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 years after final rule-small business*</td>
<td>Sept 17,2018</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 years after final rule-very small b(&lt;1 M)+Pasteurized milk ordinance</td>
<td></td>
</tr>
<tr>
<td>Preventive Controls for Animal Food</td>
<td>Sept 17,2015</td>
<td>CGMP compliance date</td>
<td>Sept 19,2016, Sept 18,2017,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 year after final rule-General</td>
<td>Sept 17,2018</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 years after final rule-small business*</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 years after final rule-very small b(&lt;2.5M)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>PC compliance date + 1 year from above. Subpart E (Supply chain program</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>requirements) apply as well.</td>
<td></td>
</tr>
<tr>
<td>Produce Safety</td>
<td>Nov 27, 2015</td>
<td>1) The provisions covering sprout production first go into effect at the</td>
<td>Jan 26, 2017 to Jan 26, 2022</td>
</tr>
<tr>
<td></td>
<td></td>
<td>beginning of 2017 for farms making over $500,000 or later depending on sales</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>level.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2) Other provisions of the rule go into effect beginning of 2018 or after</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2018, depending on the provision and size of farm's business**.</td>
<td></td>
</tr>
<tr>
<td>Sanitary Transportation</td>
<td>April 5, 2016</td>
<td>1 year after final rule-General</td>
<td>April 6, 2017, April 6, 2018</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 years after final rule-small business + other</td>
<td></td>
</tr>
<tr>
<td>Prevention of Intentional Adulteration</td>
<td>July 25, 2016</td>
<td>Three years after final rule: general</td>
<td>July 26, 2019, July 27, 2020,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Four years after final rule: small business*</td>
<td>July 26, 2021</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Five years after final rule: very small business (&lt;$10 million)</td>
<td></td>
</tr>
<tr>
<td>Foreign Supplier Verification Programs</td>
<td>Nov 13, 2015</td>
<td>18 months after final rule</td>
<td>May 27, 2017, Nov 27, 2017</td>
</tr>
<tr>
<td></td>
<td></td>
<td>For produce sector: 18 month + 6 months</td>
<td></td>
</tr>
<tr>
<td>Accredited Third-Party Certification</td>
<td>Nov 13, 2015</td>
<td>ASAP after final model accreditation standards guidance and final fee rules</td>
<td></td>
</tr>
</tbody>
</table>

** Water Testing Provisions, label requirements, etc.

## WHY IS FSMA IMPORTANT FOR VIETNAM?

- Vietnam is one of the top 15 US agri-food trade partners
- Main products exported from Vietnam to the US include:
  - Seafood
  - Tree Nuts
  - Fruits & prep
  - Vegetables & prep.
  - Coffee
  - Spices
  - Honey
  - Rice
  - Grain
  - Pet Food / Ingredient
PC HUMAN FOOD: COMPONENTS OF THE FOOD SAFETY PLAN

Food Safety Plan
Including procedures for monitoring, corrective action and verification

Hazard Analysis

Recall Plan

Prepared or overseen by one or more PCQIs.

Process Control

Sanitation Control

Supply-chain Program

Allergen Control

GMPs and Other Prerequisite Programs

FSMA RULE FOR PREVENTION OF INTENTIONAL ADULTERATION (IA RULE)

Food Defense Plan

Vulnerability assessment

Mitigation strategies

Food defense monitoring

Food defense corrective actions

Food defense verification

Reanalysis

Document

Training

Record-Keeping

Document

Procedure

Document

Procedure

Document

Procedure

Document
SUPPLIER VERIFICATION ACTIVITIES

- Determined based on evaluation of:
  - Food risks
  - Foreign supplier processes, procedures & practices
  - Other pertinent factors

- Include:
  - Onsite audits
  - Sampling and testing of food
  - Review of the foreign supplier’s relevant food safety records
  - Other appropriate supplier verification activities

- FSMA Certification: Is a voluntary program for foreign (non-US) facilities producing foods for humans and animals within the Voluntary Qualified Importer Program (VQIP), which offers expedited review and entry of food into the United States

PC HUMAN FOOD – SOME OF THE POTENTIAL TESTING REQUIREMENTS FOR MAIN HAZARDS*

- Pathogen testing of ingredients (supplier verification activity option)
- Testing ingredients for pesticide residues (foreign)
- Salmonella and Listeria environmental monitoring
- Allergen testing
- Testing for natural toxins as appropriate to the commodity and, where existing commodity programs address natural toxins (e.g., aflatoxin in peanuts, mycotoxin testing in grains)
- Heavy metals and coloring is also already used as necessary

*The above list is provided for illustration purposes. Testing requirements may be different for each product and facility.
FOOD FRAUD

- In FSMA, Food fraud is covered under Economically Motivated Adulteration (EMA).

- Definition of EMA: Fraudulent, intentional substitution or addition of a substance in a product for the purpose of increasing the apparent value of the product or reducing the cost of its production. i.e. for economic gain.

- Food facilities must consider Food Fraud (Economically Motivated Adulteration) risk in their hazard analysis process of FSMA Preventive Controls.

MITIGATING FOOD FRAUD RISKS WITH NEXT GENERATION SEQUENCING (NGS)

- Untargeted DNA approach including thousands of species
- Includes meat, fish, seafood, plants, coffee, allergenic species
- Only 1 test to identify all sample content based on DNA analysis.
- Results are based on the most reliable DNA-based method for identification – DNA sequencing
- No additional result confirmation is needed
- No false positive results are obtained
- The result is the list of all the species contained in the food product
- Even exotic species are identified
NEXT GENERATION SEQUENCING (NGS): SPECIES CATEGORIES

- 9 categories:
  - Meat
  - Fish
  - Seafood - Crustaceans
  - Seafood - Cephalopods
  - Seafood – Bivalves
  - Plants (spices, coffee, etc)
  - Micro-organisms - Bacteria
  - Micro-organisms – Fungal
  - Allergens (20, DNA based)

SGS

SGS FSMA SERVICES FOR VIETNAMESE SUPPLIERS

Audits & Certification
- FDA GMP Audits / FSMA Desktop Review / Gap audits
- 2nd party supplier audit based on client requirements
- Accredited FSMA certification audit (2017)

Testing
- Environmental Monitoring validation
- Micro & chemical testing
- Allergen testing
- Water testing

Technical Consultancy
- Importer/manufacturer support - supply chain risk assessment (FSVP, PCHF, PCAF)
- Allergen Labelling
- Marketability assessments and other customized FSMA studies/services
- Review of Environmental Monitoring protocols (EMP)
- Product sampling/testing methodologies (MRLs, etc.)

Training
- FSPCA - FSVP & PCQI (Preventive Controls Qualified Individual) – Human food & Animal food
- FSMA Integration Courses
- Auditor courses, virtual training, etc.

Virtual
SUCCESS FACTOR: FROM FARM TO TABLE

SEED AND CROP
- Pre-farm gate
- Farming

COMMODITIES
- Trade
- Processing

FOOD
- Manufacturing
- Retail
- Consumer
- Food service

INTEGRATED SOLUTIONS ACROSS THE VALUE CHAIN
- Inspection services
- Analytical & Testing services
- Audit & Certification services
- Training services
- Advisory services

WWW.SGS.COM
EUROFINS SAC KY HAI DANG

Pesticide control alert in agriculture products export

Ha Phuong Minh
Business Development Manager

Market news!

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY
Health and food audits and analysis

FINAL REPORT OF AN AUDIT CARRIED OUT IN VIETNAM FROM 1 TO 9 MARCH 2017 IN ORDER TO EVALUATE CONTROLS OF PESTICIDES IN FOOD OF PLANT ORIGIN INTENDED FOR EXPORT TO THE EUROPEAN UNION

The report concludes that legislation and implementing procedures are in place to establish a control system for pesticides, but there were significant gaps with the implementation of official controls. Consequently, no effective pesticide control system for food exported to the EU is in place, and the authorities cannot ensure compliance of Vietnamese produce with international maximum residue levels for pesticide residues, including those established by the EU. Some private controls are implemented by individual exporters of fruit and vegetables to the EU, which can contribute to compliance of their produce with EU maximum residue levels.

Some limited measures were taken by the competent authorities to address the recommendations of the previous audit DG(SANCO)/2014-7177, but overall very little progress has been made, and the recommendations had not been satisfactorily addressed.
EU audits – Vietnam not compliant for pesticide residues

Posted on 15 August 2017 by Cesare Varallo

This report describes the outcome of an audit in Vietnam carried out from 1 to 9 March 2017, as part of the published DG Health and Food Safety audit programme. The objectives of the audit were to assess controls on pesticide residues in fruit, vegetables, herbs and spices intended for export to the European Union (EU), and to follow-up on actions undertaken in response to recommendations of the previous audit, DG(SANCO)/2012-7177.

The report concludes that legislation and implementing procedures are in place to establish a control system for pesticides, but there were significant gaps with the implementation of official controls. Consequently, no effective pesticide control system for food exported to the EU is in place, including those established by the EU. Some private controls are implemented by individual exporters of fruit and vegetables to the EU, which can contribute to compliance of their produce with EU maximum residue levels.

Some limited measures were taken by the competent authorities to address the recommendations of the previous audit, DG(SANCO)/2012-7177, but overall very little progress has been made, and the recommendations had not been satisfactorily addressed.

Supply chain

2014/2015 World Nuts & Dried Fruits Trade Map

![Diagram of supply chain](image_url)
Pesticide control:

Authorities control

Seed → Production → Trade → Processing → Retail → Consumer

Private control

Farmers
- Check farm condition: soil, water source, seed.
- Follow the treatment guidance, keep communicate the status of crop with expert.
- Sampling pre harvest for checking

Exporters
- Provide Agriculture expert to check together with farmers the right pesticides to use and how to use
- Establish treatment guidance, supervise and on field consult for farmers during the crop.
- Awarded/ fair trade for good quality products

Eurofins
- Provide info of pesticide regulation, list of pesticide allow to use by law
- Provide consistency analyses result with international Lab (LOD, uncertainty)

Transparency is must between all parties
Eurofins involve

- Seed
- Fertilizer
- Pesticides

Production → Trade → Processing → Retail → Consumer

Eurofins Agroscience
- Testing of new substances

Eurofins Network Food
- Pre-Harvest Sampling
- Pre-Shipment Sampling
- After Arriving Sampling

The Problem

Carbendazim/Benomyl (sum) derzeitiger MRL: 0,1 mg/kg

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Results</th>
<th>Results below MRL</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>528</td>
<td>256</td>
</tr>
<tr>
<td>2015</td>
<td>469</td>
<td>315</td>
</tr>
<tr>
<td>2016</td>
<td>402</td>
<td>315</td>
</tr>
</tbody>
</table>

Anteil Überschreitungen: 52% 35% 36%
Eurofins Laboratories Worldwide

150,000 Methods
410 Laboratories
41 Countries
1 Eurofins

Eurofins Network for Food Analysis

China
Eurofins | Technology Service (Suzhou)
(Pesticides, Contaminants)

Vietnam
Eurofins | Sac Ky Hai Dang Co., Ltd.
(Pesticides – Quick Check, Microbiology)

Germany
Eurofins | WEJ Analytik
(General Food Analysis)

USA
Eurofins | Central Analytical (New Orleans)
(Pesticides, Contaminants)

France
Eurofins | Analyticl Nantes (Authenticity)

Eurofins | Dr. Specht Laboratorien (Pesticides)
Visit our lab:

*Eurofins Sac Ky Hai Dang*

*Lot E2b-3, Sai Gon High Tech Park, District 9, Ho Chi Minh City*

Contact:
Ms. Ha Phuong Minh - Business Development Manager
minhaphuong@eurofins.com
+84 913849748

Thank you!