

Do You Sell Imported Food?

The FDA May Consider You to be the Importer



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FOREIGN SUPPLIER VERIFICATION PROGRAMS SHOULD BE IN PLACE BY MAY 2017



Under FSMA, the “Importer” is the US owner or consignee of an article of food that is being offered for import at the time of US entry. Could this be you? “Importers” must have a Foreign Supplier Verification Program (FSVP) on all imported products.

Do you have a program in place or do you have copies of what your “Importer” says he has on file? (It’s important to trust, but verify this documentation.) Take a minute and answer these three key questions to help determine if you could be considered the importer. If you answer “me” to any of them, better have your food safety team recheck your status regarding your foreign suppliers:

1. *Who controls the finances of the imported food?*
2. *Who controls the agent?*
3. *Whose truck picks it up or in whose DC is the product stored upon clearing customs?*

HERE ARE THE RECORDS REQUIRED FOR FOREIGN SUPPLIER VERIFICATION

Any record requested by the FDA must be available within 24 hours and could go two years back. If you don't have an automated system, it's likely time to consider one, as it's really the only way to manage the range of documents required by FSMA across your supplier base. Here are the records that should make up your FSVP:

- Hazard Analysis
- Foreign supplier Approved list
- Foreign supplier performance evaluation
- Foreign supplier approval procedures
- Procedures assuring only approved foreign suppliers are used
- Verification activities & their frequency used to determine approved foreign suppliers
- Performance of verification activities
- Identified corrective actions needed
- Re-evaluation of FSVP by cause, or at least every 3 years

WHAT'S AT STAKE?

Senior executives are legally responsible for their company's compliance with FSMA. And, don't forget about the possibility of a disruption to your supply chain! Need we say more?

WHY NOW TO TAKE ACTION?

Implementing a new system with your suppliers will take time. It is your responsibility to ensure you and your suppliers are in compliance by the deadline.

WHAT'S THE DEADLINE?

May 31, 2017

FDA FOOD SAFETY
MODERNIZATION ACT

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