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Food Processing:
Ensuring the Safety of Imported Food

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Introduction

The amount of food imported into the U.S. has grown more than 50% since 1990, to reach some $33 billion worth of food imported in 1996. More than 33% of all fresh fruit and 12% of vegetables consumed in America now come from overseas (see Figure 1.). During any given week, Americans may consume coffee from Columbia, fruit from Mexico, shrimp from India, and egg noodles from Korea.

Figure 1. Import Share of Selected Foods Consumed in the United States, 1980-95:
Percentage of total U.S. consumption provided by imports

Import item	1980	1985	1990	1995	Percent change, 1980-1995
Fish and shellfish	45.3	53.8	56.3	55.3	22.1
Fresh fruits	24.2	28.0	30.7	33.3	37.6
Fresh vegetables	7.6	8.9	8.4	11.7	53.9
Tomatoes for processing	1.4	7.0	5.7	3.5	150.0
Broccoli for processing	9.1	22.2	57.8	84.9	833.0

Source: U.S. Department of Agriculture, Economic Research Service

Mexico is the prime exporter of vegetables to the United States. Since the creation of the North Atlantic Free Trade Agreement (NAFTA), exports of Mexican produce to the U.S. have nearly doubled, from $934 million in 1992 to $1.7 billion in 1996.

Under U.S. law, imported food products should meet the same quality standards that are required for domestic goods. Imported foods must be pure, wholesome, safe to eat, and must be produced under sanitary conditions; and all labeling and packaging must be informative and truthful.

However, imported foods do not always meet these standards. Recent news stories have described illnesses caused by contaminated strawberries from Mexico and contaminated raspberries from Guatemala. Overall, the Council for Agricultural Science and Technology estimates that foodborne pathogens account for as many as 9,000 deaths, and 6.5 million to 33 million illnesses annually, in the United States.

Current Enforcement Programs

Many federal agencies have some role in overseeing food safety in the U.S., including:

- Food and Drug Administration (FDA). Responsible for ensuring the safety of all foods (including seafood and aquaculture products) *except* meat, poultry, and egg products.
- Two agencies of the United States Department of Agriculture:
  - Food Safety and Inspection Service (FSIS). Responsible for ensuring the safety of meat, poultry and egg products.
  - Animal and Plant Health Inspection Service (APHIS). Responsible for protecting animals and plants from diseases or pests.
- Environmental Protection Agency (EPA). Responsible for establishing levels of pesticide residue that can be tolerated by humans.
- Centers for Disease Control and Prevention (CDC). Responsible for investigating foodborne diseases.
- United States Customs Service. Responsible for authorizing import of foreign goods.

Although all these agencies are involved to some degree in ensuring the safety of imported foods, the sheer number of food shipments entering the U.S. has created concerns about just how effective federal oversight can be. Also, differences in agency enforcement approaches and legal authority are an area of concern, as has been addressed in a recent report by the U.S. General Accounting Office (GAO).

The two main agencies responsible for ensuring the safety of imported foods are the FSIS and the FDA. However, these agencies differ significantly in their enforcement approaches. Both the FSIS and the FDA require imported foods to meet the same standards as domestic foods. However, by law, FSIS places the principal burden for safety on the exporting countries, by allowing imports only from those countries that have food safety systems which FSIS deems to be equivalent to the U.S. system. The FDA, lacking such authority, allows food imports from almost any country, and assumes the burden of ensuring the safety of imported foods as they arrive at U.S. ports of entry.

According to the GAO, FDA has not been able to keep pace with the rising level of imports. FDA's coverage of import shipments has fallen from an estimated 8% in fiscal year 1992 to an estimated 1.7% in fiscal year 1997.

What this means is that importers of food products should not rely on the enforcement activities of these government agencies to ensure the safety of food products. To do so would be to ignore the possibility of introducing contaminated food into the U.S. stream of commerce.

Risk Management

Importers of foreign food products should adopt appropriate risk management controls to reduce the possibility of accepting contaminated food products. Consider implementing the basic controls described here. (Note: this list should not be viewed as inclusive.)

- Establish a Hazard Analysis Critical Control Point program (HACCP) for domestic operations. (Refer to The Hartford's TIPS *The FDA Food Code and Hazard Analysis Critical Control Point Plan* (HACCP); request item S 190.001.)
- Depending on the organization's bargaining strength, encourage or require foreign suppliers to establish a HACCP program.
- Before accepting product from a foreign supplier, have qualified individuals inspect the supplier's operation to ensure that its food safety system is equivalent to the U.S. system.
- Institute a statistically-based quality control program for imported foods. Design the program so that it provides an acceptable level of confidence in the safety of the product. Document and retain data on file for a reasonable length of time.
- Where practical, develop a data base to identify problem suppliers and identify trends; implement corrective action to reduce or eliminate food safety problems from these suppliers.
- Develop a documented tracking system so that any imported food product found to be contaminated and requiring recall can be easily identified and traced.
- Develop an adequate product recall program that will minimize the adverse aspects of a required product recall.

Summary

The amount of food imported into the United States has increased significantly in the last ten to fifteen years. Even though numerous federal government agencies are involved in ensuring the safety of these imported foods, there is concern that current oversight is less than adequate. Therefore, importers of foreign foods should implement appropriate risk management controls to reduce the possibility of introducing contaminated products into the U.S. stream of commerce.