

Foreign Supplier Verification Program Key Points

What are FSVP importers required to verify?

- FSVP importers are required to verify that their foreign suppliers produce food in a manner that meets the same level of public health protection as the Preventive Controls for Human and Animal Food Rules (21 CFR Part 117, Part 507) and Produce Safety Rule (21 CFR Part 113), and that the food will not be adulterated and is properly labeled for allergens.

How are FSVP importers required to conduct the verification?

Hazard Analysis

- FSVP importers must conduct or obtain a hazard analysis for each type of food imported. The hazard analysis must consider biological, chemical and physical hazards. The hazard analysis must consider hazards that are natural, unintentionally introduced, and intentionally introduced for purposes of economic gain. For produce subject to the Produce Safety Rule, biological hazards do not need to be considered.

Supplier Evaluation

- Generally, suppliers must be evaluated and approved before they may be sourced from.
- The evaluation must consider the hazard analysis and the entities controlling the hazards or verifying control of hazards.
- The evaluation must consider:
 - The foreign supplier's procedures, processes and practices related to the safety of the food.
 - Applicable FDA food safety regulations and the supplier's compliance with them.
 - The supplier's food safety history, including available information about testing, audit results and corrective actions.
 - Any other factors as appropriate and necessary, such as storage and transportation.

Supplier Reevaluation

- If the FSVP importer becomes aware of any new information related to the above factors, the FSVP importer must reevaluate the supplier promptly and determine whether it is proper to continue sourcing from them and whether or not the FSVP importer is conducting proper supplier verification activities.
- Reevaluations of suppliers must occur at least every three years.

Verification Activities

- FSVP importers must verify control of hazards through the use of onsite audits, testing, review of food safety records and other appropriate activities.

Many of these requirements may be outsourced to qualified third-parties, although FSVP importers are required to review and assess outsourced work and remain responsible for complying with them.