Preparing Your 2015 Food Safety Plan: Legal and Insurance Considerations

FOOD & BEVERAGE PRACTICE

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LEARNING OUTCOMES

At the end of this module, participants should be able to:

- Understand the loss exposure areas of their industry and the data insurance carriers review to make pricing decisions
- Understand, at a high level, what exposures and coverages are unique to this industry
- Understand what a loss control representative from an insurance carrier looks for when visiting visit your operation
- Understand how to present your operation during loss control visits so that you receive the most favorable pricing possible
- Use our takeaway tools to improve your internal processes

INDUSTRY AT A GLANCE

Industry	Number of U. S. Companies	Annual Revenue $ Billion
Bakeries (large commercial)	2,600	25[1]
Bakeries (small retail)	7,000	2[1]
Beverage manufacturers	3,000	70[2]
Cereal manufacturers	50	9[3]
Candy manufacturers	1,600	17[4]
Dairy products	1,200	60[5]
Breweries	1,400	18[6]
Coffee and tea processing	250	6[7]
Seasonings and dressing manufacturers	600	13[8]
Edible oil manufacturers	250	38[9]
Fruit and vegetable processing	2,000	40[10]
Cookie and cracker manufacturers	300	10[11]
Sugar refiners	52	7[12]
Total	**20,252**	**315**

First Research, Quarterly

CNA

2.2 million **farms** located across the U.S.

- > 57,000 **food processors**, including 6,500 process meat, poultry, and egg products
- 164 **import establishments**
- > 1.2 million **retail food** facilities nationwide

TOP EXPOSURE AREAS FOR INDUSTRY

- Workers compensation claims
- Property claims
- Auto claims
- General liability claims
- Product contamination
- Product recall

WORKERS' COMPENSATION

Top Five Incidents Causing the Injury, Shown as a Percentage of Total Claims

Incident Type	Percent of Total Claims
Manual Handling/Physical Stress/Repetitive Motion	29%
Struck By or Against	28%
Slips/Trips/Falls on Same Level	13%
Exposure//Contact With Mold/Fumes/Etc.	6%
Fall From Elevation	4%

Top Five Incident Types, Shown as a Percentage of Total Claim Dollars

Incident Type	Percent of Total Claim Dollars
Manual Handling/Physical Stress/Repetitive Motion	35%
Struck By or Against	18%
Slips/Trips/Falls on Same Level	18%
Fall From Elevation	6%
Exposure//Contact With Mold/Fumes/Etc.	2%

The data indicates that the types of incidents most likely to cause worker injuries are manual material handling and physical stress; struck by and struck against; and falls on the same level. These three incident types also represent the highest severity of claims (cost in terms of claim dollars paid).

PROPERTY

Top Five Incidents Causing the Loss, Shown as a Percentage of Total Claims

Incident Type	Percent of Total Claims
Wind Damage	22%
Fire	14%
Burglary/Theft	12%
Struck By Vehicle	9%
Snow/Ice Damage	1%

Top Five Incident Types, Shown as a Percentage of Total Claim Dollars

Incident Type	Percent of Total Claim Dollars
Fire	51%
Wind Damage	25%
Snow/Ice Damage	16%
Burglary/Theft	2%
Not Otherwise Classified	2%

AUTO

Top Five Incidents Causing the Loss, Shown as a Percentage of Total Claims

Incident Type	Percent of Total Claims
Rear-ended Other Vehicle	15%
Struck By Object	9%
Other Vehicle Struck Insured Parked Vehicle	5%
Struck Object In Roadway	3%
Other Vehicle Changed Lanes	3%

Top Five Incident Types, Shown as a Percentage of Total Claim Dollars

Incident Type	Percent of Total Claim Dollars
Rear-ended Other Vehicle	30%
Other Vehicle Failed To Stop	8%
Other Vehicle Rear Ended Insured	5%
Other Vehicle Changed Lanes	2%
Other Vehicle Struck Insured Parked Vehicle	2%

Analysis of auto claims reveals one of the most preventable types of accidents, rear-ending other vehicles, as the leader in terms of frequency and severity. The food processing industry exhibits a wide variety of auto claims within each claim category.

GENERAL LIABILITY

Top Five Incidents Causing the Loss, Shown as a Percentage of Total Claims

Incident Type	Percent of Total Claims
Eating/Drinking	64%
Damage Not Otherwise Classified	9%
Leaking/Seeping	8%
Slip/Trip-Fall On Level	3%
Vehicle Accident	2%

Top Five Incident Types, Shown as a Percentage of Total Claim Dollars

Incident Type	Percent Of Total Claim Dollars
Eating/Drinking	29%
Damage Not Otherwise Classified	14%
Exposure to or Contact With Mold, Fumes, or Vapors	12%
Vehicle Accident	9%
Struck By	9%

PRODUCT RECALL / CONTAMINATION

CDC Estimates of Foodborne Illness in the United States

FINDINGS

CDC 2011 Estimates

CDC estimates that each year roughly 1 in 6 Americans (or 48 million people) gets sick, 128,000 are hospitalized, and 3,000 die of foodborne diseases. The 2011 estimates provide the most accurate picture yet of which foodborne bacteria, viruses, microbes ("pathogens") are causing the most illnesses in the United States, as well as estimating the number of foodborne illnesses without a known cause.* The estimates show that there is still much work to be done—specifically in focusing efforts on the top known pathogens and identifying the causes of foodborne illness and death without a known cause.

Reducing foodborne illness by 10% would keep about 5 million Americans from getting sick each year.

Foodsafety.gov

Your Gateway to Federal Food Safety Information

Ruiz Foods Recalls Sausage Product Due to Misbranding and an Undeclared Allergen

Feb 17, 2015 8:51 PM Ruiz Foods, a Denison, Texas establishment, is recalling approximately 59 pounds of sausage product due to misbranding and an undeclared allergen.

Michigan Brand, Inc. Recalls Products Due to Misbranding and an Undeclared Allergen

Feb 17, 2015 7:40 PM Michigan Brand, Inc., a Bay City, Mich., establishment is recalling approximately 4,287 pounds of pork sausage products due to misbranding and an undeclared allergen.

California Firm Recalls Beef Products Produced Without Benefit of Import Inspection

Feb 13, 2015 9:43 PM ATM International USA, Inc., a Torrance, Calif. establishment, is recalling approximately 1,999 pounds of boneless beef products that were not presented at the U.S. point of entry for inspection.

Whole Foods Markets, Inc. Recalls Products Due to Misbranding and an Undeclared Allergen

Feb 10, 2015 9:13 PM Whole Foods Markets, Inc. is recalling approximately 33,191 pounds of ready to eat products due to misbranding and an undeclared allergen.

Canada Firm Recalls Poultry Products Produced Without Benefit of Import Inspection

Feb 10, 2015 12:00 AM Sunrise Poultry Processors, an Alberta, Canada, establishment, is recalling approximately 2,705 pounds of poultry products that were not presented at the U.S. point of entry for inspection.

Recall Notification Report 028-2015 (Bratwurst)

Feb 4, 2015 5:28 PM Krehbiels Specialty Meats, Inc., a McPherson, Kan. establishment, is recalling approximately 29 lbs. pounds of pork bratwurst product due to misbranding.

Spiceco Issues A Correction Regarding Allergy Alert On Undeclared Peanut Allergen In 5 Oz. Containers Of Pride Of Szeged Sweet Hungarian Paprika Lot #091617PAHU05PS and Lot #091717PAHU05PS

Feb 18, 2015 9:52 PM Spiceco of Avenel, NJ is recalling PRIDE OF SZEGED SWEET HUNGARIAN PAPRIKA because it may contain undeclared Peanut Allergen. People who have an allergy or severe sensitivity to Peanut Allergen run the risk of serious or life-threatening allergic reaction if they consume this product.

Goya Foods, Inc. Announces Recall of Kirby Brand Black Beans with Creole Seasoning and Goya Brand Black Bean Soup for Undeclared Peanut Protein

Feb 17, 2015 11:30 AM Certain lots of Kirby brand black beans with creole seasoning, 29 oz. size and Goya brand black bean soup, 29 oz. size made by Goya Santo Domingo, S.A. are being recalled. The voluntary recall was announced after the Company was notified by one of its ingredient suppliers that one lot of ground cumin had potentially been produced with undeclared peanut protein.

Unilever United States, Inc. Issues Allergy Alert for Limited Number of Tubs of Breyers® No Sugar Added Salted Caramel Swirl Due to Undeclared Almond

Feb 17, 2015 11:00 AM Unilever United States, Inc. is voluntarily recalling a limited number of tubs of Breyers® No Sugar Added Salted Caramel Swirl because they may inadvertently contain almonds, which are not listed as an ingredient on the label. Persons who have an allergy or severe sensitivity to almond run the risk of a serious or life-threatening allergic reaction if they consume this product.

Whole Foods Market's Glastonbury Store Recalls Divine Treasures 100,000 Smooches Vegan Chocolate Due to Undeclared Allergen

Feb 14, 2015 9:40 AM Whole Foods Market is recalling "Divine Treasures 100000 Smooches" sold at the Glastonbury, Connecticut location due to an undeclared peanut allergen. The product was sold in the Glastonbury store through February 11, 2015 and includes any Divine Treasures 1000000 Smooches with "Sell By" dates through May 6, 2015.

T. Marzetti Co Issues Allergy Alert on Undeclared Milk and Egg in Single Serve Packets of Larosa's Creamy Garlic Dressing Due to Label Issue

Feb 14, 2015 9:27 AM The T. Marzetti Co of Columbus, OH is voluntarily recalling 627 cases of LaRosa's Creamy Garlic Dressing in 1.5 oz packets because the product contains milk and egg allergens that are not declared on the packet label. The dressing was manufactured correctly and has always contained milk and egg; however there was an error in labeling.

Whole Foods Market's Southwest Region Recalls Chocolate Cake For Two Due To Undeclared Egg

Feb 13, 2015 9:16 PM Whole Foods Market is recalling chocolate cake for two produced and sold in retail stores in the Southwest Region, which includes TX, OK, LA, AR, due to undeclared egg. People who have an allergy or severe sensitivity to egg run the risk of serious or life---threatening allergic reaction if they consume these products.

PRODUCT RECALL / CONTAMINATION

Coverage has four components / Policies are NOT created equal:

1) Accidental contamination

Contamination, impairment, mislabeling, related adverse publicity, preparation, manufacture, processing, blending, mixing, compounding, packaging or distribution

2) Malicious product tampering

Actual, alleged or threatened, intentional, malicious, and wrongful alteration or contamination of the insured products by any person, employee of insured, rendering it unfit or dangerous for the intended use or consumption or as perceived by public

3) Governmental recall

Official recall order issued by authorities to comply with regulations on food safety; or a recall order by authorities to comply with regulations on food safety is imminent

4) Product extortion

Threat or connected series of threats to commit malicious product tampering that is communicated to insured to demand cash, monetary instruments, property or services

PRODUCT RECALL / CONTAMINATION

Coverage Options

- Recall costs (first and/or third party)
- All reasonable expenses to inspect, withdraw, destroy, and replace product
- Business interruption (lost gross profit)
- Rehabilitation costs
- Consultancy costs
- Adverse publicity

Underwriting Basis

- Revenue and product information
- Packaging and labeling
- Claims experience
- Crisis plans/recall plans/quality management

FOOD FOR THOUGHT

1) How does your operation's loss experience compare with the industry? Low-hanging fruit to focus on?
2) Workers' compensation - How have you proactively assessed and addressed exposures such as material handling, packaging, repetitive motion and contact with moving objects?
3) If property losses are severe, how have you addressed potential heat, electrical, housekeeping and equipment maintenance challenges?
4) Have you assessed and transferred risk regarding every aspect of your operation, including supply chain and transportation partners you rely upon?
5) Do you have emergency evacuation and crisis response plans? When were they last updated or a mock trial conducted? How will you respond to adverse publicity?
6) When was your product recall program last updated? What is your product recall response time and is upper management aware?

JIM KREMER,
Risk Solutions Manager

FEBRUARY 26, 2015

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RELATIONSHIPS

Associated Financial Group Loss Control

- Insurance carrier loss control representatives are responsible to the insurance carrier underwriter
- AFG loss control representatives are responsible to you - the client
- Your AFG loss control representative should:
  - Manage the relationship with **carrier** loss control
  - Act as your confidential advisor on matters of risk reduction

ATTENTION TO BASICS IS CRITICAL

Team Approach is Critical

- For all loss control functions, including:
  - Product safety and quality
  - Injury and accident prevention
- Multiple disciplines are necessary (including consultants)
- Leadership must possess the authority necessary to make decisions and commit money

ATTENTION TO BASICS IS CRITICAL

HACCP-Hazard Analysis & Critical Control Points

- Recordkeeping and Documentation
- Training Key Personnel
- Requiring Personnel Accountability
- **Reacting to Deviation**
- Updating HACCP as necessary

ATTENTION TO BASICS IS CRITICAL

Employee Involvement and Engagement

- Food industry employees can make or break success in all of the loss control functions
- Not just a sanitation problem
- Training is necessary and ongoing
- Partnering with employees is huge:
  - Must be part of the team
  - Must be encouraged and recognized for expressing honest concern and questions

ATTENTION TO BASICS IS CRITICAL

Employee Involvement and Engagement

- Train personnel to react to the unusual or unexpected
- Train personnel to use all of their senses (sight, sound, smell, etc.)
- Actively listen to concerns
- Close the loop when personnel bring up concerns-tell them the outcome of your investigation

ATTENTION TO BASICS IS CRITICAL

Walk Your Plant

- Everybody does documented inspections BUT are decision makers really in the plant?
- Key personnel need to get out, look around and talk
- During the walks, key personnel need to comment on what they like and what concerns them

ATTENTION TO BASICS IS CRITICAL

Product Stewardship

- Supplier/vendor certificates, labs and inspections
- Label information retention
- Lab documentation recordkeeping
- Careful lot number tracking
- Retains-organization and storage
- Cataloging customer calls and complaints
- Sanitation recordkeeping

ATTENTION TO BASICS IS CRITICAL

Know the Recall Drill

- Written recall program necessary
- All duties specified, including media contact
- Act quickly, get out ahead of the problem
- Always act in an ethical manner, conveying concern for your customers
- Involve legal and insurance partners immediately
- Effective communication at all levels

ATTENTION TO BASICS IS CRITICAL

Recall Drills

- Conduct annual (or more frequent) recall drills
- Unannounced whenever possible
- Key personnel/alternates must participate
- Have a timekeeper monitoring activities
- If possible, have a non-company observer (insurance consultant, legal representative, etc.) present
- Critique each drill

ATTENTION TO BASICS IS CRITICAL

Employee Safety

- Trend accidents and near misses
- Be proactive addressing accident trends
- Train employees early and often—set the expectation that injuries *are not part of* business
- Train supervisors: Supervisors must support the ***"Big Three"*** of production—safety, quality, and productivity

ATTENTION TO BASICS IS CRITICAL

OSHA Compliance

- Written safety program
- OSHA log
- Training documentation
- Look at:
  - Machine guarding
  - Sanitation-chemical use and operations
  - Electrical
  - Ergonomics

ATTENTION TO BASICS IS CRITICAL

OSHA Compliance-Hot Issues

National

- Combustible dust
- Chemical management and PELs
- Process Safety Management (ammonia)
- Eye and Face Protection
- Maintaining employee injury records

Regional

- Powered Industrial Trucks

ATTENTION TO BASICS IS CRITICAL

Ammonia Refrigeration

- Ammonia releases are the most common hazmat emergency in the United States
- Have a reputable contractor/internal engineer
- OSHA PSM may be required
- Protect piping and engine rooms
- Label valves
- Train and drill for release response

ATTENTION TO BASICS IS CRITICAL

Property Protection

- Fire protection systems must be operational
- Train personnel on how systems work and how to control them
- Fire prevention plan for all hot processes and flammable/combustible material processes
- Hot work program must be in place and followed
- Housekeeping
- Fire department pre-planning

ATTENTION TO BASICS IS CRITICAL

Facility Security

- Keep physical security in shape: lights, locks, fences, gates
- Increased controls for raw materials and products
- Visitor control: Post signs; use visitor registry; truck logs for drivers, power units and trailers
- Identify employees and visitors differently (BADGES)
- Consider CCTV

RESOURCES

Available for your review (folder):

- Microsoft Excel Food Manufacturer Risk Improvement Tool (compliments of Liberty Mutual) – **Full tool available upon request**
- OSHA's 2014 most frequently cited standards (food manufacturers)
- Summary of environmental & regulatory Liabilities (food manufacturers)
- Listing of Food Practice Loss Control Services (Safety Services provide by AFG)
- Seminars and Webinars Training schedule through 6/2015
- Invitation to AFG's Leaders Forum with Joseph Grenny, author of "Crucial Conversations"
- HR Solutions Tear Sheet
- AFG Food Practice Group Bios

THANK YOU

In summary, we thank you and hope you found this presentation helpful. This was very high level! Please reach out with additional questions or schedule time to discuss further.

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FSMA UPDATE:
A REVIEW OF THE FSMA AND HOW TO PREPARE YOUR COMPANY FOR THE FUTURE

February 26, 2015

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Partnering for your Success

Food Safety Modernization Act

"I thank the President and members of Congress for recognizing that the burden that foodborne illness places on the American people is too great, and for taking this action."

Margaret A. Hamburg, M.D.
FDA Commissioner

Date of Enactment: January 4, 2011

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Agenda

- Reasons for the law's enactment
- Main themes
- Key provisions of the law and their significance

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Why Is the Law Needed?

- Foodborne illness is a significant burden
  - About 48 million (1 in 6 Americans) get sick each year
  - 128,000 are hospitalized
  - 3,000 die
- Outbreaks
  - Listeria in caramel apples—31 ill, 7 deaths
  - E. Coli in spinach—205 ill, 3 deaths
  - Listeria in cantaloupe—146 ill, 30 deaths
  - Salmonella in peanuts—714 ill, 9 deaths

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Why Is the Law Needed? (cont.)

- U.S. Food Imports
  - 15 % of U.S. food supply is imported
  - Imports of FDA-regulated food has doubled since 2002
- More types of foods in the marketplace
- Shifting demographics
  - Growing population is "at risk"

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Main Themes

- Prevention
- Inspection, compliance and response
- Import safety
- Enhanced partnerships

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Prevention

Hazard Analysis & Risk Based Preventive Controls (FDCA § 418)

Human Food

- Who would be covered?
- Facilities *must* prepare and implement a Food Safety Plan that includes:
  - A hazard analysis that identifies known or reasonably foreseeable hazards for each type of food at the facility
  - Preventive controls that will minimize/prevent the hazards (includes recall plan)
  - Monitoring procedures of the preventive controls to ensure they are consistently performed
  - Corrective actions for each preventive control if problems arise
  - Verification activities to ensure that preventive controls are adequate for their purpose

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Prevention

Hazard Analysis & Risk Based Preventive Controls (FDCA § 418)

Human Food (cont.)

- Recordkeeping requirements
  - Written food safety plan, including hazard analysis
  - Records that document preventive controls, monitoring, corrective actions and verification
  - Must be kept for two years
- Reanalysis
  - Required at least every three years
  - Additional triggers include:
    - » Preventive control is found to be ineffective
    - » Significant change, such as equipment, process, ingredient, etc.
    - » Aware of a new hazard

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Prevention

Hazard Analysis & Risk Based Preventive Controls (FDCA § 418)
Human Food (cont.)

- Revised supplemental proposal
  - Released on September 19, 2014
- Compliance dates
  - Date of Final Rule: August 30, 2015
    - » Very small businesses (<$1 million in annual sales): three years after publication of final rule
    - » Small businesses (<500 employees): two years
    - » Other businesses: one year

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Prevention

Hazard Analysis & Risk Based Preventive Controls (FDCA § 418)
Animal Food

- Who would be covered?
- Parallels the proposed human preventive control rule
  - Must comply with preventive control requirements, including written Food Safety Plan
- Implementation of CGMP regulations for animal food

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Prevention

Hazard Analysis & Risk Based Preventive Controls (FDCA § 418)
Animal Food (cont.)

- Revised supplemental proposal
  - Released on September 19, 2014
- Compliance dates
  - Date of Final Rule: August 30, 2015
    - » Very small businesses (<$2.5 million in annual sales): three years after publication of final rule
    - » Small businesses (<500 employees): two years
    - » Other businesses: one year

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Prevention

Standards for Produce Safety (FDCA § 419)

- Who would be covered?
- Covered produce
- Limitations on coverage

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Prevention

Standards for Produce Safety (FDCA § 419) (cont.)

- Focus on potential routes of microbial contamination
  - Water
  - Manure
  - Animal encroachment
  - Worker health and hygiene
  - Equipment, tools, buildings
- Other requirements
  - Sprouts
  - Growing, harvesting, packing and holding activities

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Prevention

Standards for Produce Safety (FDCA § 419) (cont.)

- Revised supplemental proposal
  - Released on September 19, 2014
- Compliance dates
  - Date of Final Rule: October 31, 2015
    - » Very small businesses (between $25,000 and $250,000 in annual produce sales): four years after publication of final rule
    - » Small businesses (between $250,000 and $500,000 in annual produce sales): three years
    - » Other farms: two years

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Prevention

"Food Defense" Rule

- Goal is to prevent *intentional* contamination of food with intent to cause harm
- Who would be covered?
  - Applies only to subset of companies registered with FDA
  - Most likely targets of insider, terrorist attack
  - Those involved in most vulnerable activities:
    - » Bulk liquid receiving and loading
    - » Liquid storage and handling
    - » Secondary ingredient handling
    - » Mixing and similar activities

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Prevention

"Food Defense" Rule (cont.)

- Parallels human preventive control rule in language and approach
  - Complete a food defense plan
    - » Assess vulnerabilities
    - » Implement mitigation strategies
    - » Monitor, verify
    - » Take corrective actions when necessary
- Exemptions

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"Food Defense" Rule (cont.)

- Compliance dates
  - Date of Final Rule: March 31, 2016
    - » Very small businesses (<$10 million annual sales): 3 years + 60 days from publication of final rule
    - » Small businesses (<500 employees): 2 years + 60 days
    - » Other businesses: 1 year + 60 days

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Prevention

Sanitary Food Transportation Act

- Goal is to ensure transportation practices do not create food safety risks
- Focus on areas of risk
  - Refrigeration
  - Cleaning
  - Cross contamination
- Who would be covered?
  - Domestic intrastate and interstate shipments
  - Foreign shippers

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Sanitary Food Transportation Act (cont.)

- Proposed rule would establish requirements governing:
  - Vehicles and transportation equipment
  - Transportation operations
  - Information exchange
  - Training
  - Maintenance of written procedures and records
  - Waivers
- *Food is deemed adulterated if transported in violation of SFTA rules!*

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Prevention

Sanitary Food Transportation Act (cont.)

- Compliance dates
  - Date of Final Rule: March 31, 2016
    - » Small businesses other than motor carriers who are not also shippers and/or receivers (<5 employees and motor carriers having <$25.5 million in annual receipts): two years after publication of final rule
    - » Other businesses: one year

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Inspection and Compliance

- Inspection of records
  - "Reasonable belief" that exposure to food will cause serious adverse health consequences or death
  - Access to all records associated with importing, manufacturing processing, packing, and distributing food
  - Effective immediately

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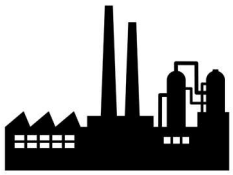
Inspection and Compliance (cont.)

- Inspection of facilities
  - Increase frequency
    - » Domestic "high risk" facilities—within five years of enactment, once every three years thereafter
    - » Other domestic facilities—within seven years of enactment, once every five years thereafter
    - » Foreign facilities—at least 600 facilities per year, double inspections the year after for next five years
  - Effective immediately



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Response

- Mandatory recall authority
- Expanded administrative detention
- Suspension of registration
- Authority to require import certification
- Enhanced product tracing
- Additional recordkeeping for "high risk" foods

All effective immediately!

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Imports

Foreign Supplier Verification Program (FDCA § 805)

- Who would be covered?
- Importer accountability
  - Responsible for verifying that foreign suppliers have adequate preventive controls in place to ensure food is safe
    - » *Know your supply chain!*
  - Identify hazards reasonably likely to occur for each imported food
  - Conduct verification activities to ensure identified hazards are controlled
- FSVP exemptions

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Imports

Foreign Supplier Verification Program (FDCA § 805) (cont.)

- Revised Supplemental Proposal
  - Released September 19, 2014
- Compliance Dates
  - Date of Final Rule: October 31, 2015
    - » 18 months from final rule OR
    - » 6 months after their foreign suppliers reach their FSMA compliance deadlines, whichever is later

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Imports

Third Party Accreditation (FDCA §§ 422, 808)

- Program through which qualified third parties can certify that foreign food facilities comply with U.S. food safety standards
  - FDA will publish model accreditation standards
  - FDA will approve accreditation bodies
  - Accreditation bodies then will approve and oversee certification bodies
- Use of accredited laboratories
- Use of accredited auditors
- Date of Final Rule: October 31, 2015

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Enhanced Partnerships

- All food safety agencies must work together to achieve public health goals
  - Reliance on inspections by other agencies
  - State/local and foreign capacity building
  - Easier for consumers to find recall information
  - Among others

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Questions?

When in doubt, please consult an attorney in Reinhart's Food & Beverage Law Practice Group!

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