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NEWS RELEASE

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Protecting U.S. Food Supply from Attack Should Include Collaboration with Global Food Safety Organizations and U.S. Military, says NPA *NPA To Develop a Food Defense Checklist For Member Companies*

WASHINGTON, DC – The Food and Drug Administration’s (FDA) food defense plan for preventing intentional adulteration of the U.S. food supply should look to programs in the U.S. military and global food safety organizations, according to new comments filed by the Natural Products Association (NPA). The Food Safety and Modernization Act (FSMA) requires companies to have a food defense plan to prevent intentional adulteration of the food supply.

“The U.S. has the safest food and nutritional supplement supply in the world because of collaborative efforts between our industry and the federal government,” said Daniel Fabricant, Ph.D., president and CEO of NPA. “FDA should consult with other partners like the U.S. military and with global food safety organizations like GFSI to develop best practices, conduct vulnerability assessments, and understand how best to mitigate risk in facilities.”

NPA and the Supplement Safety and Compliance Initiative (SSCI), a GFSI-like program focused on finished dietary supplements and the supplement supply chain, would like to meet with the Agency to discuss how SSCI could help in setting a high bar to prevent intentional adulteration of the food supply.

Read NPA’s full comments [here](#).

There are global food safety schemes that include food defense requirements which could be leveraged in inspections and implementation:

- The Global Food Safety Initiative (GFSI)’s latest edition addresses food defense. Many of the GFSI-recognized schemes include more specific food defense requirements.
- The Safe Quality Foods (SQF) Code includes food defense elements as well as methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident.
- The Supplement Safety and Compliance Initiative (SSCI) could incorporate an audit to analyze vulnerabilities in the various steps of any given food manufacturing process. SSCI is a new initiative, patterned after GFSI, which exempted dietary supplements. Therefore, SSCI is addressing quality, transparency, safety, and food defense.

Many food defense activities are already conducted under the following programs:

- Department of Homeland Security’s (DHS) Customs-Trade Partnership Against Terrorism (C-TPAT) and mutually recognized international programs
- The Chemical Facility Anti-Terrorism Standards (CFATS)
- The USDA Food Safety and Inspection Services (FSIS) food defense plan template



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NPA would like to see in this guidance how FDA will accomplish the following:

- How will FDA develop its inspection and compliance strategy, including how facilities will be selected for inspections?
- How will food defense inspections be conducted for both domestic and foreign facilities?
- How will FDA engage in significant outreach activities, both domestic and international, to facilitate industry compliance with the IA Final Rule?
- How will the Agency communicate its thinking on inspection, compliance, and enforcement strategies?
- When will FDA update its compliance policy guide with the IA Final Rule on food defense?
- In addition to providing IA training for industry, will FDA be developing an auditor check list for industry to use to ensure a level playing field?
- How will FDA enforce domestically across all district office with even handedness?
- How will FDA's inspection and enforcement program be applied consistently throughout the country in a way that truly advances the ultimate goal of improved food defense?

Natural Products Association

The **Natural Products Association (NPA)** is *the* trade association representing the entire natural products industry. We advocate for our members who supply, manufacture and sell natural ingredients or products for consumers. The Natural Products Association promotes good manufacturing practices as part of the growth and success of the industry. Founded in 1936, NPA represents approximately 1,000 members accounting for more than 10,000 locations of retailers, manufacturers, wholesalers and distributors of natural products, including foods, dietary supplements and health/beauty aids. Visit www.npanational.org.