U.S. Strategies for Improving the Safety of Imported Foods

121st AFDO Annual Educational Conference
June 17 – 21, 2017

Steve Stich
States don’t have jurisdiction over imported foods right?
4,880
3,431 Imported (70%)
1,449 Domestic

Food Recalls 2000 - 2016
States’ Role: Imported Foods

- Sharing Information (Insp/Sample)
- Recovery Efforts
- Coordinated Enforcement
- Integrated Training
<table>
<thead>
<tr>
<th>ANALYSIS</th>
<th>RESULTS</th>
<th>INTERPRETATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>APPEARANCE</td>
<td>1.00 Unopened Glass Bottle/Jar GIGI MASTER DELICIOUS FRIED FISH, DD 19 2019 0425, SS</td>
<td>&gt; 500 PPM</td>
</tr>
<tr>
<td>HISTAMINE</td>
<td>Comments: Above FDA tolerance of 50 PPM.</td>
<td></td>
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<tr>
<td><strong>ANALYSIS</strong></td>
<td><strong>RESULTS</strong></td>
<td><strong>LABEL CLAIM</strong></td>
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<tr>
<td><strong>APPEARANCE</strong></td>
<td>2 Unopened Glass Bottles Jar ODT WET BEAN CURD, 22.01.2016 22.01.2018, SS</td>
<td></td>
</tr>
<tr>
<td><strong>pH</strong></td>
<td>6.1</td>
<td>ADULTERATED</td>
</tr>
<tr>
<td><strong>ALCOHOL</strong></td>
<td>20.2 %</td>
<td>ADULTERATED</td>
</tr>
<tr>
<td><strong>Comments:</strong> Alcohol tested from aqueous layer.</td>
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**ANALYSIS**

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<tr>
<th>pH</th>
<th>WATER ACTIVITY</th>
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</table>

**RESULTS**

- **pH**: 5.7
- **WATER ACTIVITY**: 0.97

**INTERPRETATION**

Comments: Product meets criteria for a low-acid food and requires a scheduled process or temperature control. No scheduled process or temperature control was indicated.
Cumin Powder Peanut allergen
2015-16

2929 ppm

11,700 ppm
July 2016: 54ppm Lead

Started with one lot, fresh finds brand – Big Lots – then 6 more brands - Dietary supplement?
Sept 2016 – 35ppm

Oriental Packing Co, Miami, FL
(5 brands) 377,000 lbs, or 188 tons
Turmeric Powder
Origin: Bangladesh
(FBD Distributors)
Contains:
Lead Chromate
Lead 52.8 ppm
Chromium 10.3 ppm
Chromate Test = positive
(Indian Standard 3576 : 2010)
Turmeric Powder

Origin: Bangladesh

(Southern Foods USA Inc.)

Contains:

Lead Chromate

Lead 146.0 ppm
Chromium 30.0 ppm

Chromate Test = positive

(Indian Standard 3576 : 2010)
“Best” Sample of 2012!

under White Light

Allura Red AC
Erythrosine
Tartrazine
Sunset Yellow

Ponceau 4R

Rhodamine B
Auramine O
Orange II
Acid Blue 1
Crystal Violet
Brilliant Green

Fluorescent Brightener?
Sample (12C-3167) under long wave UV light

Rhodamine B

Fluorescent brighteners?

Auramine O
Dried Tapioca Pearl

Origin: Vietnam

Contains:
- Rhodamine B
- Auramine O
- Malachite Green
  (as a colorant)

Also acid dyes:
- Tartrazine
- Brilliant Blue
- E123 Amaranth
“Best” Sample of 2015

Red Mukhwas

Origin: unknown

Contains:

>21% betel areca nut

Yellow dyed betel areca nut contains approx.

600 ppm Auramine O by LC/MS/MS

Also E124 Red (Ponceau 4R)
The FSMA Implementation Phase II - Import Controls Workgroup is a cross-cutting workgroup charged with developing a multi-year strategy for ensuring industry compliance, where appropriate, and operationalizing and implementing oversight programs for FSMA Import provisions. Import programs under this workgroup include FSVP, VQIP, Import Certification, Accredited Third Party, Systems Recognition, and Lab Accreditation.
Mutual Reliance Project

NY/FDA: Sharing laboratory data/results
States’ Role in imported foods

- Sharing Information (Insp/Sample)
- Recovery Efforts
- Coordinated Enforcement
- Integrated Training
- Audit Importer Verification Activities and Documents
- Importer Inspections
- 3rd Party Audits of US Manufacturers