

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

121<sup>st</sup> AFDO Annual Educational Conference

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Steve Stich



**Agriculture  
and Markets**

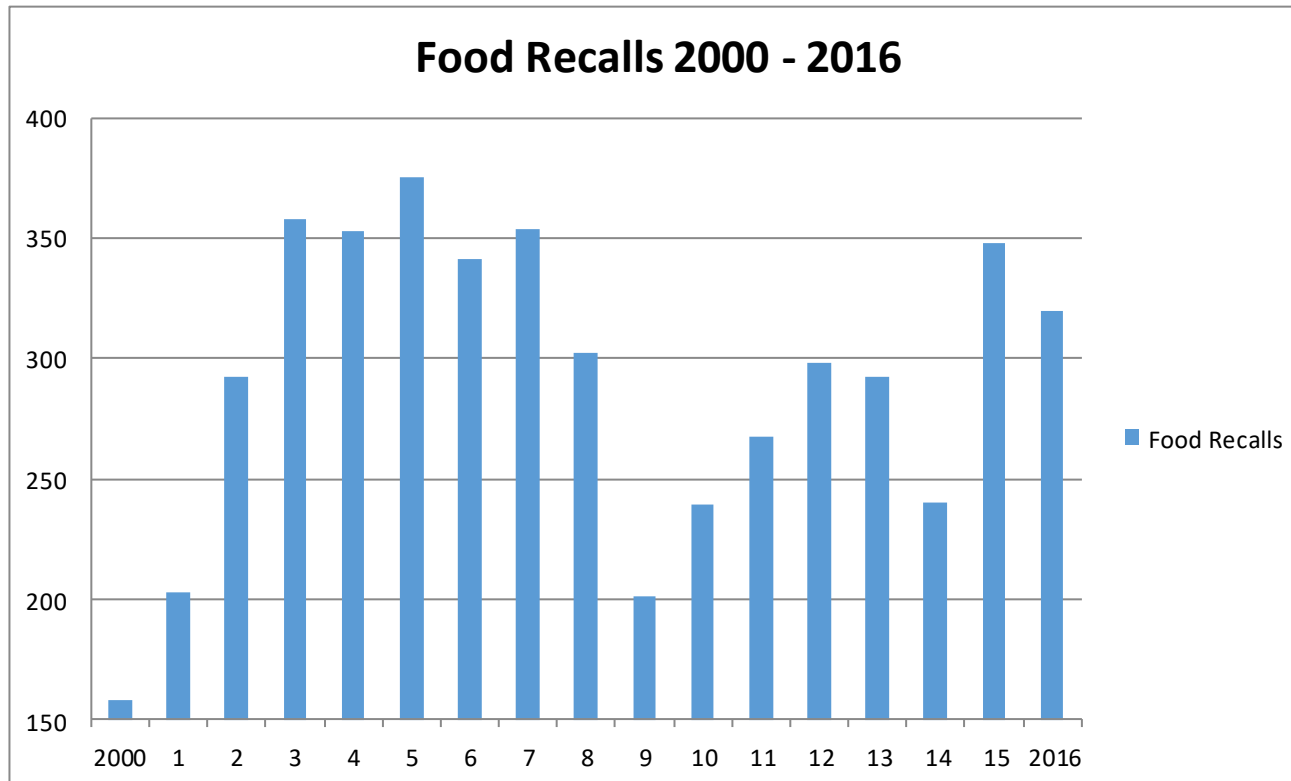
States don't have jurisdiction  
over imported foods right?



**4,880**

**3,431 Imported (70%)**

**1,449 Domestic**





# States' Role: Imported Foods

- Sharing Information (Insp/Sample)
- Recovery Efforts
- Coordinated Enforcement
- Integrated Training

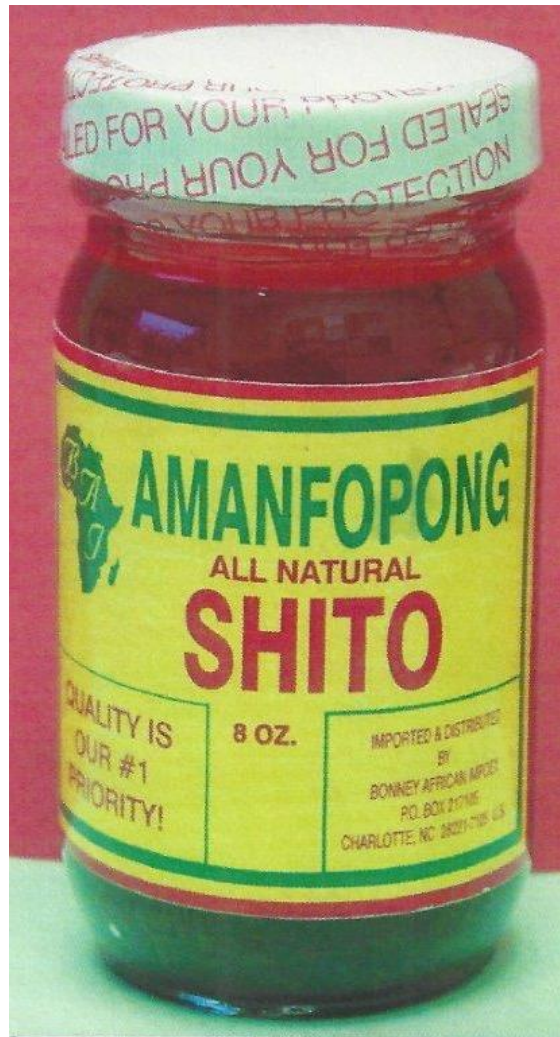




<u>ANALYSIS</u>	<u>RESULTS</u>	<u>INTERPRETATION</u>
APPEARANCE	1.00 Unopened Glass Bottle/Jar GIGI MASTER DELICIOUS FRIED FISH, DD 19 2019 0425, SS	
HISTAMINE	> 500 PPM	ADULTERATED
Comments: Above FDA tolerance of 50 PPM.		.....



<u>ANALYSIS</u>	<u>RESULTS</u>	<u>LABEL CLAIM</u>	<u>INTERPRETATION</u>
APPEARANCE	2 Unopened Glass Bottle/Jar ODT WET BEAN CURD, 22.01.2016 22.01.2018, SS		
pH	5.1		ADULTERATED
ALCOHOL	20.2 %		ADULTERATED
Comments: Alcohol tested from aqueous layer.			



## ANALYSIS

pH

WATER ACTIVITY

## RESULTS

5.7

0.97

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.

## INTERPRETATION



# 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:

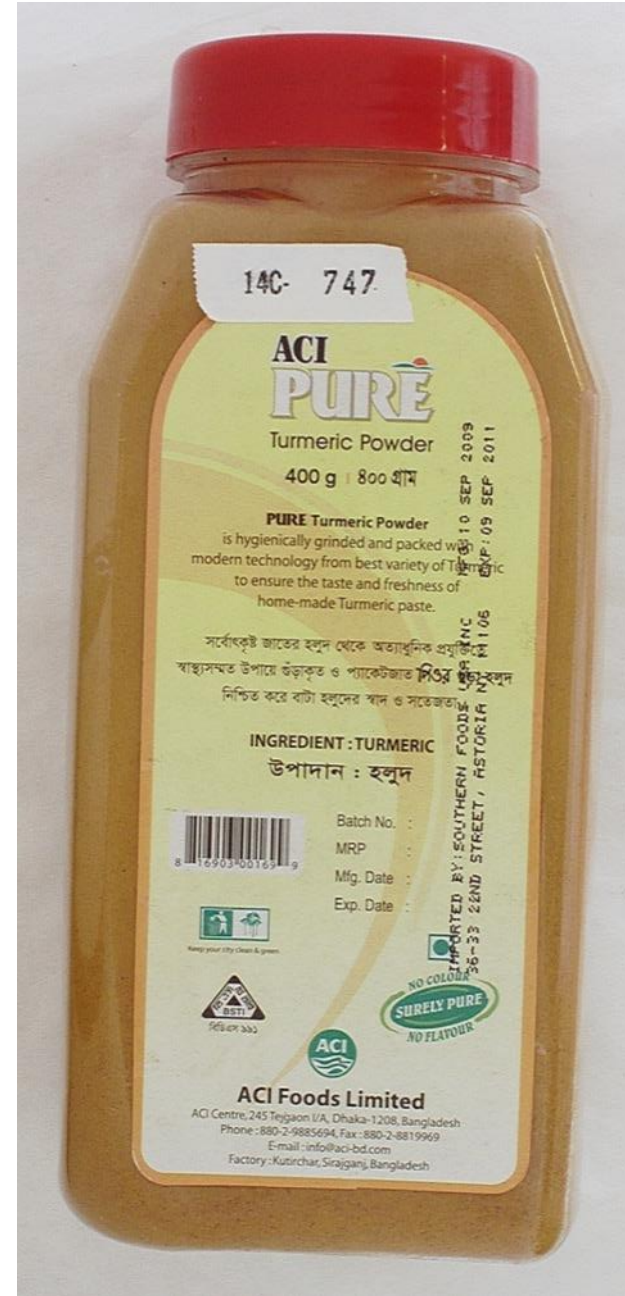
Lead Chromate

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

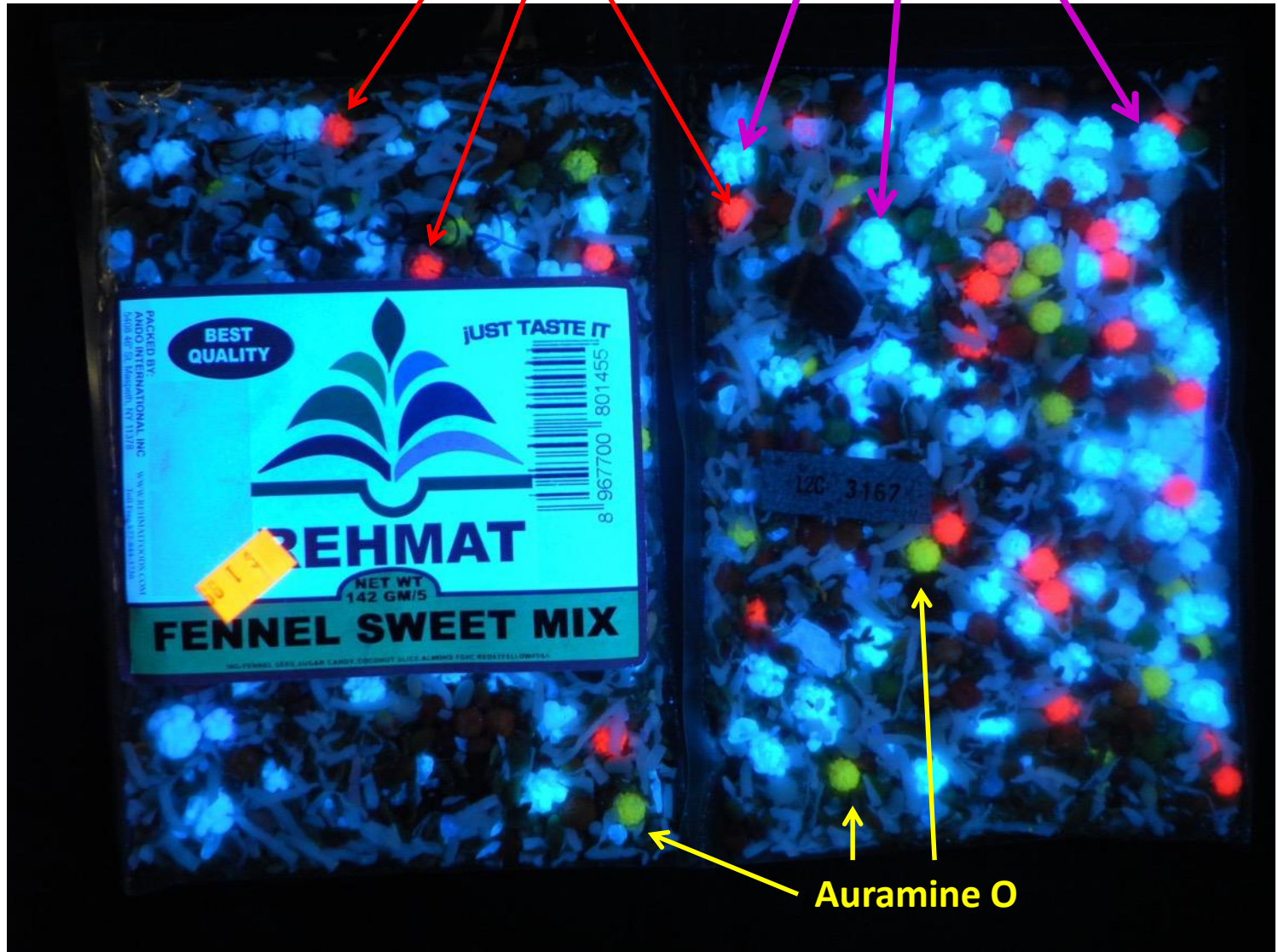
Fluorescent  
Brightener?



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

Fluorescent brighteners ?

Rhodamine B



Auramine O

# Dried Tapioca Pearl

Origin: Vietnam

Contains:

Rhodamine B

Auramine O

Malachite Green

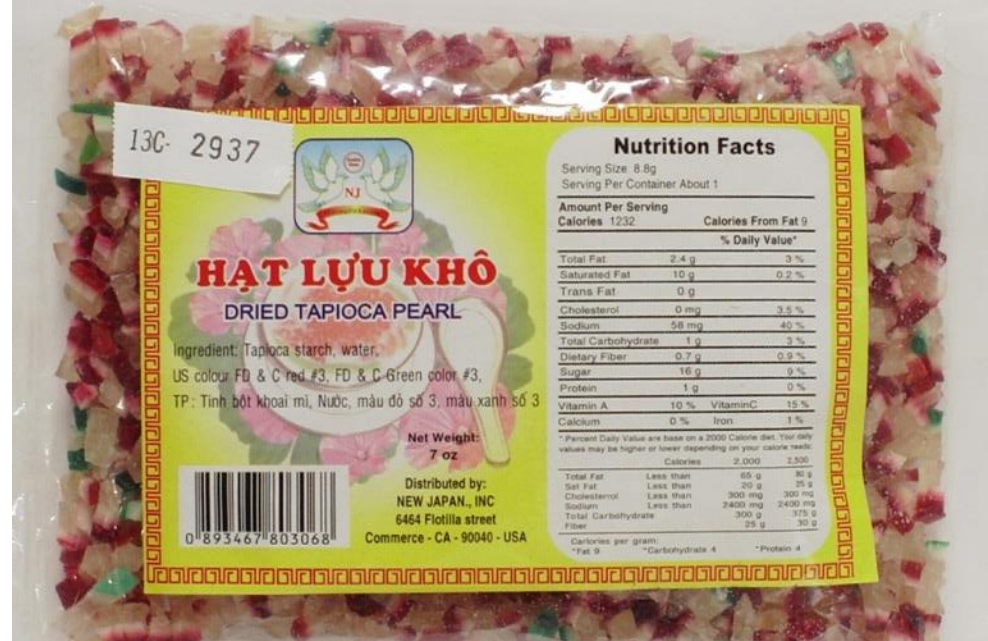
(as a colorant)

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
- 3<sup>rd</sup> Party Audits of US Manufacturers