

# Naturally Boulder Education Series:

Food Safety Modernization Act and Foreign Supplier Verification - What you need to know to ensure your Food company is compliant

## Panel Includes:

**Nancy Scharlach**, Chief Technical Director , FSMA International

**Scott Sellers**, Enterprise Sales Executive, TraceGains

**Jeni Lamb Rogers**, Attorney, Faegre Baker Daniels

# Introduction to the Food Safety Modernization Act (FSMA)

Presentation for Naturally Boulder  
September 20, 2018

Jeni Lamb Rogers, Attorney  
PCQI Human Food, PSA Trainer of Trainers

# DISCLAIMER

This presentation is designed to provide general information on pertinent legal topics, and the statements are made for educational advice. They do not constitute legal advice, and do not necessarily represent the views of Faegre Baker Daniels LLP or any of its attorneys other than myself. This presentation is not intended to create an attorney-client relationship between you and Faegre Baker Daniels LLP. If you have specific questions as to the application of the law to your activities, you should seek the advice of your legal counsel.

# What we'll cover...

- ▶ What is FSMA?
- ▶ Seven regulations
  - ▶ Focusing on Preventive Controls for Human Food and Sanitary Transport
- ▶ **“I have co-packer. How does FSMA affect me?”**



# What is FSMA?

- ▶ Food Safety Modernization Act
- ▶ Signed by President Barack Obama January 4, 2011
- ▶ Increased power and responsibility for the FDA
  - ▶ Required more frequent inspection by the FDA
  - ▶ Increased FDA's access to records
  - ▶ Granted FDA authority to suspend food facility registration
  - ▶ Provided FDA mandatory recall authority for food
- ▶ Shifted the focus of food safety from a reactive to preventive approach
  - ▶ A level playing field domestically and internationally
  - ▶ Throughout the value chain from field to fork... (except retailers)
  - ▶ Embodied in Seven Statutorily Mandated Regulations

# FSMA'S Magnificent Seven



# The PCHF in Four Steps and Two Principles

## Four steps:

1. Identifying hazards that make food unsafe
2. Determining who should control that hazard
3. Controlling the hazard (in a valid way)
4. Verifying that the control is implemented

## Two Principles:

1. Documenting that entire process (at the time of performance)
  2. Have qualified people doing these things
- ▶ Focus on Preventive Controls for Human Food
    - ▶ All of these things must be done on an individual product basis. FDA expects you to start with the ingredient deck for your product and work your way forward.

# What hazards make food unsafe?

## ▶ Biological



## ▶ Chemical



## ▶ Physical



- ▶ When are they likely to occur?
- ▶ How likely are they to occur?

In FSMA Speak – “The Hazard Analysis”

Must be performed by a “Preventive Controls Qualified Individual”

# Who should Control the Hazard and How?

## ▶ Food manufacturers

### ▶ Only three kinds of controls

1. Sanitation Control
2. Process Control
3. Allergen Control

### ▶ In FSMA Speak: “The HARPC Plan” or “Food Safety Plan”

## ▶ Supplier

### ▶ Supply Chain applied control

### ▶ Complying with the applicable regulation

- ▶ Preventive Controls or Produce Safety regulation

### ▶ In FSMA Speak: “The Supply Chain Program”

Must be drafted by a PCQI

# Monitoring and Verification

- ▶ You must ensure that your controls are effective
  - ▶ Key area of focus: keeping Ready to Eat foods safe when they are exposed in the manufacturing environment
  - ▶ How do you know that sanitizing the surface area works?
  - ▶ You monitor the presence pathogens in your facility

In FSMA Speak: “The Environmental Monitoring Program”

See FDA, [Draft Guidance for Industry: Control of \*listeria monocytogenes\* in Ready-To-Eat Foods](#)

Must be reviewed by a PCQI within 7 days of generation

# Sanitary Transport

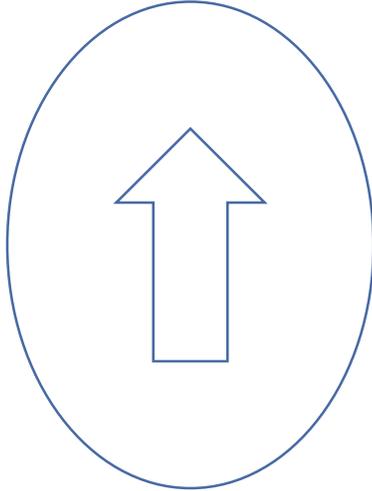
- ▶ Bulk foods (glycerin, grain)
- ▶ Foods that are not packaged in an enclosed container (produce)
- ▶ Foods requiring time and temperature control for safety
- ▶ Create specific responsibilities for loaders, shippers, and carriers
  - ▶ Get the opportunity to allocate responsibilities contractually.



# Enforcement Insights: Inspection, Documentation, and Prevention

- ▶ FSMA is as much about analyzing the problem correctly and writing it down
- ▶ Increase in inspection is still just a one time snapshot
- ▶ Documents show the state of the facility when FDA isn't there
- ▶ FDA has left the period of “educate while we regulate” with large facilities. It expects that manufacturers will now have the following documents in place:
  - ▶ Product Specific Hazard Analyses and Food Safety Plans
  - ▶ A comprehensive written Environmental Monitoring Program for *listeria monocytogenes* in Ready to Eat Foods
  - ▶ A comprehensive supply chain program

# FSMA'S Increased Inspection Requirements



## HIGH RISK FACILITIES

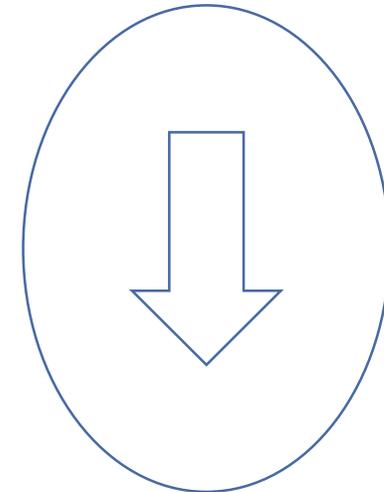
At least once in 5 years after passage of FSMA

- ▶ All high risk facilities by the end of 2016
- ▶ Not less than every three years after

## LOW RISK FACILITIES

At least once in 7 years after the passage of FSMA

- ▶ All low risk facilities by the end of 2018
- ▶ Not less than every five years after



# FDA Inspection and Enforcement Process

## OBSERVE

FDA has the right to inspect at a reasonable time and in a reasonable manner

## REQUEST

Asks for all documents to show compliance with regulations & all documents where FDA has a reasonable belief the product is adulterated

## PHOTOGRAPH

If you don't object- FDA will photograph of various processes, storage, etc.

## SWABATHON

Take 200+ samples of product or test for microbial contamination on equipment

## CONCLUSION

### FORM 483

Identifies "Findings of Significance"

- 15 days to respond

### WARNING LETTER

Escalated to a Warning Letter

- 15 days to respond

### REFERRAL

- Office of Criminal Investigation
- Local AUSA Attorney's Office in the Department of Justice

**“I have a co-packer, how does FSMA affect me?”**

# Cannot contract away your obligation to put safe food into interstate commerce

- ▶ **If your name is on the product, FDA will hold you responsible as the manufacturer**
  - ▶ You could be presented with information from the agency that suggests you should **recall** the product
  - ▶ If you refuse, FDA can **mandate the recall**
- ▶ FDA can suspend the food facility registration of your co-packer
- ▶ **You can also pay a criminal fine or go to prison.**
- ▶ **Prohibited acts are punishable by up to 1 year in prison, \$100,000 criminal fine for an individual, \$200,000 for a corporation *per occurrence***
  - ▶ **Adulteration**
    - ▶ food containing any added poisonous or deleterious substance
    - ▶ food prepared, packed, or held under insanitary conditions
    - ▶ Introducing or causing food to be introduced into interstate commerce that was produced at a facility not in compliance with the regulation requirements



***If it's in your facility, it's in your product...***



**QUALITY THROUGH RESEARCH**

# Legal Obligations Continued

- ▶ **Regardless of your FDA compliance, if you introduce an unsafe product into interstate commerce you will be sued.**
  - ▶ Strict liability
  - ▶ However, *Negligence per se* theories in product liability often put your FDCA compliance at the heart of a product liability suit

# The Park Doctrine – United States v. Park (1975)

- ▶ Unlike most criminal statutes, no “mens rea” or knowledge requirement
- ▶ Violating the FDCA is **strict liability**
  - ▶ If you are an owner or operator of a food facility, FDA charges you with the ability to discover a violation
  - ▶ As a manager, one can go to prison even if one doesn't know about the violation or had no part in it

## EXAMPLES OF SENTENCES



# But FSMA should affect the way you contract ...

- ▶ FSMA has increased costs of getting started with a contract manufacturer
  - ▶ The contract manufacturer must approve suppliers of ingredients for which a hazard has been identified.
    - ▶ Brands can perform verification activities.
    - ▶ If you are a brand that has a separate contract with a supplier of an ingredient, you must have provisions in your contract that allow the contract manufacturer to perform this approval function. You have about one year to modify your agreements to make that happen.
  - ▶ Your agreement should allocate responsibility for the costs of compliance
    - ▶ Who pays for the development of the food safety plan for your product?
    - ▶ Can you take it with you if you need to go?
  - ▶ Sanitary Transport obligations?
- ▶ After things have gone wrong
  - ▶ What provisions are in place for FDA to treat your documents disclosed by your co-packer as confidential commercial information?
  - ▶ What kind of indemnification provisions do you have?
  - ▶ Caps and limitations on liability?
  - ▶ Who pays for the cost of a recall?
  - ▶ Insurance? Recall Insurance? Product liability?

THANK YOU!



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# Obligations of Qualified Facilities

- ▶ Very small business
  - ▶ Less than \$1,000,000 average annual sales during the 3 year period preceding the applicable calendar year plus the market value of food manufactured, processed, or held without sale
- ▶ Facilities selling to qualified end users > sale to all other purchasers, and less than \$500,000 average annual sales during the 3 year period preceding the applicable calendar year
- ▶ Must submit a qualified facility attestation form to the FDA before December 17, 2018
- ▶ Must keep records to show you either are implementing preventive controls, or following state, tribal, or foreign applicable food safety regulations

**PREPARED AND PRESENTED BY: NANCY SCHARLACH**

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Lead Instructor, FSPCA Preventive Controls for Human Food

Lead Instructor, International HACCP Alliance

Registered SQF Consultant – High Risk Processing



**FSMA INTERNATIONAL**

GLOBAL SUPPORT FOR FSMA COMPLIANCE

# FOREIGN SUPPLIER VERIFICATION PROGRAMS (FSVP)

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w – www.fsmainternational.com

**Key  
Points  
Today**



**FDA Registered Facilities; Foreign vs. Domestic**



**FSVP Purpose and Rule Overview**



**Products and Countries Under Scope of FSVP**



**FSVP Plan Requirements**



**QUESTION...**

***How many of you directly import  
or use imported ingredients?***



## FDA Registered Facilities

As of February 4, 2016:

- Domestic (U.S.) registrations: **88,356**
- **Foreign registrations: 212,183**
- **Total: 300,539**

# PURPOSE OF FSVP

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## Foreign Suppliers = U.S. Level of Public Health Protection

- Your FSVP Plan must ensure that your foreign supplier is:
  - Producing food using processes and procedures that provide **at least the same level of public health protection** as required under the **risk-based preventive controls** requirements in **21 CFR part 117** or part **507** or **produce safety regulation**, if applicable; **AND**
  - Producing the food in compliance with sections **402 (regarding adulteration)** and **403(w) (regarding labeling human food for the presence of major food allergens)** of the FD&C Act.

# KEY PRINCIPLES OF FSVP RULE

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- **Importers share responsibility with foreign suppliers** to ensure safety of food imported into the U.S.
- FSVP requirements are **risk-based** (according to types of food, types of hazards, and supplier performance)
- Importers have **flexibility** in how they meet requirements



# DOES FSVP APPLY TO MY SITUATION?

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- The FSVP regulation applies to **all** human and animal food offered for import into the U.S., **unless exempted**.
- In other words, whether or not the FSVP regulation applies to your situation is based on the **human and/or animal food you import**.
- **Most food(s) will require an FSVP.**

# WHEN DO MODIFIED REQUIREMENTS APPLY?

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- If you are a “Very Small Importer”
- If the imported food is from “Certain Small Foreign Supplier(s)” (Qualified Facilities)
- If the imported food is from foreign supplier(s) in countries with food safety systems **recognized by FDA** as **“comparable”** for certain foods under **Systems Recognition**
  - **Canada, Australia, New Zealand**
- If you import **dietary supplements** or dietary supplement components



# EXEMPTED FOODS

## (FOODS NOT COVERED BY FSVP)

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- Foods under FDA Hazard Analysis and Critical Control Points (**HACCP**) rules (**Seafood and Juice**)
- **Alcoholic** beverages (certain conditions)
- Food for **research or evaluation** (subject to certain requirements)
- Food that is imported for processing and future export (**no distribution in the U.S.**)

# EXEMPTED FOODS (cont.)

## (FOODS NOT COVERED BY FSVP)

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- Food for **personal consumption**
- **USDA/FSIS:** Certain **meat, poultry, processed egg products** (products subject to Federal Meat Inspection, Poultry Products Inspection, and Egg Products Inspection Acts), and *Siluriformes* spp. fish, including catfish

# FSVP STANDARD REQUIREMENTS

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1. Conduct a **hazard analysis** of the food, including hazard identification and hazard risk evaluation
2. Conduct an **evaluation** of the foreign supplier's food safety performance and risk posed by the food
3. **Approve** the foreign supplier (based on above evaluations)
4. Establish written procedures to ensure that food is **imported only from approved foreign suppliers** (with limited exceptions)

# FSVP STANDARD REQUIREMENTS (cont.)

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5. Determine and apply appropriate **verification activities** and assess results
  6. Implement **corrective action(s)**, if needed
  7. **Reevaluate** foreign supplier
  8. **Identify the FSVP importer** at entry
  9. Keep required **records and documentation**
- 



# FSVP vs. Supply Chain Preventive Controls

VERY SIMILAR APPROACH, BUT SOME MINOR DIFFERENCES:

## FSVP

- **Qualified Individual** Approves Supplier
- Requirement for all (USA) **FSVP Importers of Record** to share the food safety responsibility with the foreign supplier
- Verify the Foreign Supplier is **controlling the relevant hazards** ongoing that is outlined in a hazard analysis (requires a **Qualified Individual** to complete the technical reviews)
- Obtain '**relevant food safety documents**' specific to factory locations

## Supply Chain Preventive Control

- **PCQI** Approves Supplier
- Required when a (USA) Supplier is controlling the hazard **identified in the Preventive Controls Food Safety Plan** done by Receiving Facility/**PCQI**
- Verify the Supplier (Foreign or Domestic) is controlling the hazard (requires a PCQI to oversee the technical reviews) (could involve collaboration with Importer/Broker)
- Obtain '**relevant food safety documents**' specific to the factory location



# FDA IMPORTED FOOD PAST PROBLEMS

Food/Origin	Problem	Date	Action
<b>Cilantro from Mexico</b>	<i>Cyclospora</i>	2013-2017	Import Alert
<b>Pet food from China</b>	Melamine	2007	Recall/ Import Alert
<b>Papaya from Mexico</b>	<i>Salmonella</i>	2011, 2017	Recall/ Import Alert
<b>Strawberries from Egypt</b>	Hepatitis A	2016	Recall/ Import Alert
<b>Various food items from Japan</b>	Radionuclide Contamination	2011	Import Alert



# THANK YOU!

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# HOW TECHNOLOGY SIMPLIFIES FSMA COMPLIANCE

Scott Sellers - Enterprise Sales Executive



Companies today are awakening  
to a new era of digital business



**NETFLIX**



**The business environment  
has changed and  
continues to rapidly  
evolve...**

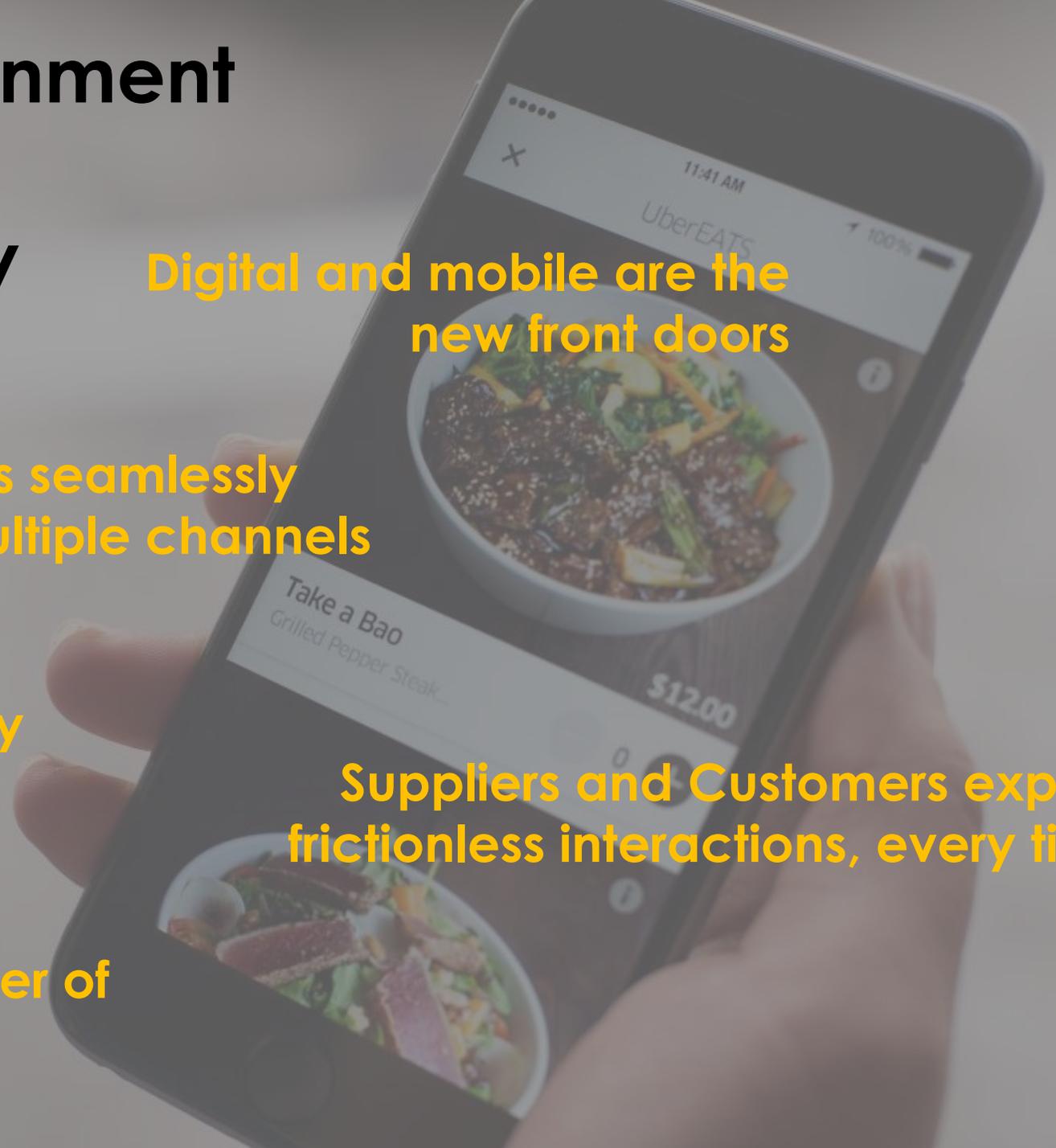
**Digital and mobile are the  
new front doors**

**Data flows seamlessly  
across multiple channels**

**Time is the new currency**

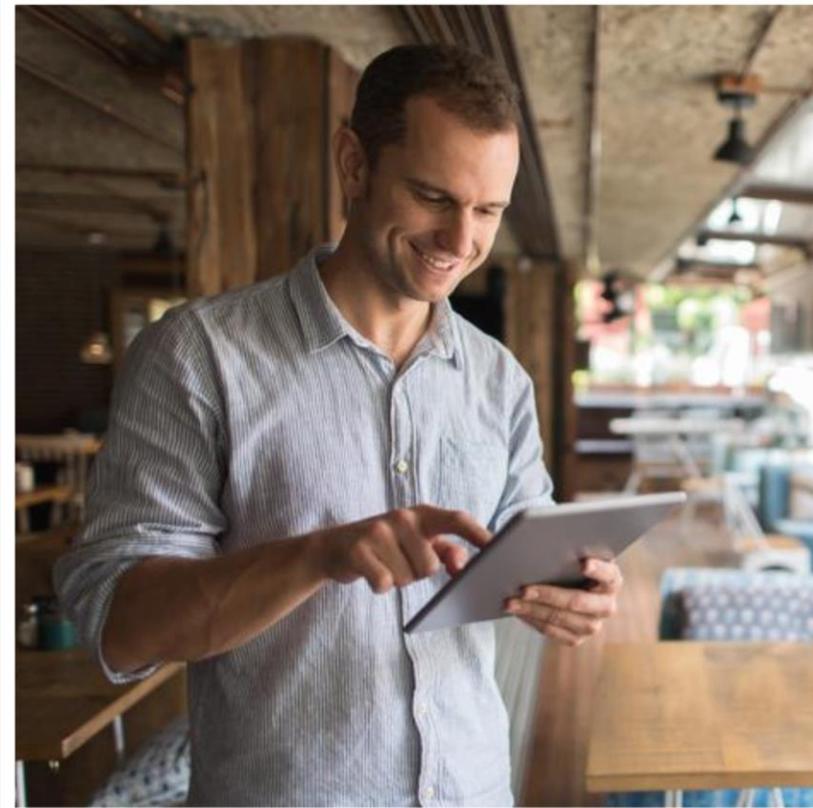
**Suppliers and Customers expect  
frictionless interactions, every time**

**User experience is a key driver of  
who wins and loses**





# FSMA PAIN POINTS



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**REVOLUTIONIZE INFORMATION EXCHANGE**  
ACROSS THE SUPPLY CHAIN

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**What are the top FSMA compliance challenges companies seek to solve with a technology solution?**

- 1. Record keeping**
- 2. Supplier management**
- 3. Ingredient sourcing**

# Challenge #1: Recordkeeping





# Configurable Item Risk Dashboard

TraceGains  
SMC Butterhouse Inc.

Reports

Suppliers 5

Items Supplied

Documents

POs

COAs

QA

CARs

Receiving

Market Hub

Need Help?

Configuration



Item Risk - Dairy

Show Inactive

Filter

Clear

Import

Export

Item ID	Item Name	Item Risk Group	Item Risk Level	Item Risk Score	Microbial Inspection	Biological Hazard	Chemical Hazard	Physical Hazard	Economic Hazard	Rework Done	Item Inspection
15I-ANA	Anhydrous Milk Fat Concentrate 10484P	Dairy	High Risk	19	No	Yes	No	Yes	No	No	No
TG-MLK	Whole Milk	Dairy	High Risk	19	Yes	Yes	No	No	No	No	Yes
TG-GDA	Gouda Cheese	Dairy	Medium Risk	15	Yes	Yes	No	Yes	No	No	Yes
05--SWS	Swiss Cheese - 50	Dairy	Low Risk	4	No	No	No	No	No	No	Yes
TG-SSB	Spray Sweet-Powder Buttermilk	Dairy	Low Risk	4	Yes	No	Yes	No	No	No	Yes
01U-SPS	Spray Sweet Powd.Buttermilk	Dairy	Low Risk	2	Yes	Yes	No	No	No	No	Yes
AP_14s45	Sweet Milk	Dairy	Low Risk	2	Yes	No	No	No	No	Yes	Yes
NDM001	Nonfat Dry Milk Powder	Dairy	No Risk Indicated	0	Yes	No	No	No	No	No	No
NDM001	Nonfat Dry Milk Powder	Dairy	No Risk Indicated	0	Yes	No	No	No	No	No	Yes
TG-BLU	Blue Cheese	Dairy	No Risk Indicated	0	Yes	No	No	No	No	No	Yes
TG-COT	Cottage Cheese	Dairy	No Risk Indicated	0	Yes	No	No	No	No	No	Yes

# Mapping for GFSI or FSMA Standards

DROP FILES HERE

All Documents ▾

Show Archived

Manage Dashboards

Filter...

All Documents

BRC Documents

FSMA Documents

SQF Ed. 7

SQF Ed. 8

Type ▲

Doc Status

Workflow

Effective Date

Expiration Date

File Name

<input type="checkbox"/>		Type ▲	Doc Status	Workflow	Effective Date	Expiration Date	File Name
<input type="checkbox"/>		1.1.10 - Root Cause Resolution of any Pre...	Missing				
<input type="checkbox"/>		1.1.2 - Objectives of Food Safety Program	Missing				
<input type="checkbox"/>		1.1.3 - Minutes of Mgt Reviews of BRC Pro...	Missing				
<input type="checkbox"/>		1.1.4 - Meeting schedule for meetings to di...	Missing				
<input type="checkbox"/>	↑	BRC 1.1.6 - Plan for Informing Staff about Latest...	Missing				
<input type="checkbox"/>	↑	BRC 1.1.9 - Minutes of audit meetings	Missing				
<input type="checkbox"/>	↑	BRC 1.2.1 - Annotated Org Chart from Food Saf...	Missing				
<input type="checkbox"/>	↑	BRC 2.1.1 - Plant HACCP Plan	Missing				

# Can you prove it?

## If it's not documented, it didn't happen!



# Challenge #2: Supplier Management



# How Can Technology help with FSMA

Network  
suppliers and  
customers  
seamlessly share  
documentation

Extract data  
from thousands  
of industry  
required  
documents

# Allergen Dashboard

Major Allergens  Show Inactive

Filter Clear Import Export

Item ID	Item Name	Supplier ID	Supplier Name	Item Status	Item Action	Peanut	Egg	Tree Nuts	Dairy	Crustaceans	Mollusks	Gluten	F
07-TNL	Tiger Nuts	000047	Hondo Food Distributors	Warning	Accept	No	No	No	No	No	No	No	No
0A-FLF	White Flour	000041	Basic Ingredients, Inc. - Minneapolis		Accept	No	No	No	No	No	No	No	No
0A-FLF	White Flour	000009	Baking Supplies Central	Warning	Accept	Same Manufacturing Plant	No	Same Manufacturing Plant	No	No	No	No	No
0A-FLF	White Flour	000014	Byco Food Products		Accept	No	No	No	No	No	No	No	No
0A-FLF	White Flour	000042	Basic Ingredients, Inc. - Green Bay	Out Spec	Accept	No	No	No	No	No	No	No	No
0A-JAJ	Jasmine Absolute Egyptian	000042	Basic Ingredients, Inc. - Green Bay		Accept	No	No	No	No	No	No	No	No
0A-JAJ	Jasmine Absolute Egyptian	000049	NutraGlobe		Accept	No	No	No	No	No	No	No	No
0A-JAJ	Jasmine Absolute Egyptian	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
0A-JAJ	Jasmine Absolute Egyptian	000041	Basic Ingredients, Inc. - Minneapolis		Accept	No	No	No	No	No	No	No	No
0A-RAR	Raisin 70 Brix	000049	NutraGlobe	Warning	Accept	No	No	No	No	No	No	No	No
0A-RAR	Raisin 70 Brix	000004	Azina Foods - Seattle		Accept	No	In Product	No	In Product	No	No	No	No
0B-IDI	Idf Frozen Chicken Broth 32%	000026	Indiana Co-Op Farms		Accept	No	No	No	No	No	No	No	No
0E-FDF	Fd&C Yellow #5 Granular	000035	Number One Ingredients, Inc.		Accept	No	No	No	No	No	No	No	No
0E-OIO1	Oil Lemon Calif. Type C.P. Extra Fcc	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
0H-OIO	Oil Thyme-Red	000024	H. Umberge & Co.		Accept	No	No	No	No	No	No	No	No
0I-OIO2	Oil Dill Weed 30-32%	000024	H. Umberge & Co.		Accept	No	No	No	No	No	No	No	No
0I-OIO4	Oil Pimento Leaf N.F.	000024	H. Umberge & Co.		Accept	No	No	No	No	No	No	No	No
0O-MOM	Molasses Light Amber Unsulfured	000009	Baking Supplies Central	Warning	Accept	Same Manufacturing Plant	No	Same Manufacturing Plant	No	No	No	No	No
0O-SFGS	S.E.Foenugreek Seed Fr	000031	K Lynn Specialty Foods, Inc.		Accept	No	Same Manufacturing Plant	Same Manufacturing Plant	No	No	No	No	No
0P-OIO	Oil Spearmint N.F.	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
0R-OIO	Oil Grapefruit	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
0U-AUA	Aubepine Liquid (Anise Aldehyde)	000025	Hepa Ingredients & Flavors		Accept	No	No	No	No	No	No	No	No

# Scorecard/Compliance



## Supplier Scorecard Report

Westward Natural Foods

FOR PERIOD From: To:

Supplier Name:	<a href="#">Click here to enter text.</a>	Supplier Contact:	<a href="#">Click here to enter text.</a>
Supplier ID:	<a href="#">Click here to enter text.</a>	Contact Tel Num:	<a href="#">Click here to enter text.</a>

Your TOTAL Supplier Score (Out of a possible 100 points) **100**

Score Components:	Criteria for Supplier Score	Score	
<b>FUNCTIONAL</b>	Supplier Docs Current (Specification, Nutrition) % of Supplier CoAs that are InSpec	5 Pts if ALL Current, Else 0 10 Pts if 100% In Spec 7 Pts if 99.0% to 99.9% In Spec 3 Pts if 97.0% to 98.9% In Spec 0 Pts if less than 96.9% In Spec	5 <b>10</b>
	% of CoAs Involved in Floor Feedback Event (FF) (All Issues EXCEPT for Food Safety)	15 Pts if No FF 12 Pts if 1.0% or fewer have FF 6 Pts if between 1% and 5% have FF 0 Pts if more than 5.0% have FF	15
	Supplier Survey Questionnaire (all but Food Safety)	5 Pts if Questions ALL Conform, Else 0	5
	<b>Score This Section (Max 35)</b>		<b>35</b>
<b>FOOD SAFETY</b>	Supplier Docs Current (Country Origin, Audit, MSDS) % of Receiving Inspections that have no Foreign Material or Contamination noted (Clean)	5 Pts if ALL Current, Else 0 10 Pts if 100% Clean 7 Pts if 99.0% to 99.9% Clean 3 Pts if 97.0% to 98.9% In Clean 0 Pts if less than 96.9% Clean	5 <b>10</b>
	% of CoAs Involved in Floor Feedback Event (FF) (Food Safety Issue)	15 Pts if No FF 0 Pts if only 1.0% to 2.0% have FF -37 Pts if more than 2.0% have FF	15
	Supplier Survey Questionnaire (Food Safety Questions)	10 Pts if Questions ALL Conform, Else 0	10
	<b>Score This Section (Max 40)</b>		<b>40</b>
<b>COMMERCIAL</b>	Supplier Docs Current (Guarantee, Country Origin, Insurance, Kosher)	10 Pts if ALL Current, Else 0	10
	% of CoAs that have to be processed as EP-M (EP-M means manually entered versus automatically processed.)	15 Pts if 0% EP-M 10 Pts if 1% or less EP-M 5 Pts if 1% to 3% EP-M 0 Pts if more than 3% EP-M	15
	<b>Score This Section (Max 25)</b>		<b>25</b>

About Your Score: 90 – 100 Very Good      80 – 89 OK      70 – 79 Warning / Concerning      Below 70 OutSpec

Doc Ref #: Supplier Scorecard      Revision: 2014.01.07a      Effective Date: 2014.01.31      Page 1 of 1

# Challenge #3: Ingredient Sourcing



# TraceGains Network & Market Hub



**1,000+**  
Customer Sites



**15,000+**  
Supplier Sites



**600,000+**  
Supplier Documents



Suppliers in **91**  
Countries

**TraceGains Powers 28 of the Top 100  
Food & Beverage Companies**



**100,000+**  
Sourceable Items



**SaaS 10+**  
Years in the Cloud



Reduce NPD  
Time by **20%**



**FREE**  
for Suppliers

# THE "TOP 100"

# TRACEGAINS® IN ORGANIC/NATURAL FOODS



# Advanced Search Capabilities



**TraceGains** | Reports | Suppliers 2 | Items Supplied | Documents | POs | COA Monitor | COAs | QA | CARs | Receiving | Need Help? | Configuration |

Market Hub Search | Search Items / Search Results | [Submit Feedback](#)

Search Suppliers  
Search Items

Product Accelerator  
Products  
Items  
Searches

8 Results for "New Search"

Search Criteria

Sort by: Item ID

- SDS PS N A COO IQ SR SQ**  
10 Degrees Dark Chocolate Curls, 6 X 4 kg 10DDKCr101  
Cocoa / Chocolate  
Foodlinks, LLC Europe Chocolate Company
- SDS PS N A COO IQ SR SQ**  
10 Degrees Dark Chocolate Shavings, 6 X 2.5 kg 10DDKSHV11  
Cocoa / Chocolate  
Foodlinks, LLC Europe Chocolate Company
- SDS PS N A COO IQ SR SQ**  
10 Degrees White Chocolate Curls, 6 X 4 kg 10DWhCr103  
Cocoa / Chocolate  
Foodlinks, LLC Europe Chocolate Company
- SDS PS N A COO IQ SR SQ**  
10 Degrees White Chocolate Shavings, 6 X 2.5 kg 10DWhShv10  
Cocoa / Chocolate  
Foodlinks, LLC Europe Chocolate Company
- SDS PS N A COO IQ SR**  
Milk Chocolate CHM-F15A588-07-000

Search Items [Clear All](#)

1 Search for  Name, ID, or Category?

Filter [Clear All](#)

**Item Type**

- Raw Materials
- Packaging

**Supplier Status**

- Connected

**Document Types**

- SDS (Safety Data Sheet)
- Product Spec
- Nutrition
- Allergens
- COA Template
- Country of Origin
- Item Questionnaire
- Suitability Requirements
- Supplier Questionnaire

**Distance**

**Item Attributes**

- Gluten-free
- Halal
- Ingredient Declaration
- Kosher
- Organic
- PHO-free
- Ready-to-Eat (RTE)
- Vegan
- Non-GMO

Exclude These Words [Create New List](#)

# Reduce New Product Development Time



- ◆ New vendor sourcing
- ◆ New vendor onboarding
- ◆ Specifications negotiation & sign-off
- ◆ Document collection
- ◆ Nutrition label generation (via our integration with ESHA Research' Genesis labeling application)

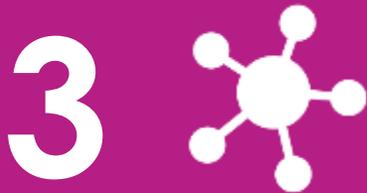
# Recommended Actions to Take



Go digital and start delivering and accessing quality, regulatory and item data from the cloud



Leverage analytics to better understand your business and build stronger relationships with suppliers and customers



Join the Network- bring better, safer products to market more quickly and simplify your Supply Chain



# Thank you!

Scott Sellers- Enterprise Sales Executive  
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