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GCCA Overview

Food Safety Regulatory Reform and Developing Trusted Partners

Summary

The current Food Safety Inspection Service (FSIS) inspection system requires an additional step of inspection at third party logistics (3PL) facilities after meat, poultry, and siluriform products have left the processing plant before being exported to an approved country. This additional inspection includes safety reinspection of 10% to 100% of the product that goes through 3PLs and paperwork verification to ensure product integrity for export. GCCA encourages USDA to develop a Trusted Partner Status program that would enable establishments to complete the export process without requiring reinspection by FSIS personnel.

Background

U.S. meat and poultry exports are worth around $20 billion annually and depend on the credibility of USDA's FSIS inspection system. 3PLs play an essential role in the export supply chain for these products. Products are often transferred from slaughter or processing establishments to 3PLs for storage, consolidation, freezing, and preparation for shipment. These activities do not involve ownership transfer, repackaging, or product alteration and do not introduce additional food safety risk when conducted under established food safety and temperature control programs.

Under FSIS Directive 9000.1 (Export Certification), FSIS inspection program personnel are required to conduct reinspection of export consignments when an export certificate is requested after the product has moved from a producing establishment to a non-producing establishment, including 3PLs. The reinspection process is largely administrative, focused on document and label checks rather than food safety risks. They apply even where products have already passed federal inspection and have remained under continuous temperature control and secure custody. The result is delay, added cost, and inefficient use of limited FSIS resources, without a corresponding public health benefit.

Policy Recommendation

Establish a FSIS Trusted Partner Status (TPS) program built on a graduated, standardized framework. Rather than a single transition to full self-certification, qualified 3PLs would progress through defined tiers — each tied to a demonstrated compliance record and corresponding to a step-down in the rate of routine FSIS reinspection. FSIS retains full oversight, audit, and enforcement authority at every tier. Trusted Partners would be required to:

- Verify product identity, integrity and chain of custody
- Confirm products were federally inspected and passed
- Ensure export labels and documentation meet FSIS and importing-country requirements
- Maintain records on storage conditions and temperature control
- Use trained personnel knowledgeable in export certification rules
- Progress through tiers based on objective, published criteria — not case-by-case discretion — providing certainty and a transparent path forward for participating facilities.

These responsibilities largely reflect activities already performed by compliant operators today.