FMI®
FOOD MARKETING INSTITUTE

May 16, 2008

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

**Re: Third-Party Certification Programs for Foods and Feeds; Request for
Comments (Docket No. 2008-N-0183**

Dear Sir or Madam:

The Food Marketing Institute[1] (FMI) is pleased to respond to the Food and Drug
Administration's (FDA's) request for comments on the notice for third-party certification programs
for foods and feeds. 73 Fed. Reg. 17989 (April 2, 2008). In particular, we wish to share with FDA
our experience in developing and administering an accredited third-party certification program,
Safe Quality Food.

We agree with FDA's assertion that the safety of food for human and animal consumption is
a shared public and private responsibility. Retailers play an important role in maintaining the safety
of food sold in supermarkets and have implemented many prevention programs to ensure a safe and
wholesome supply of food to their customers. But the reach of retailers goes beyond what we can
do to keep food safe in grocery stores and warehouses. In the FDA Food Code, as specified under ¶
3-201.11(A), "Food shall be obtained from sources that comply with LAW." Retailers work
closely with the government and their suppliers to get assurances that they are sourcing products
from suppliers who are producing food in accordance with all U.S. regulations. Some retailers use
accredited third party certification programs to provide additional assurance that their suppliers are
producing or processing food under standards at least equal to, and often beyond, those of the
federal government. Accredited third party certification programs can serve as a mechanism to
independently assess the standards and conditions under which food is produced.

---

[1] Food Marketing Institute (FMI) conducts programs in research, education, industry relations and public
affairs on behalf of its 1,500 member companies — food retailers and wholesalers — in the United States
and around the world. FMI's U.S. members operate approximately 26,000 retail food stores with a combined
annual sales volume of $680 billion — three-quarters of all retail food store sales in the United States. FMI's
retail membership is composed of large multi-store chains, regional firms and independent supermarkets. Its
international membership includes 200 companies from more than 50 countries.

I. Background

The responsibility for inspecting, regulating and enforcing U.S. food safety requirements rests squarely with the Federal regulatory bodies who were given this authority and the appropriated funds to pay for it by Congress. However, the private sector also has a role and responsibility to ensure that food and feed (hereinafter food) are as safe as can be. To help achieve that end, retailers can rely on established systems for assessing and certifying the food safety management systems of suppliers. One such system is the Safe Quality Food program, which FMI owns and administers through the Safe Quality Food Institute (SQFI), a division of FMI.

The Safe Quality Food (SQF) Program is a fully integrated food safety and quality management protocol designed specifically for the food sector. SQF Certification provides an independent and external validation that a product, process, or service complies with international, regulatory and other specified standards, and enables a food supplier to give assurances that food has been produced, prepared and handled in accordance with the highest possible standards.

A. Current Use of Voluntary Third-Party Certification Programs for Foods

FDA has accurately observed that there is a growing number of retailers (supermarkets, wholesalers and food service companies) requiring their suppliers to ensure through certification that food safety practices and management systems are effectively implemented. Additionally, suppliers are requiring food safety assurances from their sources of ingredients and other raw materials throughout the supply chain. The use of independent, accredited third-party certification companies to audit and provide certifications to conforming food manufacturers and suppliers is rapidly expanding on a global basis.

The FDA Notice, however, also includes several statements and references that need to be corrected, clarified or further explained. For example, the Notice makes reference to the Global Food Safety Initiative (GFSI) of which FMI has been a member since its inception. In the Notice, it states that GFSI "requires food suppliers to have a factory audit certification against internationally recognized standards, which include the Safe Quality Food…and GlobalGAP." First, GlobalGAP is not one of the GFSI recognized programs; second, the GFSI does not impose any requirements on retailers or suppliers.

The GFSI was organized in 2000 to pursue continuous improvements in food safety systems globally, to improve food safety while providing the added incentive of promoting cost efficiencies in the supply chain, and, above all, to provide assurance of safer food for consumers worldwide. Prior to the creation of the GFSI, a group of global retailers and their representative associations, including FMI, assessed the current state of audits and assessments of suppliers. It became apparent that the existing system of supplier auditing was fraught with problems – conflicts of interest, unqualified auditors performing assessments, inconsistent standards, lack of accountability and oversight, to name a few. As a result, there was widespread agreement that a more formalized, credible, reliable and consistent approach was needed, and from this evolved the GFSI. The GFSI is a non-profit foundation administered by the CIES-The Food Business Forum, headquartered in

Paris, France. There is a governance structure including an eleven-member Board consisting of retailers, food service providers and manufacturers from around the world and a Technical Committee with over 50 food-safety specialists from all industry sectors. GFSI is an international body whose membership includes over 70 retail companies

The GFSI is not a food safety standard or certification program in and of itself. Rather, the members of the GFSI developed a Guidance Document that outlines the key elements that are expected to be included in a food safety standard and in the supporting system for conformity assessment, collectively referred to as a "scheme." The Key Elements form the basis for all standards and include such elements as food safety management systems, best practices and HACCP. The assessment components specifically address the issues of auditing, certification and accreditation. The role of the GFSI is to evaluate or "benchmark" private sector food safety schemes (the standard and the certification components) against the GFSI Guidance Document and recognize those programs that are fully aligned with the Guidance Document. The Guidance Document has evolved over the years and today we are now benchmarking against Version V.[2] The programs or schemes that are currently recognized by the GFSI as being fully in compliance with the Guidance Document are:

- Safe Quality Food (for both manufacturing and primary on-farm production)
- International Food Standard
- British Retail Consortium
- Dutch HACCP

The GFSI estimates that there are over 20,000 suppliers who have been certified to one of the GFSI benchmarked programs listed above. Most of these certifications have occurred in just the past two years as the understanding and acceptance of recognized certification programs throughout the world has been expanding.

However, the assumption that such programs extend to quality and food defense is not accurate. The GFSI only evaluates the food safety components of a standard. Of the GFSI recognized programs, only the Safe Quality Food Program owned by FMI provides a separate standard for food quality and food defense.

B. Interagency Working Group on Import Safety

We applaud the work of the President's Interagency Working Group on Import Safety and their *Action Plan for Import Safety: A Roadmap for Continual Improvement* (hereafter *Action Plan)*. Recognition of the work being done by the private sector to ensure a safer food supply will provide an added incentive to both retailers and suppliers to further enhance and adopt the use of third-party certification systems.

---

[2] Global Food Safety Initiative, Guidance Document Version V:
http://www.ciesnet.com/pfiles/programmes/foodsafety/GFSI_Guidance_Document_5th%20Edition%20_September%202007.pdf

We believe there needs to be further dialog regarding the recommendations in the *Action Plan* especially as they relate to the application and use of third-party certifications. First, it is absolutely imperative that the differences in language and terminology used by the public and private sectors be rectified to resolve the confusion that has resulted in the misuse or misunderstanding of terms such as "certification" and "accreditation". Even within the *Action Plan*, the intent of the recommendations is not always clear. For example, the *Action Plan* discusses what it calls "mandatory certification programs" and "voluntary certification programs". In essence, an FDA "mandatory certification" would be the same as an FDA mandatory requirement assured through federal inspection. Private-sector certification systems are not intended to replace FDA authority nor does the industry wish to use certification as a substitute for government inspection and enforcement on behalf of the FDA. Private sector certifications are, by their very nature, business to business arrangements that result in a buyer's acceptance of a supplier's product because it meets all of the expectations of the buyer. Standards such as SQF require that the supplier meet all of the mandatory requirements of both the country in which the product was produced and those of the importing country. If a company can not meet regulatory requirements as a minimum, then they will not be eligible for certification. This, however, is not the same as "mandatory certification" whereby the government would mandate that a supplier be certified by an independent body and that such certification can replace government inspection.

We do not support the use of "mandatory certification programs" as envisioned here as FDA already has the authority to mandate its requirements for food safety and to use its existing inspection, verification and enforcement authority to assure such requirements are being met. We believe private-sector certification programs will be more robust and effective if they remain as voluntary programs. As discussed more fully below, FDA could develop a program under which the Agency would recognize certification programs that meet criteria set out by FDA to help the Agency better allocate its resources; however, participation in such certification programs should not be mandated by law.

In part, we agree with and support the *Action Plan* Step 2.1 that recommends FDA be given the authority (where it does not already exist) to require that products under its jurisdiction comply with FDA requirements. However, assurance that such compliance is being met is the role of FDA and should not be "enforced" through the application of mandatory private-sector certifications. Such action would imply that the private sector is responsible for and replacing FDA's authority. We believe that consumer confidence and public expectations will be better served if the FDA develops a plan to use private-sector certifications as a way to assess the risk of products produced by a third-party certificated firm and allocate their resources according to such risks. Those suppliers who are not independently certified should be considered as presenting a higher risk regarding compliance with FDA requirements.

FDA should also further consider establishing a program whereby they would enter into agreements with foreign governments to assure that U.S. requirements are being met. Such a program would require assurances that the foreign government has an equivalent system to that of the U.S. and that periodic review and monitoring of the foreign government system demonstrates compliance. Even in those situations where FDA has established the equivalence of a foreign

government's food safety program and therefore, that firms from the country should be eligible to export food to the U.S., private sector certifications would still be used by the industry to assess and certify individual suppliers.

We agree that FDA should develop a plan to encourage, via incentives, those suppliers who have demonstrated compliance to U.S. requirements by way of independent third-party certification. As stated in the *Action Plan*, "For foreign producers, the ability to participate in voluntary certification programs could allow products from firms that comply with U.S. safety and security standards to enter the United States more quickly. This would facilitate trade, while allowing federal departments and agencies to focus their resources on products from non-certified firms or for which information suggests there may be safety or security concerns."[3]

The *Action Plan* recommends that the federal government develop voluntary certification programs. We disagree. Consistent with the mandates of our food safety laws that impose responsibility for the safety of food on those that produce the food, we believe the development of voluntary certification plans is the responsibility of the private sector. However, the federal government must be in a position to assess private-sector certification programs and determine, based on rigorous criteria, which certifications will be recognized by FDA. To this end, we believe the FDA could model a federal recognition program on the one designed by the private sector for the GFSI. For example, FDA could establish a set of criteria for food safety standards (the Key Elements) which would include compliance to all U.S. federal requirements. In addition, the FDA criteria should include specific requirements on how such certification programs are to be operated, including such things as:

- Accreditation of certification bodies by members of the International Accreditation Forum (IAF) or similar organizations
- Recognition of accreditation bodies compliant to ISO/IEC 17011
- Accreditation of certification bodies compliant with ISO/IEC Guide 65
- Demonstrated auditor competency criteria and pre-requisite qualifications
- Separation of activities to prevent conflicts of interest
- Independence of certification bodies from audited firms
- Separation of standard owner and certification body

As part of this recognition program, FDA's role would be to evaluate, similar to the GFSI benchmarking process, certification programs to determine which programs meet all of the criteria established by the government and can therefore be recognized.

Section 2.3 of the *Action Plan* recommends that FDA be given authority to "accredit" independent third-parties to evaluate compliance. Although this may again be more a matter of terminology, we do not believe FDA should take on the role of an accreditation body. Accreditation requires certain skills and the ability to perform assessments that may not currently reside within

---

[3] *Action Plan for Import Safety: A Roadmap for Continual Improvement.* Page 18.

FDA. It is unlikely that FDA has the expertise and resources to carry out an accreditation function, and such a mandate would require additional funding. FDA may want to consider delegating accreditation to the scope of FDA requirements to a recognized authority such as an IAF accreditation body that performs conformity assessments. The established process of accreditation, certification and auditing is now globally recognized and has proven to be a reliable, rigorous and dependable system.

We support the recommendation to create incentives for foreign firms to participate in voluntary certification programs. Likewise, incentives should be made available to importers who purchase from certified firms. The federal government should establish these incentives, which could include expedited entry at ports, reduced compliance sampling, expedited processing of samples for laboratory testing, and access to CBP's account manager program.

In summarizing our comments on Section I.B. of the Notice, we support the following principles:

- Third party certification should not replace or substitute for FDA inspection and should not be mandatory.
- Third party certification could provide additional assurances of safety.
- Third party certification could provide FDA with important information about the ability of a supplier to meet FDA requirements.
- Foreign and domestic firms should be allowed to voluntarily participate in third party certification programs.
- FDA should implement a system to recognize those programs that use accredited third party certification to assure compliance to FDA requirements

II. Request for Information

1. What domestic and foreign third-party certification programs for suppliers are currently in use by U.S. companies?

In the U.S., many auditing programs are available. However, very few of these are actually accredited by an independent organization to establish that the auditing program meets internationally recognized certification standards to maximize accurate, unbiased assessments. One reason some retailers have asked their suppliers to be certified by accredited third party programs is that the past system of auditing was very unstructured, unreliable, inconsistent and fraught with concerns regarding conflict of interest and lack of credibility. Previously in these comments we have provided a more detailed explanation of the Global Food Safety Initiative (GFSI), an industry-driven program designed to improve the quality, credibility and reliability of auditing and certification for food safety. One of the GFSI recognized programs is Safe Quality Food (SQF) which is owned by FMI and managed through the SQF Institute (SQFI), a division of FMI.

SQF is a complete program (or "scheme" as referred to by the GFSI) that includes the food safety standard (which we call a Code) and the system for certifying compliance to the standard using accredited certification bodies. The SQF Code requires suppliers to meet all regulatory requirements in both the country in which the food is produced and the country(s) to which it is exported. In addition, the Code requires that food safety best practices based on and/or aligned with HACCP, Codex Alimentarius, ISO 9000, the recommendations of the National Advisory Committee on Microbiological Criteria for Foods, risk assessment and food safety management systems be in place. The SQF program includes two Codes, one for manufacturing and the other for primary (on-farm) production. The SQF program is applicable to all types of food and feed. The Codes themselves are transparent documents developed through a stakeholder process.

Within each Code are three Levels of compliance - each Level is designed to indicate the stage of development of a supplier's food safety management system. Level 1 is a standard for food safety fundamentals and includes pre-requisite programs and regulatory compliance. This Level would be used to assess a small or low-risk producer who does not have a sophisticated food safety management system in place. Level 2 is used for those suppliers who have a HACCP system in place, in addition to all the requirements of Level 1. And Level 3 incorporates all of the food safety components of Levels 1 and 2, but also includes a Quality Management System. SQF incorporates these Levels to encourage all suppliers, regardless of size or complexity, to achieve SQF certification, and supports an approach for continuous improvement.

SQF only allows accredited certification bodies, licensed to SQF, to perform audits and issue certifications. In this way, the SQF program is able to maintain assurances about the quality and reliability of the certification. SQF has developed a document, "SQF Guidance on the Application of ISO/IEC Guide 65:1996 General Requirements for Certification Bodies for Certification of SQF Systems" to ensure that certification bodies understand and adhere to the requirements set forth for auditing firms. It is important to note that the SQF Institute does not perform any audits, does not assess conformance to the standard, and does not issue certifications to suppliers. This function can only be carried out by an accredited certification body.

Accreditation bodies such as the American National Standards Institute (ANSI), operating to ISO norms, assess the activities and procedures of the certification bodies to ensure they are in compliance with both ISO guidelines and the SQF Guidance. In this context, accreditation is a third party verification that a certification body is competent to carry out the conformity assessment tasks and that they operate within specified requirements for conducting business. To further assure that the accreditation body is doing its job, SQF also licenses the accreditation bodies and they must be organizations that are part of the International Accreditation Forum (IAF). Accreditation bodies are required to conduct activities such as yearly reviews of certification bodies, conduct "shadow audits" and ensure compliance to ISO Guide 65.

Retailers and suppliers are seeking certification programs in which they have confidence, such as SQF. Currently, there are over 8,000 SQF certified suppliers worldwide. Although most of these companies are outside the U.S., there is a growing number of domestic firms achieving SQF certification, including providers of such products as apples, eggs, meat, snack foods, beverages

and dairy products. It is also worth noting that SQF has not issued any certifications for manufacturers of food or feed in China for over a year, and all previous certifications have expired and were not renewed. The SQF Institute took this action based on our concern that the certification process in China was not being administered in accordance with our requirements. We will not jeopardize our position as an accredited third party certification program if it means lowering our standards. Consequently, we are now in discussion with the Chinese accreditation authority to work towards a new, credible system for certifying suppliers in China.

SQFI prides itself on managing a credible and rigorous certification program. (See attached diagrams.) For example, SQF has the following requirements in place.

Requirements of SQF certification bodies include:
- Operational infrastructure (organization, process, finance and review process)
- Sustainable and compliant procedures and practices
- Ability to meet international standards of Certification Management
- Licensure from SQF to meet the scope of the standard
- Impartiality and management of conflict of interest

In addition, certification bodies must:
- Conduct clear, measurable assessments with a defined process
- Use auditors that are qualified, trained, competent and registered by SQF as eligible to perform the audit in the specific food commodity, process or operation
- Use qualified experts apart from the auditor to review audit results and make certification decisions
- Conduct regular competence reviews of auditors
- Ensure an appeals process is in place
- Classify non-conformities in accordance with the SQF standard
- Implement a corrective action system for resolution and follow-up
- Conduct recertification audits within prescribed time frames to maintain certification status

To maintain certification, SQF audits are done annually. The audit process consists of two parts – a documents review and an on-site audit. The documents review is undertaken to verify that the firm has in place all of the required documents as part of their SQF System. The on-site audit assesses compliance to the standard, ensures that the food safety management system is implemented as documented, and verifies the effectiveness of the system in its entirety. For those firms where the result of the audit does not support annual audit frequency, a six month surveillance audit may be conducted. Annual re-certification audits verify the continued effectiveness of the food safety management system. Specific scoring criteria, procedures for following up on corrective actions, and rules for suspending certification are all included in the SQF Codes and requirements. Information on certified companies is publicly available. However, the details of the audit are the property of the audited firm and are provided only with the permission of the firm.

This system of checks and balances assures the avoidance of conflict of interest, adds confidence to the system and provides the most reliable and unbiased assessment possible.

However, no standard or assessment can guarantee food safety and no certification program should be construed to be a guarantee. Such programs can only assess the compliance to which a company operates their food safety program and the implementation of the best practices we have available.

In general, certification programs such as SQF and the other GFSI-recognized schemes do not interface directly with government bodies. They are by design voluntary industry programs. However, there has been a recent development in the Netherlands whereby the government is considering ways to use the private sector certification (known as Dutch HACCP) as part of an overall regulatory risk assessment. The Dutch Food and Consumer Product Safety Authority (VWA) is working with the Dutch HACCP program to identify ways in which an accredited third party certification can be recognized by the government as a tool in the assessment of risk. This is a model we would encourage FDA to evaluate more closely.

2. Do the current third party certification programs ensure compliance with FDA requirements?

The SQF food safety standard (which we call a Code) requires suppliers to meet all regulatory requirements in both the country in which the food is produced and the country(s) to which it is exported. As previously described, in addition to regulatory requirements, the Code requires that food safety best practices based on and/or aligned with HACCP, Codex Alimentarius, ISO 9000, the recommendations of the National Advisory Committee on Microbiological Criteria for Foods, risk assessment and food safety management systems be in place. The SQF program includes two Codes, one for manufacturing and the other for primary (on-farm) production. The Codes themselves are transparent documents developed through a stakeholder process. If a company can not meet regulatory requirements as a minimum, then they will not be eligible for certification.

We believe that FDA should develop a system for recognizing accredited third party certification programs. In the Interagency Working Group's Report to the President, it notes that "…the federal government can learn and benefit from the experience of the private sector." We believe that FDA should further examine the methodology used by the industry-led GFSI in establishing a government-led review and recognition program for food safety certification programs. Using this approach, the FDA is neither the accreditation body nor the certification body, but rather the authority which assesses private-sector certification programs against criteria set out by the FDA. This approach has several advantages over other proposals such as designating FDA as an accrediting body. For example, a recognition program would:

- Ensure a high degree of competence in the certifications
- Provide better assurance of compliance to federal regulations
- Require fewer FDA resources and be less expensive
- Allow for multiple certification programs to compete in the marketplace
- Level the playing field for those certification programs that wish to be FDA recognized
- Avoid conflict of interest
- Allow private-sector certification programs to remain voluntary

- Free up FDA resources to focus where they are most needed, including inspections, detection and enforcement actions
- Be available to other federal food safety agencies such as USDA/FSIS

Furthermore, FDA could easily make adjustments or modifications to certification programs by adding to or revising the criteria for recognition. Likewise, if a federal regulation or requirement were to change, the certification programs could quickly add this to the standard and provide assurances that such changes were implemented – something that would take federal agencies years to accomplish.

3. What are the obstacles to private sector participation in these third party certification programs?

Programs like SQF have taken auditing and certification to a new level. As more and more retailers and suppliers are made aware of this new approach, its acceptance and recognition is expanding worldwide. In Europe and other parts of the world, accredited certification for food safety has become the norm. In the U.S., and throughout North America, this approach is new and has been introduced at a slower pace than expected. It represents a culture change in the way audits were conducted and used in the past, and acceptance has been gradual. However, over the past year, there has been a significant swing in attitudes towards the recognition of accredited third party certification. Seven of the world's largest retailers announced that they will accept supplier certifications from any of the GFSI recognized programs, including SQF. In the past 8 months, over 1000 people have attended SQF System training courses.

For most suppliers, attaining SQF certification should not be a major hurdle. Companies already operating under the principles of HACCP and using a food safety management plan will find SQF requirements compatible. In some cases, companies may have to focus on their written plans and improve their methods of documentation. As previously described, SQF provides the option of three Levels of certification, thereby giving even small and low-risk operators the ability to achieve third-party certification. Perhaps the more relevant question should be, if a supplier is unable to achieve industry-driven third party certification from a program like SQF, are they providing safe food to U.S. consumers?

Accredited third party certification programs can be cost effective. SQF certified suppliers have attested that they have improved efficiencies by 20% by having better control over their operations. Because SQF requires suppliers to have support programs such as employee training and trace and recall procedures, suppliers have improved their performance and benefited economically. SQF certified suppliers have also found that they have a greater advantage in competing for customers in the global market because their food safety certification is internationally recognized and allows buyers to use their products with confidence. Some retailers consider SQF certified companies as their preferred suppliers.

One of the greatest cost savings to suppliers will be the acceptance of a recognized certification by many buyers around the world. The previous system of individually-tailored,

multiple, redundant audits was identified by suppliers as one of the most costly and unsustainable burdens placed on them by buyers. Providing mutual recognition of accredited certification programs will greatly reduce this burden while ensuring a better system of compliance assessment.

Another advantage to accredited third party certification programs is the ability to reach beyond country borders to develop partnerships and collaborations for enhancing food safety worldwide. For example, FMI and the SQF Institute recently announced a partnership with the German Retail Federation (HDE) and the French Wholesale and Retail Federation (FCD) to develop harmonization between the European International Food Standards (IFS) and the United States-based Safe Quality Food (SQF) program to strengthen food safety and quality certification standards. Working in cooperation with the Mexican government, the SQF Institute entered into a cooperative partnership with Mexico Calidad Suprema (MCS), a nonprofit association of food producers and packers in Mexico. MCS works to develop and strengthen agricultural competitiveness through information, education, training, certification, promotion and the use of the Mexico Supreme Quality Official Trademark. The Mexican trademark is a distinctive seal owned by the nation's government, which ensures the quality of Mexican products. The seal also certifies agricultural products meet official food safety standards to benefit producers, packers, distributors and consumers. The SQF program provides independent third-party certification that a supplier's food safety and quality management system conforms to international standards and U.S. food safety regulations.

4. What incentives would increase participation in these third-party certification programs?

We believe that FDA can and should provide incentives to those companies who have been certified by a recognized, accredited third-party certification program. Increased participation by the food industry in accredited third party certification programs that require compliance with federal regulatory requirements at a minimum will improve food safety overall. Therefore, as presented above, we support the recommendation to create incentives for foreign firms to participate in voluntary certification programs. Likewise, incentives should be made available to importers who purchase from certified firms. The federal government should establish these incentives, which could include expedited entry at ports, reduced compliance sampling and expedited processing of samples for laboratory testing.

Also, we suggest that FDA consult with other governments, in particular the Dutch Food and Consumer Product Safety Authority (VWA), to gain insight into how the government of the Netherlands plans to use accredited third party certification as a tool to assess risk.

However, the greatest incentive for accredited third party certification will be the impact it has on buyer and supplier relationships, enhancing food safety assurances and, ultimately, improving consumer confidence in the U.S. food supply.

****

We appreciate the opportunity to comment on this important issue. FMI members are committed to providing their customers with the safest food possible and finding more effective and efficient ways to achieve that goal is a priority for all retailers. As owners of the SQF program, an internationally-recognized accredited third party certification program, we feel we can make a significant contribution to FDA as the Agency further studies how best to use these types of programs. We look forward to continuing the dialog with FDA on this subject. Please feel free to call on us for additional information.

Sincerely,

Jill Hollingsworth

Jill Hollingsworth, DVM
Group Vice President
Food Safety Programs