



**BUREAU  
VERITAS**

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October 20, 2003

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03-034N-1  
Ken Holden

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Food Safety and Inspection service (FSIS)  
Docket Clerk  
U.S. Department of Agriculture  
FSIS  
Room 102  
Cotton Annex  
300 12<sup>th</sup> Street, S.W.  
Washington, DC 20250-3700

Reference Docket 03-034N

Dear Sir,

Please find enclosed our comments to be included in the CCFICS public meeting, which is to be held in Room 1 A001, Harvey W. Wiley Federal Building, 5100 Paint Branch Pkwy, College Park, MD on October 22, 2003.

If you have any questions, please feel free to contact me at your earliest convenience.

Best regards,

Ken Holden  
Vice President  
International Trade Division  
BIVAC N.A. (Bureau Veritas Group)  
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## **BIVAC N.A. (BUREAU VERITAS GROUP)**

### **PROPOSAL**

### **FOR**

### **FOOD TRACEABILITY AND SECURITY**

#### **PROPOSAL:**

In order to improve our food traceability and safety, it is critical to have more reliable information about the inbound cargo as far upstream as possible. This can be achieved today and we can improve trade flow without any significant costs to the trade entities. Importantly, we can do this at **no** cost to the US government.

We can no longer wait to see if it is necessary to take action. It is imperative that we acknowledge that it is almost certain that another catastrophic attack will occur again. We should also recognize that the food cargo flowing through our ports is one of our most obvious weak spots and our enemies certainly know it.

Bureau Veritas and other recognized international inspection companies have the immediate global capability to provide cargo inspection at ***point of origin*** around the world. Bureau Veritas (BV) already does this for many governments and has been doing it since 1828. Our system is not complicated nor is it expensive, yet it still provides an extremely high level of confidence of what cargo is actually in a container before it arrives.

To protect millions of lives and our nation's economy, we make the following proposal for immediate implementation:

To allow established international cargo inspection companies, such as BIVAC N.A. (Bureau Veritas Group), to perform inspections at ***point of origin*** and forward this information in an acceptable electronic format to the designated U.S. government agency.



We only need to receive the USDA and/or the FDA accreditation. Then our inspected shipments could be considered as "Low Risk" and be eligible for fast clearance on arrival.

If we receive the CBP's recognition/accreditation, our government will immediately realize the following benefits from our proposal:

1. Can be implemented immediately with our current programs.
2. Provides cargo information by an internationally recognized inspection, testing and certification company.
3. Reduces the risks of a Weapon of Mass Destruction "WMD" arriving at our shores.
4. Allows Customs to utilize their resources in higher risk areas.
5. Increases the percentage of containers physically inspected.
6. Allows the "Risk Profiling" of products or geographical areas for specific action.
7. It facilitates legitimate trade.
8. Incorporates a "Shared Cost" approach.
9. Reduces BCP's annual costs for cargo clearance processing.
10. Can utilize current and advanced technology for container movement, security and electronic seals.
11. Enhances protection to exporting ports by verifying shipments outside sensitive or vulnerable areas.
12. It eliminates the need for BCP to negotiate agreements with uncooperative or hostile foreign governments.
13. It enhances our "Layered Defense" plan.

In conclusion, it is obvious to everyone that it is absolutely necessary to immediately implement some form or process that will improve our nation's food supply and security. We can do this by "Pushing Back the USA Borders", but we can't wait until after the next attack. Since BCP does not have the manpower or the resources, the most logical way to help reduce these risks is to allow accreditation for international inspection agencies. Our inspected shipments at **point of origin** ("Low Risk") would then be eligible for fast clearance or any other action BCP deems necessary.

These are dangerous times and our exposure grows with each passing day. We know there is a substantial risk with cargo arriving in containers and we have a responsibility to take logical steps to reduce this risk of terrorism. We can and must take these steps now to help save lives and protect our national economy.



Please contact me with any questions or comments. Also, feel free to contact our President and CEO, Mr. Jon Caffin at telephone number (305) 593-7878, fax: (305) 593-1783 and e-mail: [jean-michel.caffin@us.bureauveritas.com](mailto:jean-michel.caffin@us.bureauveritas.com).

Best regards,

A handwritten signature in black ink that reads "Ken Holden".

Ken Holden  
Vice President  
International Trade Division  
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## **EVALUATION CRITERIA**

### **1. Technical Merit:**

- A. Bureau Veritas already has the system in place. Many governments now require pre-departure verification at country of origin – no matter where. Almost all of them require 100% supervision of the cargo loading and the use of our numbered BV seal on the container after completion of loading.
- B. Our system is effective, flexible and scalable, which can also be used for shipments within the U.S.A.
- C. It allows the immediate implementation with current technology for container seals. New electronic seals can also be applied once they are approved by US Customs.

### **2. Time Scale for Developing and Implementation:**

- A. Our system can be implemented immediately. It has been operational and proven effective for many years around the world.
- B. We only need US Customs to create the “Green Lane” for shipments that have performed a BV Pre-Departure Verification.
- C. It allows the implementation of advanced technology for internal container security devices and global tracking equipment whenever they are technically ready and approved.

### **3. Cost for Completing Development and Implementation:**

- A. The cost of the BV Pre-Shipment Inspection is paid by our client, which can be US Customs, the USA importer or the foreign exporter.
- B. This proposal has a “Shared Cost” benefit to the US government, as well as to the exporter or importer for faster clearance through US Customs.

### **4. Technical Background and Institutional Resources Available to Perform the Project:**

Bureau Veritas was established in 1828 as an inspection, testing and certification company. We have 16,000+ experts working from more than 600 offices in about 140 countries. We have major activities in International Trade, Government Contracts, Marine, Aviation & Aerospace, Energy & Process, Construction and Certifications.

The Bureau Veritas Group is trusted by numerous governments and administration and have been authorised to act on their behalf around the globe:

- **125** Flag states have delegated powers to BV Marine Division



- **24** Governments use the services of AeroSpace Division for aircraft and airfield safety, including a joint venture with the French Government (GASAC).
- Over **80** French official authorisations and approvals are held by BV France alone.
- Bureau Veritas Group companies are also accredited for certification, inspection and testing in more than **20** countries, including Hong Kong, Singapore, Korea, China, France, Britain, and the United States.
- BVQI, the Bureau Veritas dedicated certification subsidiary, is accredited in **25** countries.
- Bureau Veritas holds more than **26** notifications under the terms of EU Directives on product regulation.
- Bureau Veritas also enjoys the trust and confidence of International Banks, which often require our certificates for confirmation of legitimate trade.
- BV Group turnover in 2001 exceeded USD \$1 Billion and the Group has experienced continual and profitable growth over the last several years. More information is available on the web site: [www.bureauveritas.com](http://www.bureauveritas.com)
- Bureau Veritas has a global data transmission and communication network (VPN) that uses AS400 in the global regions as the backbone and micro computers at the office level.
- Additionally, BV has a wholly owned network of laboratories around the world that is certified to conduct many different types of tests on a wide variety of products.
- We can also provide second and third party auditing services to international standards, industry initiatives and customized customer requirements including ISO 9000, ISO 14001, QS-9000, TS16949, TE Supplement to QS-9000, AS9000, AS9100, SA8000, Code of Conduct, TL9000, Food Safety, HACCP, SFI, OHSAS18001, Guide 25, supply chain audits and Security Management.