



Harmonization of Food Safety Regulation:

A Comparison Among U.S.A., EU and China

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As far as food safety regulation is concerned, long term efforts have been made both inside and outside nations to its harmonization in the term of food standards, food control system, food legislation, regulatory approaches and so forth. Against this context, this paper will look into the issue of harmonization of food safety regulation by addressing four questions as follows:

- (1) **Why** to harmonize food safety regulation?
- (2) **Who** to harmonize food safety regulation?
- (3) **What** to harmonize food safety regulation?
- (3) **How** to harmonize food safety regulation?

First of all, as the answer to the first question, there are three aspects will be addressed. First, facing with emerging risks in the changing food environment, such as the risks concerning on consuming genetically modified food, or resulting from chemical hazards in the food chain, it is necessary to harmonize food safety regulation by joint efforts both at national and international level. Second, compared to the food regulation on the consideration for economic development, it is the priority to regulation food for the public health since the importance in this point has been justified by the lessons from food safety issues like bovine spongiform encephalopathy (BSE) crisis in the Europe. Third, in addition to the efforts made by international organizations such as Food and Agriculture Organization and World Health Organization, the national efforts on harmonization of food safety regulation have been also taken place in which the examples of U.S.A., EU and China will be introduced and analyzed.

Secondly, as far as food safety regulation is concerned, everyone is the stakeholder no matter what role she/he is. In this point, four major roles will be emphasized and there are consumer, food operator, government and scientist. However, the so called “Organized irresponsibility” by [Ulrich Beck](#) has account for the difficulty for locating responsibilities among the stakeholders. In this sense, the point hereinafter is to application of risk analysis as a way to ensure the responsibility since it clarifies the functions among the different stakeholders by its well structured process, including risk assessment, risk management and risk communication. Furthermore, either for assurance food hygiene or safety related quality, Hazard Analysis and Critical Control Point has been regarded as an effective way for food operator to assume its primary responsibility for food safety.

Thirdly, as the key issue in this paper, the tough but important question in this paper is to figure out what to harmonization, that is to say, what food safety is. The definition of food safety is deduced from its relationship with food security, food hygiene, food quality, food nutrition and food sustainability. As elaborated in the paper later, food safety is a combination of values which can be understood from two dimensions. First, as a combination of values for safety at horizontal level, it contains minimal requirements in the food hygiene, food quality, food nutrition and food sustainability. And as a combination of values at vertical levels, it contains added values from food hygiene, food quality, food nutrition and food sustainability. Correspondingly, for the former, the acceptable level for food safety, in other words, the bottle line for food safety, can be harmonized all over the world. Contrarily, for the latter, when added values involving, the acceptable level for food safety varies from country to country, depending on the legal requirements, social developments and risk perceptions, *etc.*

Fourthly, based on the analysis in the third part, how to harmonize is concerned from the perspective that considering food safety as a combination of values for safety. With this precondition, the considerations in this regard are threefold. First, it is the emphasis of philosophy in food safety regulation that regulation justifies safety. That is to say, the sources for food and substances added into food can only been regard as safe as long as there is relevant legal prescription. Second, as the rules for regulation, rule of default, rule of prohibition and rule of authority can be realized in the ways of generally recognized as safe (GRAS), the prescription on the food law for forbidding unsafe food accessing into market, and the premarket approval for food added substances respectively. Third, given the practices in the way of harmonization, several approaches will be suggested for the harmonization of food safety regulation both from the perspective of value for safety and added value in the term of food hygiene, food quality and food nutrition.
