

5231 '99 SEP 23 19:34

September 20, 1999

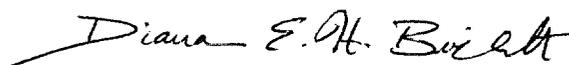
NSDA/FSIS Hearing Clerk  
Docket No. 98-045N  
300 12th Street, SW  
Cotton Annex, Rm. 102  
Washington, D.C. 20250-3700

FDA/Dockets Management Branch (HFA-305)  
Docket No. 97N-0074  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

To whom it may concern:

The enclosed letter was sent today, September 20, to Secretaries Glickman and Shalala and also to Director Lane, regarding Dockets No. 98-045N and 97N-0074. The comments are supported and signed by members of the Safe Food Coalition. Please note for the record that these comments have been submitted. Thank you.

Sincerely,

  
Diana Birkett

97N-0074

C107

5232 '99 SEP 23 A9:34

September 20, 1999

The Honorable Dan Glickman  
Secretary of Agriculture  
U.S. Department of Agriculture  
14th Street and Independence Ave, S.W., Rm. 200 A  
Washington, D.C. 20250

The Honorable Donna E. Shalala  
Secretary of Health and Human Services  
200 Independence Ave, S.W., Rm. 615 HHH  
Washington, D.C. 20201

The Honorable Neil Lane  
Director, Office of Science and Technology Policy  
Old Executive Office Building, Rm. 424  
17th Street & Pennsylvania Ave, N.W.  
Washington, D.C. 20502

Dear Secretary Glickman, Secretary Shalala and Director Lane:

On behalf of the Safe Food Coalition, we are writing to express our objections to the meeting format that has been adopted by the President's Council on Food Safety. The Safe Food Coalition includes consumer advocacy, labor, whistle-blower and victim support organizations that have a longstanding interest in improving the safety of the food supply. The following members of the Safe Food Coalition support this letter: Center for Science in the Public Interest, Consumer Federation of America, American Public Health Association, National Consumers League, Government Accountability Project, S.T.O.P. -- Safe Tables Our Priority, United Food and Commercial Workers International Union, and Consumers Union (not an official member of the coalition but joins in support of this letter).

Although our groups have only limited staff and resources, we have been active participants in public meetings on food safety for years, including many meetings held by the Department of Agriculture to solicit public comment on the design of the HACCP program. We appreciate the transparency which the public meeting brings to government decision-making and the opportunity to make our views known in a public meeting setting.



We are especially enthusiastic about the model followed by the USDA in recent years. The "open roundtable" format benefits all the parties:

- Members of the public and their representatives can speak directly to the government decision-makers to express concerns about or support for specific aspects of government proposals. This has been especially important because high officials of the Department, including the Secretary, have taken the time and expressed their interest in the details of the issues by attending and actively participating in the give-and-take of the discussions.
- Consumer representatives can hear the views and positions of industry representatives, scientists, new technology providers and others attending the meetings. This information has been invaluable in informing our positions.
- The meetings have generally been held "on the record," so that the views expressed by the participants have the same impact as regulatory comments submitted to the agencies.
- In addition, we have heard from government officials that the interchanges between consumer representatives and the industry have been beneficial to the agency in formulating policy.

The format adopted by the President's Food Safety Council differs significantly and is, from our point of view, much less useful.

- Key decision-makers come to the meetings, make their remarks, and remain only until their government colleagues have been heard. They do not hear from the public. Since these meetings are being held to take action on a Presidential Initiative, this is especially unfortunate. It gives the impression that policymakers do not have an active interest or direct involvement in the President's Food Safety Initiative.
- There is virtually no opportunity for on-going dialogue with key decision-makers. Nor do they hear the exchanges between other participants.
- Discussion is limited to small groups. This means consumer and industry representatives miss important information that is shared in other groups.
- The discussion is not transcribed for the record. Instead, notes are taken by government note-takers. Consequently, the President's policymakers receive only information that has been strained through the sieve of staff perceptions.

- Government officials report on the discussions at each table.

The Food Safety Council model severely mutes the voice of consumer representatives. We strongly urge the agencies to adopt the "open roundtable model" for future public meetings of the President's Food Safety Council.

USDA and FDA representatives cited in their testimony to the U.S Senate on August 4 that this Council is the important unifying force in food policy decision-making. If this is in fact the case, we further suggest that the Council's decision-making process warrants more active participation by the chief executives of the departments and the leaders of the agencies.

Sincerely,

*Carol Tucker Foreman (DEKB)*

Carol Tucker Foreman  
Consumer Federation of America

*Caroline Smith DeWaal*

Caroline Smith DeWaal  
Center for Science in the Public Interest

**On behalf of the following members of the Safe Food Coalition:**

**American Public Health Association**

**National Consumers League**

**Government Accountability Project**

**S.T.O.P. -- Safe Tables Our Priority**

**Consumers Union**

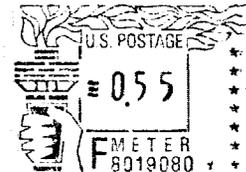
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but joins in support of this letter)

**United Food and Commercial Workers  
International Union**

**CSPI** Center for  
Science in the  
Public  
Interest

nonprofit  
publisher of

***Nutrition Action Healthletter***  
1875 Connecticut Avenue, N.W., Suite 300  
Washington, D.C. 20009-5728



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Docket No. 97N-0074  
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