

2433 South Grand Avenue
Los Angeles, CA 90007
tel 213.763.2520 Ext. 227
fax 213.763.2729
www.fibr.com

February 8, 2000

9182 '00 FEB 15 A9:48

President's Council on Food Safety
C/o FDA Dockets Management Branch (HFA-305)
5630 Fishers Lane
Room 1061
Rockville, MD 20852
Docket Number: 97N-0074

Dear Council Members:

Thank you for the opportunity to provide comments on the Food Safety Strategic Plan that is being developed as part of the President's Initiative on Food Safety.

The Food Industry Business Roundtable (FIBR) is a non-profit trade association created to promote and sustain the growth and viability of the ethnic-specialty food processing industry in the Southern California region. We believe that by sharing information, knowledge and resources, we can build partnerships and relationships that will benefit the entire food processing industry. FIBR has nearly sixty association members and reaches an audience of over 700 Southern California food processors through our business seminars, mixers and association newsletter. The majority of FIBR's members are small-to medium-sized food processors, while other members include suppliers, retail, local and state regulators, and academia.

President
J. Mark Roth
EL BURRITO MEXICAN FOOD PRODUCTS, INC

Vice President
Gina Harpur
JUANITA'S FOODS

Vice President
Kenny Yee
WING HING NOODLE CO.

Secretary
Don Whittemore
DANDY DON'S HOMEMADE ICE CREAM

Treasurer
Shelly Suzuki
SUZUKI ENTERPRISES

Ozabe Banks
MONEY SAVER'S MEATS

Henry C. Leong
QUON YICK NOODLE CO.

Gilbert Medina
PEPPER'S UNLIMITED

Stephen Summers
TOP NOTCH FOODS, INC.

Fred Francia
SOUTHERN CALIFORNIA EDISON/ADVISOR

Linda Yeung
CO-FOUNDER/ADVISOR

In FIBR's three young years, we have worked hard to provide information that not only helps businesses stay competitive, but also works to ensure safe, quality products in our region. To that end, FIBR is very interested in providing constructive input as the Council finalizes its strategic plan.

Although FIBR does not have the staff or resources to provide in-depth analysis of the proposed plan, there are some basic themes we think are critical to successful implementation:

Education and Training: Industry has a great interest in providing safe, quality products -- it just makes good business sense. Unsafe food product put the company's reputation, customers and sales at stake. For small and medium-sized food processors, resources for educating and training their workforce can be an issue. A well informed workforce, educated in general food safety, good manufacturing practices and HACCP (where applicable) can help ensure safe food products for consumers. Resources allocated to provide or at least supplement training costs will help industry provide the safest environment possible.

97N-0074

C229

President's Council on Food Safety
February 8, 2000
Page 2

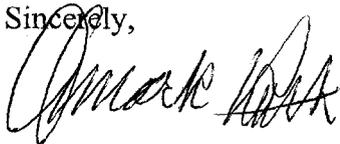
Science and Risk-based Assessment: Industry understands that inspection and enforcement are necessary. However in-plant inspections and testing are labor-intensive and costly to business and government. Science and risk-based assessments are a good idea as long as they are based on factual statistics that are well proven and accurate. Such methods will help to streamline inspections and enforcement of industry by prioritizing real or potential hazards and directing the scarce resources of state and local officials where they are needed most.

Unified, Standardized Policies: Recognizing that all health agencies, local, state and federal have an important role to play in food safety, FIBR supports a unified food safety policy that would standardize methods of assessment, inspection and enforcement. Industry is challenged when working to comply with a multitude of regulators, whom each have their own unique systems and approaches to food safety. Although we recognize complete standardization among such a diverse group of agencies would not be easy, some basic overarching policies regarding methods of assessment, inspection and enforcement would make the job of compliance an easier one for industry to achieve.

Final Recommendation: FIBR would like recommend that the Council take necessary action to ensure that the hard work expended in this process by government, industry, academia and consumers will not be lost with a change in administrations. With elections just a heart-beat away, a mechanism should be put in place that ensures that the work of the Council will continue past the planning stages and that successful implementation will take place.

The Food Industry Business Roundtable thanks your for the opportunity to comment on the Food Safety Strategic Plan being developed by the Council. Although FIBR has little in resources to offer to this process, we do have the knowledge and expertise of our members and we look forward to continuing to participate in this process.

Sincerely,



J. Mark Roth
President
El Burrito Mexican Food Products
FIBR President



Henry Leong
President
Quon Yick Noodle Company
FIBR Legislative Committee Chair

FLAT RATE REGARDLESS OF WEIGHT ONLY

FEB 10 00 CA 15.75 U.S. POSTAGE 8193614

CALL 1-800-222-1811

PRIORITY MAIL

ORIGIN (POSTAL USE ONLY)

PO ZIP Code 10002	Day of Delivery <input type="checkbox"/> Next <input type="checkbox"/> Second <input type="checkbox"/>	Flat Rate Envelope <input type="checkbox"/>
Date In Mo. Day Year	<input type="checkbox"/> 12 Noon <input checked="" type="checkbox"/> 3 PM	Postage \$
Time In <input type="checkbox"/> AM <input type="checkbox"/> PM	Military <input type="checkbox"/> 2nd Day <input type="checkbox"/> 3rd Day	Return Receipt Fee 21
Weight lbs. ozs.	Int'l Alpha Country Code	GOD Fee Insurance Fee
No Delivery <input type="checkbox"/> Weekend <input type="checkbox"/> Holiday	Acceptance Clerk Initials	Total Postage & Fees \$

DELIVERY (POSTAL USE ONLY)

Delivery Attempt 2-12-00	Time 5:50 AM	Employee Signature ZDL
Delivery Attempt	Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature
Delivery Date 2-14-00	Time 10:30 AM	Employee Signature
Signature of Addressee or Agent Bach		
Name - Please Print X		

CUSTOMER USE ONLY
TO FILE A CLAIM FOR DAMAGE OR LOSS OF CONTENTS, YOU MUST PRESENT THE ARTICLE, CONTAINER, AND PACKAGING TO THE USPS FOR INSPECTION.

WAIVER OF SIGNATURE (Domestic Only) Additional merchandise insurance is void if waiver of signature is requested. I wish delivery to be made without obtaining signature of addressee or addressee's agent (if delivery employee judges that article can be left in secure location) and I authorize that delivery employee's signature constitutes valid proof of delivery.

NO DELIVERY Weekend Holiday _____ Customer Signature

FROM: (PLEASE PRINT) PHONE ()

Mark Roth
 Food Industry Business Roundtable
 2433 South Grand Avenue
 Los Angeles, CA 90007

TO: (PLEASE PRINT) PHONE ()

President's Council on Food Safety
 c/o FDA Dockets Management Branch
 (HFA-305)
 5635 Fishers Lane, Room 1081
 Rockville, MD 20852
 Docket Number: 97H-0074

FOR PICKUP OR TRACKING CALL 1-800-222-1811 www.usps.gov



Addressee Copy