



State of Wisconsin
Tommy G. Thompson, Governor

Department of Agriculture, Trade and Consumer Protection
Ben Brancel, Secretary

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5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket No. 97N-0074

We appreciate this opportunity to comment on the President's Food Safety Council's "Draft Preliminary Food Safety Strategic Plan." Our comments are divided into two groups. The first group of comments primarily addresses broader systematic and conceptual issues that we believe should be important components of the plan. The second group of comments primarily suggests changes and additions to the draft plan.

Coordination and Integration

For the food safety system to truly be risk-focused priorities must be established and resources must be distributed across existing food safety systems rather than simply within each system. For resources to be used most efficiently and effectively, routine operations as well as projects designed to improve the current food safety system must be coordinated, and whenever possible, integrated.

We believe that the draft document does not adequately articulate the need and importance of developing systems that are integrated and coordinated. The issue of integration and coordination of systems a key issue that need to be acknowledged and improved. The need for greater coordination and integration of effort and resources is a critical issue within the federal system and with partnering state and local agencies, the food industry, and academia. Many of the proposed improvements to our nation's food safety system described in the draft plan are right on target. However, in many cases, if an improvement is made by one agency, or by one part of an agency, without integration or coordination with other units that have similar or linking responsibilities, the value of the improvement is greatly decreased or lost altogether.

National Food Safety System

As currently drafted, the plan acknowledges the need for cooperation and coordination with state and local food safety agencies. However, the concept of a national food safety system needs to be expanded and explained in greater detail. We believe that the strategic plan should propose improvements necessary to build a more fully integrated and effectively coordinated national food safety system.

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As a first step, we believe a national food safety system should be designed and operated to make the best use of the collective resources currently available at all levels of government. Once we have done the best with what we currently have we should work in a coordinated way to secure and appropriately distribute the capacity, expertise and funding resources necessary to fill in the gaps.

To convert the nation's current food safety system into an integrated, coordinated, truly national system would require several changes. Changes in work relationships and philosophies would be as important as changes in work systems and statutory authority. Credibility and clear expectations will be essential components of an integrated system. A national food safety system would rely on delivery of equivalent inspection services regardless of the agency actually delivering service. To assure equivalency, credibility, and a reasonable level of uniformity we believe that key components of this system would be clear, mutually agreed upon capacity and performance standards and a sound, performance-driven evaluation system.

Work already in-progress by the National Food Safety System project can serve as a resource for identifying and defining many needed process and system improvements. This project can also be the vehicle for field testing components that require integration or coordination with state or local food safety agencies.

Specific Comments

On page 3 under the summary for the "Risk Management Goal, we are not clear about who the target audience is for the proposed improvement. For example:

Objective 2 – "Promote development and implementation of preventive techniques and controls using risk-based approaches and establishment of national standards, including performance standards." Performance standards for whom?

Objective 5 – "Protect the food supply through consistent training and consistent enforcement of food safety laws and established regulatory requirements." Training for whom? Industry? Regulators? Both?

On page 3, under the "Risk Communication Goal" summary.

Objective 2 – Reword the sentence to begin: "Develop state-of-the-art science-based, integrated education and training systems"

On page 4, under the heading "Food Safety: The Nation's Challenge:"

Reword the fourth sentence, "More consumers demand these foods year round, making safety issues surrounding production, transportation, refrigeration, and international trade increasingly important."

On page 8, under the heading Science and Risk Assessment

Reword the final sentence of this section to read, "This research agenda must be flexible, coordinated, and comprehensive to meet"

On page 9, under the "Science and Risk Assessment Goal" section

In the second action item under Objective 1, reword the sentence, "Develop, implement, integrate and update priority risk assessments...."

Under Objective 2, add an action item "Develop state-of-the-art information systems to improve ease, accuracy, and completeness in gathering and distributing information."

Under Objective 3,

Reword the first sentence of the second action item, "Use risk analysis to identify gaps in knowledge or science and establish priorities....."

Reword the final sentence of the second action item, "The scope of the unified program should include:.....drug and biologic residues, and veterinary drug and biologic residues associated with animals that are sources of human food."
(The original sentence here is unclear. We suggest using dot points to make it readable, but----- that's a style and grace thing.)

Under objective 6 (page 10)

Reword the first sentence of the first action item, "Develop a system that uses surveillance and monitoring data about risk associated with the composition of specific food products, food processes, and food handling as indicators of potential food safety problems."

On page 11, under the "Risk Management" summary section:

Add a sentence at the end of the section, "This information will be used to adjust strategies, priorities, and resources to fill identified gaps in managing food-related risk."

On page 12, under the "Risk Management Goal" section;

In Objective 3,

Reword the first sentence of the second action item, "Upgrade the ability at all levels to conduct public health surveillance and evaluation of foodborne illnesses....."

Reword the first sentence of the third action item, “Expand the capacity and increase the expertise of public health laboratories.....

Add a sentence to the fourth action item, “Results of these special surveillance efforts should be analyzed and integrated with other data to provide context and completeness.”

Reword the first sentence of the sixth action item, “Upgrade food laboratory standards and build complementary infrastructures at federal, state,.....”

Under Objective 4,

Add a sentence to the first action item; “Further refine prioritization of inspection work using operator performance criteria.”

Reword the second sentence of the third action item, “This approach also Would help to ensure a level playing field.....

Reword the first sentence of the fourth action item, “Develop an analytic framework that provides step-by-step guidance for risk-based inspections at all levels;.....” (The current version uses a \$10 word, “algorithms”, when simpler words would get the job done.)

Under Objective 5,

Reword and restructure the first sentence of the first action item to be two sentences (page 13), “Maintain and augment, where necessary, trained and enforcement and compliance officers. Use these specialized staff in situations that cross inspection jurisdictions or in situations that rely heavily on investigatory skills such as interviewing or auditing.”

Reword the second sentence of the third action item (page 13), “Target compliance inspections toward facilities at critical control points in the farm-to-table chain that have a history of non-compliance.”

Under Objective 6,

A question about the fourth action item (page 14), “What would be the pivotal basis for incentive systems? How about using performance?”

Under Objective 7,

Reword the first sentence of the first action item, “Expedite pesticide licensing....”

Add an action item, “Develop a system to evaluate and record decisions and rationale about the food safety aspects of proposed food production, processing of delivery innovations.”

Under Objective 8,

Reword the second sentence of the third action item, “Develop national protocols for initiating.....adequate communication between partnering agencies, with industry and the public during recalls.”

Under Objective 9,

Reword the Objective itself, “Develop an improved system of assuring that foods being exported to the U.S. are produced under a food safety system that achieves a level of science-based protection that is specified by the U.S.

Reword the first sentence of the first action item, “Strengthen assessments of foreign food safety systems.....”

Under Objective 10,

Substitute for the first action item (page 15), “Develop a system to continually monitor and routinely evaluate the effectiveness, value, and efficiency of food safety risk management systems using critical indicators. Use data to identify emerging food safety/food-related public health problems or gaps in risk management services. Adjust strategies, priorities, and resources as warranted to make corrections or improvements to the risk management system.”

On page 16, in the summary for the “Risk Communication” section:

Reword the final sentence in the second paragraph, “As research and experience reveal new information.....and transmission of foodborne hazards and preventive approaches to eliminate or minimize food-related hazards, food safety agencies.....”

On page 16, under the “Risk Communication Goal” section:

Under Objective 2,

Reword the first action item, “Develop messages with a consistent, focused content and a coordinated delivery system. Provide variety in style, format, media, level of detail and sophistication as needed to effectively deliver the message to a range of target audiences.”

Under Objective 4,

Reword the first action item, "Develop and implement a system to evaluate the effectiveness of information campaigns....." (Consider including examples of potential evaluation criteria, - ala the second action item.)

On pages 17-22, under the "Organizational Considerations" sections—I have no comments at this time. I'm in listening and digesting mode. I'm also neither stupid nor crazy--- most days.

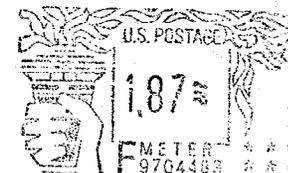
Again, we thank the President's Council on Food Safety for this opportunity to provide comments on the Draft Food Safety Strategic Plan.

Sincerely,



Steven B. Steinhoff
Administrator
Division of Food Safety
Wisconsin Department of Agriculture,
Trade and Consumer Protection

WI DEPT OF AGRICULTURE
TRADE & CONSUMER PROT
DIV OF FOOD SAFETY
P.O. BOX 8911
MADISON WI 53708



FDA DOCKETS MANAGEMENT BRANCH
(HFA-305)
5630 FISHERS LAND RM 1061
ROCKVILLE MD 20852