

DEPARTMENT OF AGRICULTURE
Food Safety and Inspection Service
[Docket No. 98-045N]

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Disease Control and Prevention
Food and Drug Administration
[Docket No. 97N-0074]

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ENVIRONMENTAL PROTECTION AGENCY
[Docket No. OPP-00550; FRL-6019-9]

PRESIDENT'S FOOD SAFETY INITIATIVE

Comments by Joseph Corby, President
Association of Food and Drug Officials

My sincere thanks to all of you for allowing the Association of Food and Drug Officials (AFDO) to provide comments at this very important meeting.

I do not believe any other professional organization has pursued the development of a national food safety system through the integration of government resources at all levels as aggressively as AFDO has recently. Fully integrating all available food safety resources is our view on what a comprehensive food safety system should be in this country. AFDO's vision for this plan has been published in national publications, submitted to many professional organizations for comment, and delivered at numerous seminars, meetings and conferences. We have concluded that this plan must be a good idea for everywhere we go someone is claiming that the concept was his or her idea originally. This is not about taking credit, however, it is about accomplishing something very significant for food safety in this country.

Fully integrating available food safety resources has become AFDO's "Call to Action." In a sense, it is equivalent to declaring war on foodborne illness and deploying the armies of state and local health and agriculture professionals alongside their federal counterparts in a national struggle. Imagine if you can the enormous human and information resources that could be employed to produce a comprehensive food safety system. We do not need to start over -- we need to join forces and act together in a fully integrated and coordinated manner.

I have included with my written comments AFDO's vision statement for integrating the food safety system along with simplified schematic drawings and a list of what we believe would be major roles to be performed by federal, state, and local government agencies. We continue to update this material as we dialogue with all the major stakeholders in the food safety arena.

Clearly, now is the time to begin the planning for a national food safety system and I congratulate all of you for your wisdom in conducting this meeting. AFDO offers the following recommendations for achieving our objective of a fully integrated national food safety system:

1. **Continue Dialogue with State and Local Government**

The recently held fifty state meeting in Kansas City for state program managers was a resounding success and demonstrated, in our view, a willingness by the states to pursue a fully integrated system. Perhaps a select group from the participants of

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1. **Continue Dialogue with State and Local Government** (continued)

this meeting could help to collate the results and make more recommendations, including the identification of additional stakeholders. We need to have additional fifty state meetings for the purpose of updating participants and receiving further input. There must be active involvement of state and local government during the development stages of this process. The federal government must not try to accomplish it on their own.

2. **Assemble a Steering Work Group**

This work group should consist of all major stakeholders from industry, government at all levels, academia, and consumer groups. Their function should be to direct working groups or committees to work on necessary tasks required for building the system.

3. **Conduct a Resource Assessment**

AFDO and the National Association of City and County Health Officials (NACCHO) are already discussing a possible plan for surveying state and local government agencies for the purpose of determining available food safety resources. This is no small task to accomplish but we need to know exactly what resources are currently available if we hope to integrate them into a comprehensive system.

4. **Promote the Concept of a Fully Integrated System**

To properly promote the concept we need to locate ambassadors to speak at conferences and meetings for the purpose of expanding the vision.

5. **Address the Skeptics Head-on**

Consider assembling a working group to identify potential barriers and obstacles after which these areas should be promptly addressed and the issues resolved.

6. **Pilot Testing in FY2000**

We should set a goal that this plan will be ready for pilot testing before the turn of the century, perhaps in several states and local jurisdictions within the country.

As our most vulnerable people continue to become ill on foods which never before caused us harm we are presented with this great opportunity. We have talked, we have studied and we have even witnessed some truly successful programs evolve from federal-state partnerships, cooperative programs, and cooperative agreements. All of us must now begin to act and think in a unified national frame of mind. AFDO believes that fully integrating the food safety system is the appropriate direction to take.

Thank you very much.

INTEGRATING THE FOOD SAFETY SYSTEM

AN AFDO VISION

Today's food safety regulatory structure is a system that consists of multiple government oversight of the food industry and the foods they produce, distribute, and sell. This system, with an infrastructure that includes federal, state, and local government as participants, has served the public extremely well and we proudly boast to have the safest food supply in the world. While the U.S. Food and Drug Administration (FDA) and U.S. Department of Agriculture (USDA) are viewed as the major food safety regulatory agencies in the United States, it is state and local government programs that conduct more than 80% of the food establishment inspections, investigate the majority of foodborne illnesses, and sample the majority of food products for bacteriological or chemical defects. This is an enormous task and responsibility.

To ensure the public of a safe, wholesome, and properly represented food supply, an effective food safety system must be a combined effort of the food industry, the government (at all levels) and the consumer. Surveillance, research, risk assessment, effective regulations with science-based regulatory standards, appropriate inspection, enforcement and compliance activities, training and education must be the cornerstones of any future food safety system. If there is a system breakdown resulting in foodborne illness, the industry must have the willingness and government must have the flexibility and the capacity to move swiftly to determine the cause of the illness, remove the implicated product from the marketplace, and build in strategies to prevent future recurrences.

Does such a system need to be invented? No, this system is already in place today. *Is the system perfect?* No, but over the years it has continually improved and it has allowed the development of one of, if not, the safest, most abundant, most diverse, and most convenient food supply.

Can our current food safety system be improved? Absolutely, but the Association of Food and Drug Officials (AFDO) believes that we do not need to start over from ground zero -- we need to determine more effective ways to enhance the synergism of and to strengthen the effectiveness of the federal, state, and local infrastructure currently in place.

When President Clinton announced the Food Safety Initiative to this country much was said about the role of the federal government to assure the consuming public safe and wholesome food. Originally there was little said about state and local food safety efforts despite the mammoth amount of work that has been done there, and the availability of abundant resources. As a result, AFDO decided to mobilize with their affiliates and state partners and proclaim that no real debate about a national food safety system could exist without including state and local jurisdictions. AFDO has spoken at conferences, seminars, and training workshops where they remind everyone about the enormous resources available in state and local programs. Recently a vision by AFDO was developed detailing their views as to what a national food safety system could and should be. AFDO is aggressively promoting and articulating this vision and the impact we believe it can have on improvement to and resource maximization for food safety in this country.

Within this food safety system we envision the federal government providing leadership through surveillance, technical support, setting of standards, risk assessment, evaluation of programs, certification of field personnel, training, and additional funding where needed. We believe the role of the states and local governments would be to perform domestic inspections, investigations, and collections of samples. Furthermore, we believe it is the responsibility of the federal government to provide the proper regulatory oversight of imported foods at entry point levels. By allowing states and local government agencies to handle domestic food safety affairs the federal government can increase its oversight of imported food, which, in our view, is desperately needed. State and local governments should also continue their licensing programs and strong enforcement activities as they see fit. Our vision is one of coordination and uniformity resulting in the elimination of duplicative efforts and better utilization of all current dedicated food safety resources.

An **integrated** system is a vision of joining these resources into a unified organization. It would include centralizing current and available knowledge relative to food safety such as specific information on animal health, foodborne illness, food establishment inspections, and sample analysis. AFDO also believes an integrated system would include tracking mechanisms for foodborne illness and food defects, which can be monitored by all states and local jurisdictions electronically.

To AFDO, whether the food safety system is implemented by an independent single agency or by multiple agencies is not the key to improving our overall system. What is vitally important, however, is the need to take a new look at our food safety system and to fundamentally change from our current concept of a "federal system" and a "state/local system" to a fully integrated "national system." As a prerequisite to accomplishing this task, the roles and responsibilities of each federal agency involved with various aspects of food safety, as well as the roles and responsibilities at the state and local levels must be explicitly defined. Once these roles are clear at the federal level, the roles of the counterparts at the state and local levels will fall into place over time.

AFDO believes this is a daring and comprehensive plan and we shall solicit input from all potential players in this strategy, including government, industry, and academia. We are currently working very closely with FDA to better develop and clarify the concept of this plan.

AFDO concurs with the National Academy of Sciences' "Committee to Ensure Safe Food from Production to Consumption" where they recommend in their 1998 report that:

"The National Food Safety Plan should:

- include a unified, science-based food safety mission;
- integrate federal, state, and local food safety activities;
- allocate funding for food safety in accordance with science-based assessments of risk and potential benefit;
- provide adequate and identifiable support for research and surveillance to:
 - monitor changes in risk or potential hazards brought on by changes in the food supply or consumption patterns; and
 - improve the capability to predict and avoid new hazards;

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- increase monitoring and surveillance efforts to improve knowledge of the incidence, seriousness, and cause-effect relationships of foodborne disease and related hazards;
 - address the additional and distinctive efforts required to ensure the safety of imported foods;
 - recognize and provide support for the burdens imposed on state and local authorities that have primary front-line responsibility for the regulation of food service establishments; and
 - address consumers' behavior related to safe food handling practices."

The dwindling resources available for government services mandate that government at all levels develop effective ways to work smarter and more cooperatively in the regulation of food. The states and federal agencies have a long history of working together through various cooperative agreements, contracts, grants, memoranda of understanding and, most recently, partnerships. AFDO believes the time is right to get beyond partnerships and for all major stakeholders at the federal, state, industry, and consumer level to work to develop a "blueprint" for the establishment of a fully integrated national food safety system.

FOOD SAFETY Tools



AN A.F.D.O. VISION

FOOD SAFETY Mechanisms



AN A.F.D.O. VISION

INTEGRATING THE FOOD SAFETY SYSTEM

AN AFDO VISION

A fully integrated national food safety system consists of common ownership by federal, state, and local government agencies organized to reduce or eliminate foodborne illness and ensure that foods are safe, sanitary, wholesome, and honestly represented. This system utilizes necessary and appropriate food safety funding, resources and support at all levels with oversight and guidance provided by federal agencies.

Federal Government Major Functions:

- **Training**
 - Federal/State Relations
 - Satellite Courses (Food Micro, EPI, Traceback)
- **Certification**
 - Seafood HACCP
 - LACF
 - FSTE A
 - Standards/Qualifications for Inspectors or Investigators.
- **Risk Assessment**
 - Evaluation of Data from States
- **Program Evaluation**
 - Expansion of Retail Standards Program (Self-Evaluation)
- **Imported Foods**
 - Increased Inspection at Entry Level
 - Recall Coordinators
- **Research**
 - Development of Quick Detection Methods
- **Science**
 - Science-Based Approaches
 - Science-Based Regulation
- **Standards**
 - International and Domestic
 - Codex
 - Regulation (NLEA)
- **Lab Practices**
 - Uniform State and Federal Government

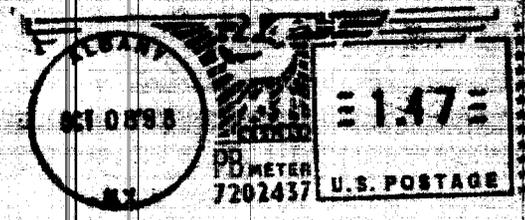
Federal Government Major Functions: (cont'd.)

- **Additives**
Petition and Approval
- **Packaging**
Petition and Approval
- **Funding**
Cooperative Agreements
Block Grants
Funding to Support (full or partial)

State/Local Government Major Functions:

- **Inspections**
Food
Animal Feed
Economic
- **Investigations**
Foodborne Illness
Food Tampering
Recalls
- **Complaints**
Consumer Complaints
Industry Inquiries
- **Sampling**
Routine
Special Assignment (Apple Juice)
Contract and Partnerships
- **Analysis**
Follow-up Action
HACCP Verification
- **Compliance**
Innovative Measures
License or Permit Revocation
- **Enforcement**
Civil Penalties
Food Seizure

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