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Dockets Management Branch (HFA-305)  
Food and Drug Administration  
12420 Parklawn Drive, Rm. 1-23  
Rockville, MD 20857  
Docket No. 97N-0074

NATIONAL  
FOOD  
PROCESSORS  
ASSOCIATION

Dear Sir or Madam:

Thank you for the opportunity to add comments to our October 2, 1998, oral testimony on the proposed vision statement and other matters before the President's Council on Food Safety.

Let me begin by noting that the National Food Processors Association is the premiere scientific trade association representing the \$430 billion food processing industry with member operations in all 50 states and points throughout the world. With three laboratory centers, NFPA is the leading authority on food science and safety and has served the industry for 90 years in government and regulatory matters, scientific research, technical services, communications, education, and training.

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As such, we hope our expertise will be helpful to the Council and all those interested in sound science for food safety as your work and ours advances toward more specific topics.

In the meantime, let me concisely restate our views on the shape and goals of our country's food safety system. To our mind, this discussion inevitably begins and ends with six specific elements that are essential to food safety policy and the regimens that implement it. NFPA believes the following ideals must be emphasized in words and realized in actions:

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**Research:** There remains one persistent problem that impedes other forms of research and has a crippling effect on accurate risk assessment: factual statistics. Lacking unassailable data, numbers fall prey to the perfidy of junk science and agenda politics. Harm is inflicted on everyone, it seems, except those who employ such tactics to justify their pretexts. Accurate statistics advance the discussion; floating estimates contaminate the debate.

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**Unified policy:** Without debating misguided "single agency" proposals, let me express our staunch support for a unified food safety policy, which the invitation for comments and the emerging process contemplates, I believe. Our nation's food safety scheme evolved to meet changing challenges to consumers' health and the legal and regulatory schemes designed to protect them--and they have. Along the way, each agency, each system, developed unique approaches to meet singular needs and that's as it should be. Still, some overarching policy is needed to provide cohesion and to open avenues for the smooth and productive flow of ideas, research, and expertise. Disagreements will arise, but it's imperative for everyone to travel using the same map.

**Science-based:** If we were to say that some parts of the food safety net are more equal than others, this would be at the top of the list. Any valid and effective scheme must employ sound, proven, accepted, and objective scientific methods. Otherwise it lacks integrity and degenerates into an untrustworthy, unreliable, and indefensible system incapable of adequately protecting consumers' health.

**Risk-based:** This is another linchpin. If the system cannot automatically discern between real threats to the health of consumers and mere technical infractions, the allocation of resources will produce truly dangerous inconsistencies, shortfalls in protection, or worse. Prioritizing real or potential hazards and balancing the severity of the threats against the resources needed to combat them stands at the core of our efforts. I believe we can agree on and achieve something so basic and indispensable.

**Enforcement:** Enforcement is necessary, of course, but constant, in-plant, in-field, and end-product testing is costly, labor intensive, and, perhaps, outdated. A system-wide inspection scheme verified by random, plant- and field-specific tests would provide ample protection and a new flexibility so agencies could redeploy manpower and money to high risk hazards.

**Private sector:** The federal government does not stand alone to combat bad product--its agencies are a small part of a legion of food company scientists. This, too, is as it should be--because it works. Any conscious failure to process and produce safe food would lead to such losses in reputation, customers, and sales as to be unthinkable. Free market incentives and a desire to process safe and enjoyable food

can yield astonishing results, and should be allowed to do so by eliminating unnecessary roadblocks.

**Conclusion:** This is, of course, only a sketch of the issues and interests attending the Council's efforts to promote food safety. We offer it as a roadbed on which to build new and better avenues to sound science knowing that further, more detailed proposals and discussions lie ahead. As part of that admirable endeavor, let me guarantee NFPA's willingness to help construct and implement a food safety scheme that relies on these elements, and by inviting you to call on us, our regulatory specialists, and our scientists to advance this enterprise.

Thank you, again, for this opportunity to reiterate our views.

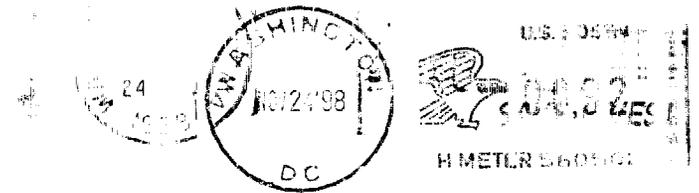
Sincerely,  


Kelly D. Johnston  
Executive Vice President  
Government Affairs and Communications



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