A National Integrated Food Safety System: A Produce Industry Perspective

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PMA Issues Leadership – key, high priority areas of focus and importance for our members across the produce supply chain.

- Improved Foodborne Illness Outbreak Response
- FSMA Implementation
Background:

- Accuracy and speed are essential.
- Investigations are multi-jurisdictional and multiagency responses.
- Requires coordinated effort.
- Requires timely sharing of information.
Foodborne Illness Outbreak Response

Issues:

- States are the first responders, yet they are resource constrained (epi: patient interviews, sampling & traceback).
- Information sharing is constrained.
- Media scrutiny and demands to identify a likely food vehicle are extraordinary.
- States have a statutory obligation to protect the public health of their states citizens.
- States have limited perspective on an outbreak without CDC and FDA information.
Integrated Food Safety System Solutions:
- Increased funding for public health agencies
  - Joint Training (involve industry) e.g. CALFERT
  - Lab Capacity
  - Post Response – education outreach to industry
- Greater coordination & information sharing.
- Engage industry subject matter experts to help in understanding supply chains.
**FSMA Implementation**

**Background:**
- FDA has proposed an integrated approach to FSMA implementation.
- Accessing local knowledge and expertise is essential.
- State-led models seem to work well CA & AZ LGMA, FL TGAPs, etc..
- Easier to teach an aggie food safety than teach a food safety professional everything there is to know about agricultural production and handling systems.
Figure 1.7-4. Regions where covered produce in the U.S. is grown
Issue: Market Access Audits vs Compliance Inspections

- How will states and FDA span the roles of educator, market access auditor and regulator?
- How can industry market access audit results be used to inform FDA/State work plans?
- USDA AMS and FDA are already working on harmonizing audit criteria and the FSMA Produce Rule requirements.
- How does one harmonize auditor/inspector competency and proficiency?
Background: Harmonized Compliance Criteria

- 50,000 ft level - FSMA Statute
- 10,000 ft level - FSMA Regulations
- On the Ground - FSMA Compliance Guides
  - Education outreach
  - Training
  - Harmonize compliance verification across agencies
Issue: Harmonized Compliance Criteria

- Inspectors will encounter numerous preventive controls, what is in compliance? and what is out of compliance?
- Need a process that is:
  - Consultative:
    - Academia,
    - Industry &
    - Government (Fed & State)
  - Deliberative
  - Harmonizing
  - Consensus Building
  - FDA has final editorial decision
**FSMA Implementation**

**Issue:** Harmonized Compliance Criteria

- Is the Conference for Food Protection the model?
- CFP: FDA Model Food Code provides continuity across multiple jurisdictions and agencies.
  - Consultative:
    - Academia,
    - Industry &
    - Government (Fed & State)
  - Deliberative
  - Harmonizing
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Questions?

Thank You
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