



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



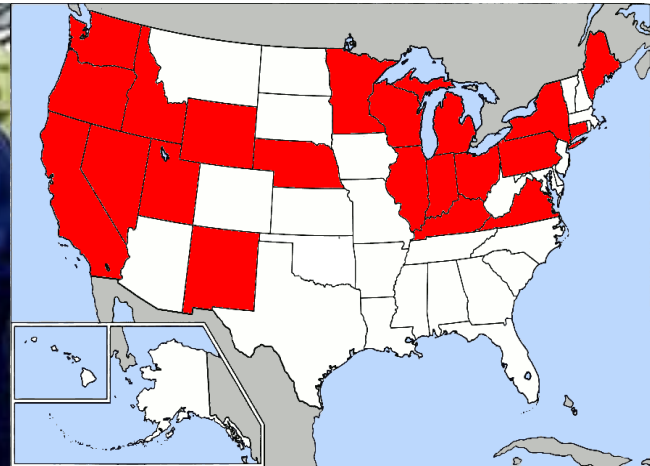
**FDA FOOD SAFETY
MODERNIZATION ACT**



Foodborne Illness Outbreak Response

Background:

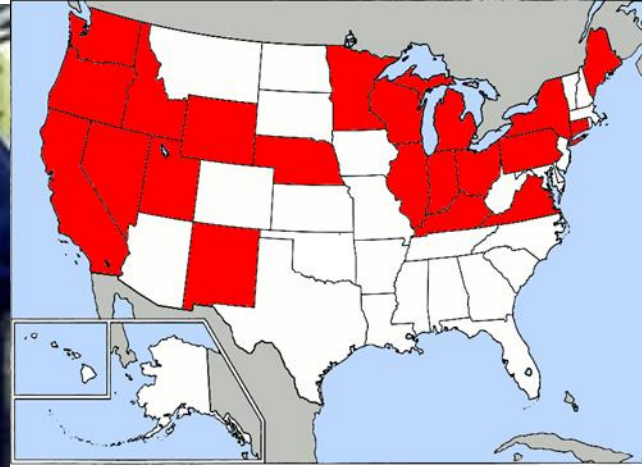
- ❖ Accuracy and speed are essential.
- ❖ Investigations are multi-jurisdictional and multiagency responses.
- ❖ Requires coordinated effort.
- ❖ Requires timely sharing of information.



Foodborne Illness Outbreak Response

Issues:

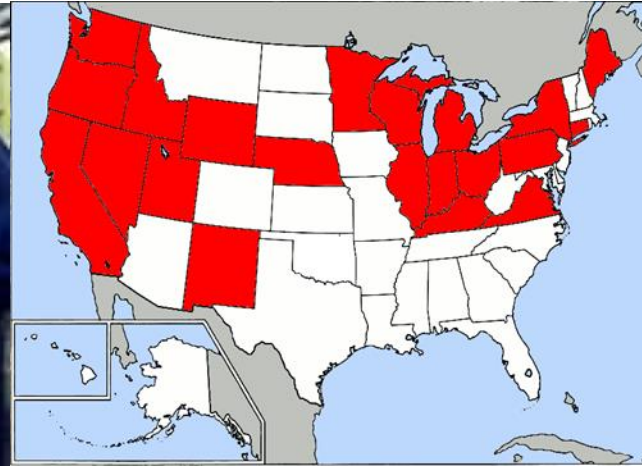
- ❖ States are the first responders, yet they are resource constrained (epi: patient interviews, sampling & traceback).
- ❖ Information sharing is constrained.
- ❖ Media scrutiny and demands to identify a likely food vehicle are extraordinary.
- ❖ States have a statutory obligation to protect the public health of their states citizens.
- ❖ States have limited perspective on an outbreak without CDC and FDA information.



Foodborne Illness Outbreak Response

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-webs.



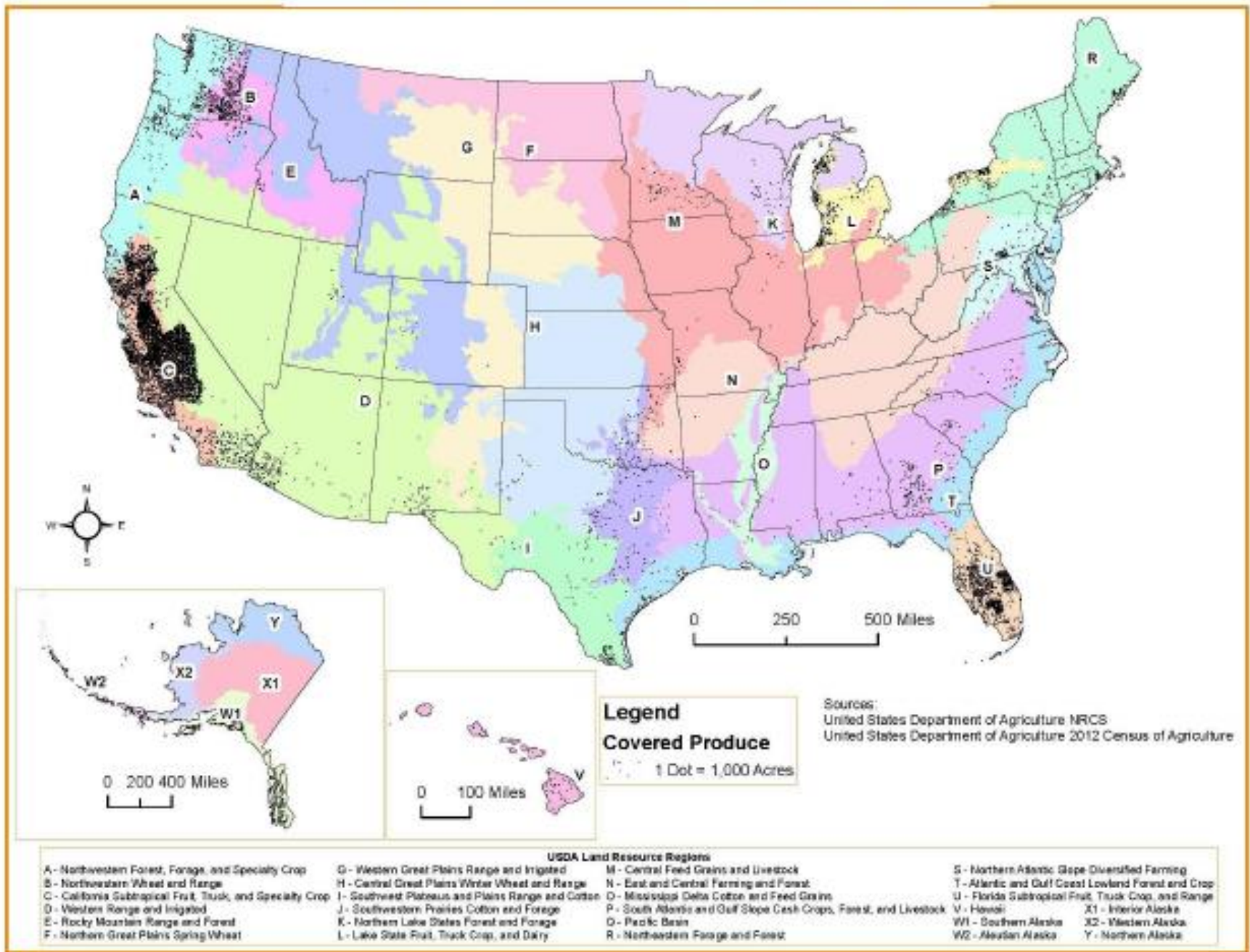
FSMA Implementation

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



FSMA Implementation

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?



FSMA Implementation

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



FSMA Implementation

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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