



Association of Food and Drug Officials

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Dear Mr. Taylor and Ms. David:

The Association of Food and Drug Officials (AFDO) is a non-profit professional organization consisting of state, federal, and local regulatory officials as members, with industry representatives participating as associate members. From its very inception over 113 years ago, AFDO has recognized the need for uniform laws and regulations and has actively promoted uniformity and cooperation among regulatory agencies at all levels. AFDO has also promoted the concept of a fully integrated national food safety system, which utilizes the resources and authorities of all levels of government as an effective means for meeting existing and new food safety challenges.

AFDO is pleased to have participated in The George Washington University project to examine the roles and responsibilities in our current food safety system and make recommendations for strengthening it. AFDO views the resulting report: *Stronger Partnerships For Safer Food - An Agenda for Strengthening State and Local Roles in the Nation's Food Safety System (hereafter "Agenda")*, as a critical blueprint for legislative and policy changes aimed at modernizing approaches to protecting our food supply.

The Agenda correctly identifies the responsibility at the federal level to help fund a truly national, integrated system that capitalizes on willing state and local commitment and participation. It has long been recognized by AFDO that state and local resources can more fully be leveraged so that system capacity can be built. For their part, state and local agencies must commit to meeting recognized standards in order to demonstrate uniformity and reliability of the vast amount of work they produce.

This Agenda, for the first time, lays out comprehensive and specific steps needed to strengthen state and local roles. AFDO particularly expresses agreement with the following Agenda recommendations:

1. Congressional support is required to push mandatory changes that are needed to establish a fully integrated food safety system.
2. A strong food safety leadership structure should be established to strengthen federal-state-local partnerships.
3. An inter-governmental council can serve to effectively foster collaboration.
4. Surveying current capacity is an essential first step in prioritizing steps to strengthen the system. AFDO is currently conducting a comprehensive regulatory resource survey at the state level that can be used to jump-start this process.
5. Capacity and performance benchmarks must be well planned and should apply to all participants.
6. State and local government has a responsibility to invest in food protection. Once agreed upon benchmarks are set, the federal government has a shared responsibility to adequately fund programs and build capacity at all levels.
7. A significant line item appropriation in FDA's budget should be used creatively to both provide base funding for state and local programs and to provide incentives for shared investment in continuous program improvement and innovation.
8. Steps should be taken to help state legislatures recognize the importance and levels of adequate and sustainable funding for state and local food safety programs.
9. Focal points should be established in each state between multiple agencies and disciplines to better communicate within a national framework.
10. Research is needed to identify preventative approaches that must be used to develop model laws and regulations reflecting an integrated system. AFDO has a history in participative develop of model laws and regulations and particularly commits to assisting with this recommendation.

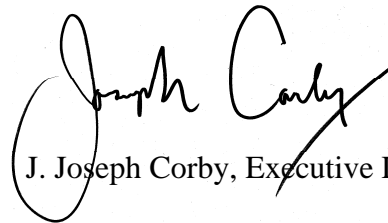
11. There is a critical need to modernize the way the food protection system, at all levels, prepares its field forces to face the growing challenges and complexities of an increasingly global food supply. AFDO has already begun the process of establishing a food protection training institute. Training must be standardized and coordinated across the food protection community in order to support an integrated system. It must also be career-spanning and includes not only core technical training but advanced specialization in order to cross-utilize resources (thereby increasing capacity). Leadership training is also a critical component of a highly professional and effective national system.
- 12-14. Gaps must be closed between the epidemiologic/communicable disease community and the regulatory/environmental health community at all levels in recognition of the seamless communication that must occur to quickly identify, respond, and control illness outbreaks.
15. Recent industry traceability efforts for produce should be examined thoroughly to assess the success of voluntary (or retail-driven) efforts and potential mandatory requirements that can enhance these efforts.
16. AFDO supports the continuing efforts of CIFOR and will continue to participate in this collaborative approach to quicken outbreak response and recovery.
- 17-19. AFDO fully supports the concept of obligating to meet recognized program standards at all levels. This sets the bar that must be met for reliable participation by any party in an integrated system. AFDO is leading the drive to establish a process for the promotion, attainment, and further development of the manufactured food regulatory program standards.

AFDO applauds the outcome of this collaborative effort led by The George Washington University, School of Public Health and Health Services, Department of Health Policy to identify the immediate steps that must be taken to modernize the approach to protect the nation's food supply and achieve true integration of the resources of the food protection system. AFDO commits its continued participation to advance the recommendations of this Agenda.

Respectfully Submitted,



Gerald Wojtala, President



J. Joseph Corby, Executive Director