



## INTEGRATION OF THE FOOD SAFETY SYSTEM POSITION STATEMENT

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Maintaining a healthy, safe food supply is critical to the health of the community. It is a fundamental role of government, federal, state and local, to ensure that the food people consume is safe from contamination, be it intentional or unintentional. Incidents over the past years have indicated a failure in the food safety system undoubtedly resulting in diminished public confidence in governmental agencies and their abilities to keep the public safe. Outbreaks of *Salmonella* Saintpaul in jalapeno peppers<sup>1</sup>, *Salmonella* Typhimurium associated with peanut butter<sup>2</sup>, and the discovery of *E. coli* O157:H7 in raw cookie dough<sup>3</sup> have crossed many state boundaries and sickened thousands of people and demonstrate that the current food safety system is in need of serious review and improvement for this nation to truly meet the food safety threats of the 21<sup>st</sup> Century. This matter is further compounded by the complexities of modern food production technologies and processes, consumer demands and preference, and the explosion of global commerce.

Such events have demonstrated serious strain in the food safety system and have led the public health community to call for reform. The 2007 Food and Drug Administration's *Food Protection Plan* outlined a call for a renewed, integrated approach to food safety focusing on prevention, intervention and response.<sup>4</sup> The Government Accountability Office has named revamping food safety a key priority, citing inconsistent oversight, ineffective coordination, and inefficient use of resources as significant problems in the food safety system.<sup>5</sup>

The Association of State and Territorial Health Officials (ASTHO) strongly asserts the need for reform of key aspects of our nation's food safety system, and that any efforts aimed at improving the food safety system must recognize the critical role that State and Territorial Health Agencies play in protecting the health of the community. At nearly every critical juncture in the food safety system, states and territories carry an enormous amount of responsibility with limited resources, either through preventing foodborne illness outbreaks through regulatory actions or by responding to food illness outbreaks through epidemiological and laboratory activities.

**It is ASTHO's position that national efforts be made to integrate the food safety system to develop a sustainable, better coordinated prevention-oriented infrastructure. Integration of the food safety system must place a priority focus on improving state and territorial capacity, including federal line item funding, to protect the health of the community.**

*In recognition of the immediate need to enhance state and territorial food safety capacity and integrate state agencies into a comprehensive food safety system, ASTHO recommends the following policy actions:*

- 1) *Build state & territorial capacity to protect the community against foodborne disease.*
  - Streamline and bolster resources to support capacity building of state and territorial food safety programs. There is no single source of funding for state and territorial food safety activities. ASTHO supports the institution of core sustainable funding mechanisms, to help states and

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<sup>1</sup> CDC web site <http://www.cdc.gov/salmonella/saintpaul/>

<sup>2</sup> CDC web site <http://www.cdc.gov/salmonella/typhimurium/>

<sup>3</sup> CDC web site <http://www.cdc.gov/ecoli/2009/0630.html>

<sup>4</sup> FDA Food Protection Plan

<sup>5</sup> GAO Website



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territories strengthen their food protection infrastructure, ensure capacity and consistency across the states and territories, and integrate their activities to better prevent and respond to foodborne illness.

- Support and strengthen state-level food safety integration activities: Not unlike food safety at the federal level, state-level food safety activities are varied and spread across agencies. Federal agencies should support more effective integration of state-level food safety activities to ensure proper capacity between state/territorial and local agencies to protect against localized and multi-state foodborne outbreaks. ASTHO encourages standardized credentialing and training for state-local food safety inspection staff as well as recommendations for appropriate staffing levels for state/territorial and local food safety programs.
- Strengthen and integrate laboratory testing in support of state/territorial and local food safety initiatives. State/territorial and local governmental laboratories play a critical role in food surveillance activities and in foodborne outbreak response, including disease cluster detection through the PulseNet network. In order to effectively identify food contaminants, these laboratories must consistently use and validate appropriate methods, maintain the capacity to handle a large volume of samples, and report results promptly and securely to appropriate local, state/territorial and federal agencies. This can only be accomplished by dedicating scarce resources to method development, effective training programs, capacity building, and participation in nationally recognized accreditation programs. The development of electronic laboratory reporting mechanisms is a crucial component to any integrated food safety system.
- Enhance the food safety workforce. State/territorial and local food safety professionals are the principle governmental workforce that ensures safe food. State and territorial food safety professionals come from an array of disciplines including inspectors and regulators, epidemiologists, environmental health professionals, laboratorians, and other types of public health practitioners. The development of core competencies, standardized training of new and existing professionals, and integration of food safety practices will lead to a more prepared workforce ready to implement an increasingly science- and risk-based system. The International Food Protection Training Institute (IFPTI), a collaborative project between the W.J. Kellogg's Foundation and the Association of Food and Drug Officials, with the participation of ASTHO and other health and food safety associations can serve as the instrument for standardized, graduated, and continuing training of state and territorial food protection officials.

### 2) *Facilitate communication and coordination among agencies responsible for food safety.*

- Modernize communication mechanisms, policies and practices to share timely and accurate information: The food safety system is diverse and spread across multiple agencies with varying responsibilities and authority. Streamlining processes and delineating roles and responsibilities will assist in facilitating more robust and effective communication and coordination between and among the various agencies and private entities involved in food safety, including the food production, distribution and service industry. Policy efforts should focus on minimizing breakdowns of communication, encourage information sharing, such as recalled product distribution lists, standardizing data collection, and ensuring open and timely communication between and among all agencies.

- Support system-wide use of CIFOR guidelines: The Council to Improve Foodborne Outbreak Response (CIFOR) Guidelines for Foodborne Disease Outbreak Response were developed to aid government agencies responsible for preventing and managing foodborne disease.<sup>6</sup> The Guidelines aim to enhance coordination of federal, state/territorial, and local agencies to better prevent, detect, and respond to foodborne outbreaks. Resources should aid states and territories in the adoption, implementation, and improvement of these guidelines.

3) *Establish uniform food safety standards to prevent foodborne illness.*

- Collaboratively set uniform food safety standards: Federal agencies should work collaboratively with the states and territories to develop uniform food safety standards to ensure a consistent, science-based level of public health protection nationwide. This would build on the work of the Model Food Code, and insure consistency and integration of food safety inspection activities across the states and territories. The collaborative process of standard setting should also preserve state/territorial legal authorities and the rights of sovereign states and territories in the protection of the public's health.
- Enforce standards jointly and consistently among agencies: Federal, state/territorial, and local agencies should work collaboratively in the enforcement of these standards to ensure the same level of protection irrespective of the geographic location in the country.

**Approval History:**

*Environmental Health Policy Committee Review on September 23, 2009*  
*Executive Committee Review and Approval on October 16, 2009*  
*Position Expires on October 16, 2012*

*ASTHO policies are broad statements of enduring principles related to particular policy areas that are used to guide ASTHO's actions and external communications.*

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<sup>6</sup> CIFOR Guidelines