May 22, 2015

Contact: Joe Corby, 518-860-2838, jcorby@afdo.org

In a letter sent to Congressional leaders, the Association of Food & Drug Officials (AFDO) offered its strong support for increasing the U.S. Food and Drug Administration’s (FDA) food safety budget by $109.5 million, for Food Safety Modernization Act (FSMA) implementation. The letter is supported by AFDO’s Board of Directors, which includes a cross-section of state food safety agency program managers from across the nation.

The letter was sent to the House Committee on Appropriations Chairman Harold Rogers and Ranking Member Nita M. Lowey, and the Senate Committee on Appropriations Chairman Thad Cochran and Ranking Member Barbara A. Mikulski asking for their support in assuring adequate funding is provided for implementing FSMA and for fully preparing federal, state, and local food protection officials to work in the new integrated food safety system first envisioned by AFDO and now mandated through FSMA.

AFDO expressed its fear that inadequate funding would weaken the impact FSMA would have on reforming the nation’s food safety system and inhibit the training that will be necessary for industry to comply with the new requirements and government officials to ensure compliance. AFDO further stated that failure to adequately fund FSMA would result in disjointed implementation with dramatic negative consequences to the food processing and produce industries. AFDO offered some examples of the vital needs that included the following:

- Extensive training of inspectional staff for uniform application of FSMA rules;
- Smaller food processors need outreach and educational resources to comply with preventive control requirements;
- Produce growers need a consultative approach to implementation with outreach and educational resources to implement changes to their industry; and
- States must be provided adequate resources for the more complex preventive control inspections and to establish and maintain produce safety programs.

AFDO first promoted the vision of a nationally integrated food safety system in 1998 and has worked tirelessly since that time in advancing it.

About the Association of Food and Drug Officials:
AFDO is an international, non-profit organization that is in the forefront of streamlining and simplifying regulations by either drafting regulatory rules or by commenting on government proposals. By developing a broad base of support for new approaches, AFDO has become a recognized voice in determining the rules and shape of the regulatory playing field of the future. The consensus that AFDO develops is key to advancing uniform laws, regulations, and guidelines that result in more efficient regulation and less confusion among industry in the marketplace. AFDO develops support for its positions by interfacing with high-level regulatory officials, industry representatives, trade associations, and consumer organizations. This continues to have a significant impact on regulations at the federal, state and local level.
May 18, 2015

The Honorable Thad Cochran
Chairman, Committee on Appropriations United States Senate
Room S-128, The Capitol
Washington, DC 20510

The Honorable Harold Rogers
Chairman, Committee on Appropriations United States House of Representatives
Room H-305, The Capitol
Washington, DC 20515

The Honorable Barbara Mikulski
Ranking Member, Committee on Appropriations United States Senate
Room S-146A, The Capitol
Washington, DC 20510

The Honorable Nita Lowey
Ranking Member, Committee on Appropriations United States House of Representatives
1016 Longworth House office Building
Washington, DC 20515

Dear Chairman Cochran, Chairman Rogers, Ranking Member Mikulski, and Ranking Member Lowey:

The Association of Food & Drug Officials (AFDO) is the preeminent organization of federal, state and local food safety regulatory officials in the United States. During its 117 year history, AFDO has promoted uniform, science-based food safety laws and regulations and is well-recognized for advocating a nationally integrated food safety system that would better coordinate government resources at all levels in order to allow government agencies and officials to meet food safety challenges in a more effective and strategic fashion.

AFDO was a strong supporter of the Food Safety Modernization Act (FSMA) and since it became law we have promoted many efforts to advance its implementation. The new prevention oriented mandates of FSMA will greatly reform how we protect the safety of our food supply, and provide consumers the food safety system they deserve and demand. On behalf of the AFDO Board of Directors and the food protection professionals we represent, I am writing to you to ask for your support in assuring that adequate funding is provided for implementing FSMA and for fully preparing federal, state, and local food protection officials to work in the new integrated food safety system first envisioned by AFDO and now mandated through FSMA.
This fully integrated national food safety system will consist of common ownership by federal, state, and local government agencies organized to reduce or eliminate foodborne illness and ensure that foods are safe, sanitary, wholesome, and honestly represented. This system utilizes necessary and appropriate food safety funding, resources and support at all levels with oversight and guidance provided by federal agencies.

We fear inadequate funding will weaken the impact FSMA will have on reforming our food safety system and inhibit the training necessary for industry to comply with the new requirements and government officials to ensure compliance. Failure to adequately fund FSMA will result in disjointed implementation with dramatic negative consequences to the food processing and produce industries. Some examples of the vital needs are as follows:

- Extensive training of inspectional staff is required for uniform application of FSMA rules;
- Smaller food processors will need outreach and educational resources to comply with preventive control requirements;
- Produce growers need a consultative approach to implementation with outreach and educational resources to implement changes to their industry; and
- States must be provided adequate resources for the more complex preventive control inspections and to establish and maintain produce safety programs.

All of us as citizens who are consumers of food expect nothing less than the safest food supply scientifically possible. Without adequate funding of FSMA, this expectation cannot be realized. We would be happy to provide additional information or assistance. We greatly appreciate your consideration of our thoughts.

Respectfully submitted:

Joseph Corby
AFDO Executive Director