



JAN 10 2013

Claudia Coles
President
Association of Food and Drug Officials
2550 Kingston Road, Suite 311
York, PA 17402

Dear Ms. Coles:

Thank you for your letter, including Association of Food and Drug Officials (AFDO) Resolution Number 1 as adopted at your 116th Annual Education Conference held June 2-6 in Providence, Rhode Island.

The Food and Drug Administration (FDA) will continue to work with AFDO and other stakeholders to improve and enhance the safety of our food within the parameters of the Food Safety Modernization Act, and to the extent possible, ensure uniformity and consistency in regulatory approaches. We agree that conflicting and inconsistent laws are not conducive to the development of an integrated food safety system as envisioned by the Food Safety Modernization Act.

FDA welcomes receipt of AFDO's position on Food Freedom Laws and will carefully consider the position. We look forward to the opportunity for future collaborations with AFDO on endeavors to support our common goals of ensuring the protection of public health.

Sincerely,

Michael R. Taylor
Deputy Commissioner for Foods
and Veterinary Medicine

Sincerely,

Deborah M. Autor
Deputy Commissioner for Global Regulatory
Operations and Policy



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Claudia Coles
President
Association of Food and Drug Officials
2550 Kingston Road, Suite 311
York, PA 17402

Dear Ms. Coles:

Thank you for your letter, including Association of Food and Drug Officials (AFDO) Resolution Number 2, as adopted at your 116th Annual Education Conference held June 2-6 in Providence, Rhode Island.

The FDA Foods and Veterinary Medicine Program (FVM) acknowledges the importance of funding in the success of the Rapid Response Team (RRT) Project, and that elimination of federal funding for this project would most likely negatively affect the ability of the state to provide an equivalent level of service and capability for integrated rapid response.

The FVM senior leadership is very committed to Federal, State, Local, Tribal, and Territorial integration, as mandated through FSMA and evidenced through ongoing FVM investments in building an Integrated Food Safety System and the Partnership for Food Protection. The RRT Project is a shining example of the success that relatively modest investments in integration can yield and has support from the highest levels of Agency management. That being said, cooperative agreements, such as the RRT Project, are always subject to the availability of federal funds, which do fluctuate from year to year based on congressional priorities.

To address the inevitable fluctuations in federal funding, FVM staff have encouraged participating states, since 2008, to actively work towards sustainability of the RRT concept by incorporating the processes and best practices developed under this funded agreement into existing program infrastructure wherever possible. We appreciate that state and local agencies continue to be adversely impacted by budget shortages. The FVM will continue to work with state agencies to document and demonstrate the positive results gained from RRTs to help achieve long term sustainability of the RRT efforts.

The FVM acknowledges the need to incorporate best practices into future RRT cooperative agreements. As evidenced in the 2012 RRT RFA, under which 10 new states were added to the project, implementation of the RRT Best Practices is now an expectation of the cooperative agreement. The FVM will continue this approach in any and all future RRT cooperative agreements. The FVM will continue to work closely with the Manufactured Food Regulatory Program Alliance (standard 5) and will continue to share recommendations with all state programs, through the RRT Best Practices Guide.

Sincerely,

Michael R. Taylor
Deputy Commissioner for Foods and
Veterinary Medicine

Sincerely,

Deborah M. Autor
Deputy Commissioner for Global Regulatory
Operations and Policy



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President
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2550 Kingston Road, Suite 311
York, PA 17402

Dear Ms. Coles:

Thank you for your letter, including Association of Food and Drug Officials (AFDO) Resolution Number 4, as adopted at your 116th Annual Education Conference held June 2-6 in Providence, Rhode Island.

The FDA Foods and Veterinary Medicine Program (FVM) recognizes the importance of aflatoxin as a potential hazard in the food and feed supply. A wealth of aflatoxin occurrence and prevention information is available through published scientific papers from academia, government, and industry and through regulatory guidance documents. The FVMP is committed to working with the Preventive Controls Alliance to develop additional training materials.

Sincerely,

Michael R. Taylor
Deputy Commissioner for Foods and
Veterinary Medicine

Sincerely,

Deborah M. Autor
Deputy Commissioner for Global Regulatory
Operations and Policy



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President
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2550 Kingston Road, Suite 311
York, PA 17402

Dear Ms. Coles:

Thank you for your letter, including Association of Food and Drug Officials (AFDO) Resolution Number 5, as adopted at your 116th Annual Education Conference held June 2-6 in Providence, Rhode Island.

The FDA Foods and Veterinary Medicine Program (FVM) embraces the need for inclusion of industry as a critical partner in an integrated food safety system. Historically, FVM has collaborated with industry in the development and delivery of training. Currently, steps are being taken to increase industry's participation where appropriate in the planning, development, and delivery of future training. Examples of this can be found in the on-going cooperative grant work funded by FDA as part of the agency's integrated food protection training and certification system.

These initiatives include the revision of existing courses, creation of on-line and face-to-face courses, stand-alone educational modules, and the development of certification programs. For example, industry is currently participating in the development of the Acidified Foods curriculum and milk safety training. Another example of collaboration with industry is found in industry's participation in and leadership of the various alliances that have been formed to develop training in support FSMA. These include Preventive Controls, Produce Safety, Manufactured Food Regulatory Program, and Sprout and Seafood HACCP Alliances, each with an emphasis on meeting the needs of small businesses.

All of our training is designed and developed to meet International Association for Continuing Education and Training standards. The IFPTI quality and content standards referenced in AFDO resolution number 2012-05 are being developed as one of the FDA/IFPTI cooperative grant projects. The standards have not been finalized but currently include a reference to the IACET standards. We expect that all of our training courses will meet the IFPTI standard for quality and content.

Sincerely,

Michael R. Taylor
Deputy Commissioner for Foods and
Veterinary Medicine

Sincerely,

Deborah M. Autor
Deputy Commissioner for Global Regulatory
Operations and Policy