



OCT 22 2013

RECEIVED OCT 25 2013

Mr. Joseph Corby
Executive Director
Association of Food and Drug Officials
2550 Kingston Road, Suite 311
York, Pennsylvania 17402

Dear Mr. Corby:

Thank you for your letter regarding the Association of Food and Drug Officials (AFDO) Resolution Number 2013-3 (Uneviscerated Processed Fish), as adopted at your 116th Annual Education Conference held on June 8-12, 2013, in Louisville, Kentucky.

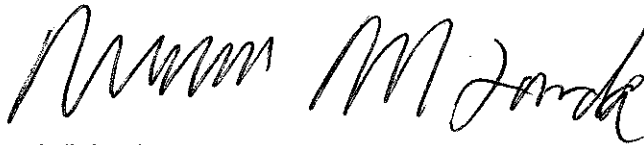
The Food and Drug Administration (FDA) has reviewed Resolution Number 2013-3 regarding the risk of botulism associated with the consumption of uneviscerated fish products that are salt-cured, dried, or smoked and the need for strategies other than traditional inspection and enforcement to address this risk. We agree with the spirit of the Resolution, and are proceeding consistent with it, as described below.

FDA recently made extensive modifications to Import Alert 16-74, "Detention Without Physical Examination of Uneviscerated Fish or Partially Eviscerated Fish that are Either Salt-Cured, Dried, Smoked, Pickled, Fermented or Brined (i.e., excluding LACF and Acidified Products Filed Under 21 CFR 108/113 or 114)" to more clearly define the specific products that are covered under the Import Alert. This has enabled FDA import staff to more effectively screen entries and target for further review those seafood products that are more likely to pose a public health concern. Since these modifications were made, the detention and refusal of shipments of uneviscerated or partially eviscerated processed fish by FDA has increased dramatically. This Import Alert is available online at http://www.accessdata.fda.gov/cms_ia/importalert_48.html.

Additionally, FDA is currently assessing published guidance and other communication materials regarding this issue to determine if they need to be enhanced or improved. FDA will modify such documents and materials as deemed appropriate; create new communication materials, if warranted; and will subsequently develop and implement, with AFDO assistance, an outreach and education plan focused on appropriate stakeholders. For example, we may perform education and outreach through the strategic placement of applicable materials on various Federal/State and/or association websites, as well as through the dissemination of such materials through targeted community engagement and appropriate social and business networks.

FDA welcomes the support of AFDO as a partner in the removal of illegal uneviscerated processed fish from U.S. commerce. We believe that AFDO plays a vital role in the development of an integrated food safety system which will serve to create a safer food supply for all.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael M. Landa". The signature is fluid and cursive, with the first name being more prominent.

Michael M. Landa
Director
Center for Food Safety
and Applied Nutrition