
ASSOCIATION OF FOOD AND DRUG OFFICIALS

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RESOLUTION NUMBER 2015-3

Submitted by: AFDO Board of Directors

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Concerning, FDA support for research on compliance assistance approaches to food safety inspections in order to enhance FSMA implementation

Whereas, food safety investigator competencies in educating and communicating with firms will become critical as FDA adopts an “educating before regulating” enforcement strategy in implementing the Food Safety Modernization Act; and

Whereas, FDA is developing new compliance tools under FSMA that include “Voluntary correction of problems at the facility level, achieved immediately during the course of an inspection through communication with firm management by investigators and, as needed, Center technical staff” (<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm395105.htm>); and

Whereas, some state- and local-level food safety agencies employ a compliance assistance approach that encourages investigators to educate and communicate with firm personnel, providing models on which the FDA may base this strategy and that may inform investigator training; and

Whereas, research in the state of Michigan (Buckley 2015) suggests 1) that firm compliance increases when investigators adopt a compliance assistance approach and 2) that competencies in educating and communicating are shaped by individual investigator traits, supervisor styles, and agency culture; therefore, be it

Resolved, that AFDO recommends that FDA support research on compliance assistance as it is employed by food safety agencies, with the objectives of 1) characterizing ways in which investigators educate and communicate with firms; 2) identifying outcomes for firm compliance; 3) characterizing personality and other traits of individual investigators, the styles their supervisors employ, and the culture of the agency; 4) investigating correlations among these variables; and 5) making training and guidance recommendations based on findings.

Reference: Buckley, Jenifer A. 2015. Food safety regulation and small processing: A case study of interactions between processors and inspectors. Food Policy 51: 74-82.