The Integrated Food Safety System

IFPTI
AFDO Pre-Conference Workshop
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Providence RI.
The Integrated Food Safety System

- IFPTI proposed course
- Provide awareness and understanding of what an integrated food safety system is
- Template provided on what agencies can now do to integrate
- Program evaluated by FDA Officials 5/18/12
- Upcoming pilots planned
The Integrated Food Safety System

- History of Federal/State Cooperation
- Regulatory Program Standards
- Basic Concepts of Food Law
- Communication
- Resources/Tools and Laboratory Integration
- Inspection & Enforcement Integration
- Outbreak Surveillance & Response
- Product Recalls
- Coordinated Food Defense Strategies
- Developing an Integration Plan
Module 1 - History of Federal/State Cooperation

What is Integration??

Not very clear?
Many types - (Racial, Social, Horizontal, Vertical, Data, Systems, and Technology)
Generally means combining parts so they work together or form a whole
How Well are We Integrated Today?

14 Federal Agencies and 71 Agreements
Multiple State Agencies = 75
County, City, and Townships = 2800

Is Integration Practical?
Practical ??

- 351 Health agencies spread out among state, county, city, and township
- Where do we begin to build an integrated system?
History of Food Laws

- 1906 Food & Drug Act
- FD&C Act of 1938
- 1968 – Reorganization places FDA in the Public Health Service
- 1969 - FDA begins administering Sanitation Programs for milk, shellfish, food service, and interstate travel facilities, and for preventing poisoning and accidents. These responsibilities were transferred from other units of the Public Health Service.
- Food safety Modernization Act
- History of Collaboration
Module 2 – Food Regulatory Program Standards

- Regulatory Foundation
- Training Program
- Inspection Program
- Inspection Audit Program
- Food Emergency Response (foodborne illness, adulterated food, natural/intentional contamination, preparedness)
- Compliance and Enforcement Program
- Industry and Community Relations
- Program Resources
- Program Assessment
- Laboratory Support
- Sample Collection

Application to Foreign Inspections!
Group Exercise

1. Has not updated their GMP regulations for 18 years
2. Does not have a FBI response protocol
3. No formal training program for inspectors
4. Inspection policies and procedures not updated since 1994
5. No system to track critical violations and chronic violators
6. No quality system for reviewing inspections, reports and enforcement actions
7. Food laboratory is not ISO17025 or equivalent
8. Need to do outreach on sprouts with industry and consumers
9. No recall procedures in place
Module 3 – Basic Concepts of Food Law

- Motivations
- Needs
- Authorities

Roles/Responsibilities
- Federal
- State
- Local
Food Safety Modernization Act

- Prevention
- Enhanced Partnerships
- Import Safety
- Inspections, Compliance, and Response
Module 4 - Communication

• Old and new communication tools
• Post incident hot washes
• NIMS
• Essential for integration
• Identify stakeholders
• Effective strategies
Communication

- Collaboration between constituents
- FDA State Communication Field Management Directive
- Incident Command System
- Food Protection Task Forces
- Hotwash
Module 5 – Resources/Tools and Lab Integration

Laboratory Networks

- PulseNet
- Food Emergency Response Network (FERN)
- eLEXNET
- Laboratory Response Network (LRN)
- Integrated Consortium of Laboratory Networks (ICLN)
Surveillance Systems

• PulseNet

• FoodNet

• State Electronic Syndromic System

• National Notifiable Diseases Surveillance System

• VetNet and other systems
Information and Intelligence Sharing Systems

- PulseNet web-board
- FoodShield
- Epi-X
- Health Alert Network
- Homeland Security Information Network (HSIN)
- InfraGard
- Law Enforcement Online (LEO)
Examples of Integration
Federal/State:

• Food Emergency Response Network (FERN)

• USDA:AMS Pesticide Data Program (PDP)

• USDA:AMS Microbiological Data Program (MDP)

• These programs involve multiple state food protection programs, laboratory programs and have robust data sharing infrastructure and harmonization of methodological approaches
Exercises

1. Identify examples of laboratory integration within your local and state food protection programs. List examples of things you can do to improve integration.

2. Identify examples of laboratory integration between your local/state food protection programs and allied federal programs. List opportunities to facilitate integration between your local/state programs and your federal partners.
Module 6 – Inspection & Enforcement Integration

• Reduced inspection and enforcement costs

• Smooth and effective means of addressing multi jurisdictions

• Maximum force of authority

• Impact on other regulated establishments

• True "institutionalization” = Improved Uniformity
Case Studies
Module 7 - Outbreak Surveillance & Response

- Outbreak surveillance
- Outbreak investigation
- Outbreak response
- Multiple agencies

- Barriers
- Roles
- Improvement steps
Wilted Woes Exercise
Module 8 - Recalls

- Coordination with other agencies and industry
- Effective recalls through integration
Module 9 – Coordinated Food Defense Strategies

Recognizing food production agriculture and the US food supply system as part of the US critical infrastructure.

Identify DHS methods used to increase awareness levels for the defense of the food supply system from production to consumption.

Describe accepted procedures for safe food handling and methods of providing food to individuals affected by a disaster.
Emergency Management Cycle

- Mitigation
- Planning
- Preparedness
- Response
- Recovery
Module 10 - Developing an Integration Plan

• Identify the agencies to be involved
• Brief decision makers
• Select your working group
• Identify support group (facilitator & recorder)
• Assemble supporting materials
• Make sure working group is familiar with materials
• Decide on a timeframe for completing the process
Prioritize Focus Areas

- Inspections
- Recalls
- Enforcement
- Foodborne disease outbreak investigations
- Food defense
- Communications (public & interagency)
- Emergency response (use of incident command)
- Training / staff development
- Technology and information sharing
- Laboratories
- Others
Integration Planning Exercise

• Develop a plan to improve coordination of recalls in your state using the concepts described in this lecture

• Break into small group and answer the following questions:
  – What agencies need to be involved
  – What are their authorities / policies / plans
  – What problems have existed in past recalls / lessons learned
  – What recommendations would you make going forward
“Integration may be the only way we can dramatically improve our national food safety system”