
ASSOCIATION OF FOOD AND DRUG OFFICIALS

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Submitted by: AFDO Laboratory Science and Technology Committee

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Concerning: The document entitled *Best Practices for Submission of Actionable Food and Feed Testing Data Generated in State and Local Laboratories*, Association of Public Health Laboratories

Whereas, a primary goal of an Integrated Food Safety System (IFSS) is to provide for the conditions where food regulatory agencies and laboratories can mutually rely on each other to ensure the safety of the nation's food supply and protect public health, and

Whereas, confidence in food and environmental samples analyzed by governmental food laboratories collected by regulatory agencies for surveillance, inspection, and investigation purposes is a critical element for mutual reliance, and

Whereas, the Partnership for Food Protection, Laboratory Task Group has identified three alternative conditions in the December 2013 Food/Feed Testing Laboratories Best Practices Manual (Draft), which a laboratory could meet to provide for confidence in their analytical programs:

1. Seek full ISO/IEC 17025 accreditation for their Food Laboratory of Food Testing section of a laboratory;
2. Laboratories meeting the standards contained in The Clinical Laboratory Improvement Amendments of 1988 (CLIA) regulations which occasionally perform food testing could apply their current requirements (CLIA) and fill in the gaps necessary for acceptance of their food analysis;
3. Consider deferring food testing to another agency within the state public health system or to another state or local laboratory accredited to ISO/IEC 17025 accreditation; and

Whereas, in 2014 APHL convened a Data Acceptance Workgroup to further define and clarify the gaps that would need to be filled primarily by state and local public health laboratories which choose option 2, above, and to focus on steps all state and local regulatory laboratories can take to encourage the acceptance and use of laboratory data by federal and other state and local regulatory programs, irrespective of laboratory accreditation status, and

Whereas, in 2016 APHL the Data Acceptance Workgroup completed its work and APHL published the *Best Practices for Submission of Actionable Food and Feed Testing Data Generated in State and*

Local Laboratories(hereinafter Data Acceptance White Paper), which presents best practices and tools which a laboratory may use to enhance the likelihood of data acceptability, and

Whereas, AFDO believes that the Data Acceptance White Paper has achieved the objective of a compilation of best practices and tools which a laboratory may use to enhance the likelihood of data acceptability, therefore be it resolved

Resolved, that AFDO requests the US Food and Drug Administration, state and local laboratories, and regulatory programs support the use of the Data Acceptance White Paper by non ISO/IEC 17025 accredited laboratories for establishing food analytical programs that produce analytical results that may be reviewed to determine if they are fit for use for regulatory purposes and the steps presented in the document that all state and local regulatory laboratories can take to encourage the acceptance and use of laboratory data by federal and other state and local regulatory programs, irrespective of laboratory accreditation status,