



Remarks for the Food Safety Summit Town Hall Session
Delivered May 12, 2021
Steven Mandernach
Executive Director of AFDO

Thank you for including AFDO in the Summit Town Hall session. AFDO represents the federal, state, local, and tribal food programs. 2021, is an exciting year for AFDO as it's our 125th Anniversary. As always, it's great to participate in this discussion with our colleagues from the federal agencies.

COVID-19, clearly has been a focus of the last year. I don't think our members expected this to be well over a year in activity. Just a quick update,

- Programs experienced over a 30% reduction in inspections from 2019 to 2020 and its unclear how many were virtual.
- Many food safety teams have been transitioned into COVID-19 response including vaccination clinics etc., thus reducing the food regulatory work.
- States are reporting that while they have experienced closures in food businesses, opening are nearly equal too.

Moving from COVID-19, AFDO remains excited about the work being conducted with the New Era of Smarter Food. Today I'm going to focus on the concept of mutual reliance which is a key component of the Blue Print.

Mutual Reliance is the foundation to an Integrated Food Safety System bringing state and federal partners together to improve industry compliance, avoid duplication of effort, ensure efficiencies, and prevent or reduce human and animal foodborne illness and outbreaks. It's a partnership, mutual endeavor with all aligned toward a common public health purpose. Our goal can't be widgets such as inspections—it must be public health based such as illness prevention and mitigation. The concept of an Integrated Food Safety System has been around over three decades and progress is continuous to enhance the work. The New Era



of Smarter Food Safety blue print identifies mutual reliance as one of the six core segments to implement innovative solutions for prevention and outbreak response. This concept is at work in all areas of human and animal food safety: retail, manufactured, animal, produce, milk, and shellfish.

The concept of mutual reliance and its importance in the effort to provide a safer food supply has many areas where regulatory partners can work together when there are comparable regulatory and public health programs.

- The work done by a partner should be shared with others who the work impacts. This is often referred to as data sharing or information exchange.
- Coordinating regulatory partners to plan their work to avoid duplicative efforts including risk prioritization/categorization, inspection frequency mandates, and comparing and reconciling inventory to assure the most accurate data.
- Providing information regarding inspections, compliance/enforcement, and corrective actions within all regulatory partners' jurisdictions.
- Coordination for the investigation of outbreaks and complaints.
- Coordinating sample collections and evaluating laboratory capacity, analysis, and reporting from the regulatory partners.
- Conducting and coordinating field staff training to ensure all regulatory programs have consistency and similarities with the work they do.
- Understanding the industry and consumer education being provided by regulatory partners and where this work can be shared.
- Sharing of organizational resources and personnel, when needed, to accomplish a larger and mutually public health objective.
- Development and monitoring of key domestic mutual reliance metrics—things like illness mitigation can be very difficult to measure.

Sharing inspection data. An example of how mutual reliance is a win- win situation for regulatory programs, industry, and public health is sharing inspection data. It encourages new and creative ways to work together, most importantly efficiency and best use of the rare resources. Many times, federal, state and local



programs are mandated to conduct inspections on a set frequency. When the inspection data can be shared with FDA, it eliminates the need to conduct inspections which are duplicative and saves money in the federal inspection program. Increased efficiency through mutual reliance can result in maximize resources which can further advance the work for food safety. Sharing inspection data limits the number of inspections needed, and interruption to industry while maintains the public health protections.

Consistency and Equivalency. When trusted partners work together, the outcome of the work will be the same regardless of the agency performing the work. Many jurisdictions are enrolled in Regulatory Program Standards which are financially supported by FDA. These standards are designed to ensure human and animal food programs are able to develop and sustain a well-trained workforce, build a quality management system for their program, and the infrastructure needed to sustain a successful program. Program Standards ensure confidence that programs are equivalent and are implementing and maintaining food safety with science-based decisions.

There are some key challenges in this area that must be addressed in order for the vision of domestic mutual reliance to be successful—

- Information sharing between all levels remains challenging with different FOIA type laws at all levels. At times, key information can't be shared, things such as distribution lists during recalls and outbreaks. For example, consumer complaint information even when the receiving entity does not have authority to investigate. We need to harmonize these information sharing challenges if we want to successfully implement mutual reliance.
- Information technology remains challenging and we have to figure out a way to transmit information such as inspectional information from all levels. Without this ability, we can't be successful. AFDO in conjunction with FDA and AAFCO has been coordinating a human and animal food data system that begins to demonstrate the strength of this work.
- Funding for state, local, tribal, and territorial funding must be stable and cuts should not be seen as a way to fill budget holes within FDA or the federal budget. Even small of funding changes at the these levels can



destroy programs, partnership, and trust required for domestic mutual reliance.

The retail programs throughout the country are housed within and regulated at state, local, and tribal organizations. Retail programs include the oversight of food establishments where food is sold directly to the consumer such as restaurants, grocery stores, convenience stores, farmers markets, etc. Mutual reliance is truly found in this area because FDA sets the standards at the federal level, and the state, local, and tribal jurisdictions are the ones who actually carry out the work. The new Produce Safety Rule is also set up to work in this manner.

We continue to also be excited about the collaborative work with FDA, CDC, AFDO, NEHA, NACCHO and CFP in the retail space with the retail food safety regulatory collaborative.