

December 5, 2019

Lowell J. Schiller
Principal Associate Commissioner for Policy
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

RE: Docket No. FDA-2019-N-4187 for “A New Era of Smarter Food Safety”

Dear Mr. Schiller:

The National Association of County and City Health Departments (NACCHO) appreciates the opportunity to respond to the Food and Drug Administration (FDA) request for comments regarding A New Era of Smarter Food Safety; (Docket No. FDA-2019-N-4187). NACCHO represents the nation’s nearly 3,000 local health departments, including the roughly 2,370 local health departments that regulate, inspect, or license retail food service establishments.

Local health departments are an essential part of the food safety system, ensuring that food is safe to eat at home, community events, restaurants, and schools. Local health departments work with state, local, and national partners to prevent, identify, and respond to outbreaks of foodborne illness. They also inspect restaurants, grocery stores, daycare facilities, hospitals, schools, and some food manufacturing plants to ensure safe food handling practices and sanitary conditions.

NACCHO’s comments are summarized by the following key points:

1. NACCHO supports FDA’s efforts to address the pivotal role that new and evolving digital technologies will play in tracing the origin of contaminated food to its source in minutes, or even seconds, instead of days or weeks.

NACCHO recommends the timely release of outbreak-related communications to ensure stakeholders and partners involved in response efforts are made aware of and have details of outbreaks as soon as possible (i.e., Incident Command System). In addition to being disseminated through federal agencies, communications should also be disseminated through partner organizations, industry stakeholders, and local and national media sources. Expedited communications to consumers should be sent through text messages, and social media platforms such as Facebook and Twitter.

2. NACCHO supports FDA’s efforts to make processes and communications more effective, efficient, and simpler.

NACCHO recommends the development of a food safety app that details outbreaks, and contains up-to-date food safety information for operators, regulators, and consumers. FDA should continue to establish best practices and opportunities for input on the Food Safety Modernization Act (FSMA).



3. NACCHO recommends FDA monitors e-commerce by developing partnerships that would promote the sharing of vital information between key stakeholders.

NACCHO understands that FDA faces the difficult challenge of staying ahead of food safety challenges that develop as a result of evolving business models. Therefore, NACCHO recommends FDA require all food providers and vendors to register with FDA before the sale and distribution of food to ensure food safety. In addition, FDA should also work with vendor platforms to ensure outbreak communications are occurring at every level and that communications are made as visually appealing and engaging as possible to encourage more interaction with available information on websites, newsletters, and other communication platforms.

4. NACCHO recommends FDA conduct an in-depth analysis of outbreak data to better understand the potential health risks of new business models.

NACCHO recommends FDA review outbreak data to determine if there are correlations between e-commerce and outbreaks and cottage foods and outbreaks. This includes reviewing and upholding current safeguards and established food safety standards already in place and developing new standards across the industry.

5. NACCHO strongly encourages FDA to explore current collaborations between FDA and industry to identify optimal food safety practices.

NACCHO recommends FDA review established connections between FDA and industry to determine successes and areas that need to be improved. Large industry providers that already have a system of food safety in place can be a source of best practices for FDA and other industry providers. In addition, there should be more opportunities for collaboration among FDA and industry to effectively spread messaging around food safety and to advocate for food safety priorities and changes.

6. NACCHO strongly recommends FDA collaborate with local, state, and territorial agencies, and industry change practices in the retail food industry that presents risks to public health.

NACCHO encourages FDA to provide support to their local, state, and territorial agency partners on training third-party food delivery service staff on basic food handling and safety training. The support that FDA provides to regulatory partners enables improvement of retail food safety practices across the nation. An example of this is the cooperative agreement FDA has with NACCHO to assist retail food regulatory programs in making progress towards conformance with the Voluntary National Retail Food Regulatory Program Standards through a mentorship program. The mentorship program has provided funding, technical assistance, and guidance to over 170 retail food regulatory programs across the nation to improve their implementation of food safety standards and relationships with industry partners. In addition, FDA should work with their partners and industry to disseminate clear and easily comprehensible messaging on food safety and outbreak issues to increase public understanding and actions during foodborne illness outbreaks.

NACCHO appreciates this opportunity to comment and applauds FDA's efforts to improve processes and tools needed for a safer food future. We look forward to continuing to work with you to protect the public from foodborne illness. Please contact Jennifer Li, Senior Advisor, Public Health Programs, for further information at 202-507-4242 or jli@naccho.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Tremmel Freeman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Lori Tremmel Freeman, MBA
Chief Executive Officer