



National Environmental Health Association (NEHA) Recommendations Improving the Effectiveness of State and Local Food Safety Programs

Food safety responsibilities at the state and local level reside in different agencies (health, agriculture, industry, and business regulatory agencies). The fragmentation of these programs hampers both the detection and response to incidents of foodborne illness. This has the additional and unfortunate consequence of impeding the essential coordination that needs to occur with the appropriate federal agencies. Without an effort to build the capacity and effectiveness of state and local food safety programs, we will be unable to build a comprehensive national food safety infrastructure that stresses the three essential elements of prevention, detection, and rapid response.

Federal initiatives to enhance state and local food safety programs must at the threshold recognize that there is no one single model that fits the needs of all state and local programs. Moreover, there should be collaborative programs that focus on capacity building, education, and leadership development. Additionally, regulations and model codes should have a clear basis in science.

As part of the larger effort to address these gaps and deficiencies in state and local programs, NEHA urges consideration of these recommendations in the following areas:

Surveillance

- Need for federal agencies, state, and local health jurisdictions to collaborate on a thorough and consistent process for screening food imports. Screening imports should be primarily a federal function.
 - Example: Our current system failed to spot many Chinese food products containing melamine until AFTER they had entered the country.
- Foster and improve communications and collaboration between federal agencies, state, and local health jurisdictions involved in food safety surveillance.
 - Example: Publication and dissemination of a regular (e.g., monthly) e-newsletter between and from federal agencies to state and local health jurisdictions, which would identify current federal concerns, activities, and recommendations.
- Promote access to information from multiple passive foodborne outbreak surveillance databases by federal, state, and local health jurisdictions.
 - Example: Pulse-Net has been a huge success in the area of nationwide sharing of data between public health laboratories and epidemiologists. Similar sharing of local health department reported foodborne illness data would be very useful, and several state and local programs have effective and efficient databases.
- Develop and utilize standardized reporting forms for use by federal, state, and local health jurisdictions.
 - Example: Universal adoption of a Web-based foodborne outbreak reporting form.

Inspection

- Provide federal funding to help build state and local capacity for regulatory food safety inspection and enforcement. Funding is needed to increase the number of state and local environmental health staff conducting food safety inspections and to provide them with equipment, training, certification (REHS & CP-FS) and standardization.
- Support continued development of a uniform food safety inspection program for all state and local health jurisdictions and encourage its adoption through federal funding.
 - Example: FDA has very successfully developed and regularly revised the FDA *Food Code* with the help of the Conference for Food Protection.
 - Example: FDA has developed excellent Model Retail Food Program Standards.
- Realign federal food safety inspection programs to focus on high-risk products and processes.
- Move away from mandated inspections at food processing plants to risk-based inspections throughout the food supply chain.
- Improve monitoring/inspection of the food safety practices of foreign food producers and suppliers.
- Improve sharing of federal inspection information with state and local health jurisdictions. Posting of these inspections documents to a secure password protected Internet network system would make these documents easily accessible and secure.
 - Example: One local health department had to file a FOIA request for a copy of the most recent inspection of a food manufacturing plant from a federal agency because of a question they had about a food product they observed in a local restaurant. Six months later they received a copy of the inspection that was so heavily redacted that it was useless and a bill for \$150.

Regulation

- Consider the possible benefits of creating a single federal regulatory food safety agency combining elements of FDA, USDA, and other agencies. The role of such an agency should be to support rather than supplant state and local food safety entities. However, CDC's current food safety functions should be maintained in that agency and enhanced.
- Create financial incentives for state and local food safety programs to meet the nine voluntary standards in the National Retail Food Regulatory Program.
- Encourage (but not mandate) more uniformity in regulatory codes nationwide.
- Give authority to federal agencies for mandatory recalls.
- Adopt federal regulations to require manufacturers and producers to trace (and recall) products from anywhere in the distribution chain. Federal agencies should monitor the system to assure traceability and recall effectiveness. States and localities do not have resources to follow-up on product recalls each year, nor is it efficient to have thousands of localities trying to implement the same recall.
- Mandate uniformity in product dating so consumers and regulators can differentiate between production dates, "sell by" dates, "use by" dates, and if dates are based on food safety concerns or product freshness considerations.

Food Safety & Food Defense Emergency Response

- Improve and integrate food trace back process (from farm to fork) with state and local health jurisdictions.
- Assist state and local health jurisdictions in support of staffing and training needs for foodborne outbreak investigation.
 - Example: Epi-Ready Team Training: Foodborne Illness Response Strategies course or FDA/ORAU courses.
- Provide training in food security response for state and local health jurisdictions.
- Involve, improve, and facilitate communication to include and integrate food industry into response to threats.
- Integrate industry into foodborne disease investigation and food security coordinated response training.
- Develop and integrate a consistent foodborne outbreak investigation training and protocol for state and local health jurisdictions.

Leadership

- Build state and local capacity in the area of leadership development training in environmental health.
 - Example: CDC's Environmental Public Health Leadership Institute.
- Develop a cadre of local environmental health managers who are available to assess the strengths and weaknesses of food safety programs in jurisdictions around the country.
 - Example: San Diego food safety program evaluation by NEHA.
- Support professional certification or registration (e.g., CP-FS or REHS) requirements for all food safety professionals in federal, state, and local health jurisdictions.