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November 8, 2010

Rob Nabors
Acting Deputy Director
White House Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: FDA Retail Food Safety Initiative

Dear Mr. Nabors:

The National Association of County and City Health Officials (NACCHO) and the National Environmental Health Association (NEHA) join in urging the President to include in his FY2012 budget funding to support the Retail Food Safety Initiative announced October 22, 2010 by the Food and Drug Administration (FDA).

FDA conducted a 10-year study of more than 800 retail food establishments to determine compliance with five key risk factors for foodborne illness in nine types of retail operations. These included schools, hospitals, and nursing homes, as well as markets and restaurants. This study provides the evidence to support a robust, science-based approach to food safety at the retail level, where food is handled, prepared, and stored prior to direct purchase by consumers and where a significant amount of preventable foodborne illness begins.

More than 3,000 state, local and tribal agencies have primary responsibility to regulate the more than one million food establishments in the United States. Successful regulation and enforcement at the retail level will reduce the enormous national costs of preventable foodborne illness, estimated at \$152 billion annually, including medical care, death, disability, and lost productivity.¹ The return on a federal investment in retail food safety will be measurable and high.

The FDA initiative includes increasing the presence of certified food protection managers in retail establishments, and funding and training local regulators to enhance local capacities for effective inspection and regulation. The need for these capacities is acute. Local health departments alone lost 15% of their workforce in 2008-2009, and further federal, state and local budget cuts that reduce local services to protect the public are continuing. Moreover, shortages of trained environmental health professionals competent to carry out effective retail regulation are widespread.

¹ Scharff, R.L., *Health Related Costs from Foodborne Illness in the United States*, Produce Safety Project at Georgetown University, 2010.

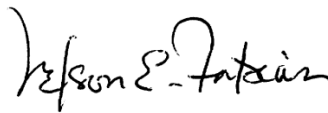
The presence of Certified Food Safety Managers in retail establishments is an important factor in achieving overall risk reduction in food service operations. It is not possible to attribute improvement in overall compliance with food safety standards to any single factor, due to the number of interdependent variables associated with any given food service operation. However, NACCHO and NEHA firmly believe that the comprehensive approach of FDA's Retail Food Safety Initiative will significantly enhance the capacity of local regulatory programs to achieve compliance with improved food safety standards, thereby reducing the incidence of foodborne illness. We strongly urge that FDA receive adequate resources to implement this initiative, which recognizes the critical importance of the food safety work that occurs locally to protect the nation's consumers.

NACCHO is the national organization representing the nation's 2800 local health departments. These city, county, metropolitan, and tribal agencies work every day to protect the health of their communities. NEHA is the national organization representing environmental health professionals practicing in public and private settings and academic institutions. Food safety and food protection is a primary focus of a majority of NEHA's membership.

Sincerely,



Robert M. Pestronk
Executive Director
National Association of
County and City Health Officials



Nelson Fabian
Executive Director & CEO
National Environmental Health Association

cc: Laurie Mignone