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USDA/FSIS Hearing Clerk
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102 Cotton Annex
Washington, DC 20250-3700

Re: Docket No. 98-045N Food Safety Initiative Strategic Plan

The American Farm Bureau Federation (AFBF) is pleased to provide these comments on the development of a comprehensive strategic Federal food safety plan. AFBF is the nation's largest general farm organization with affiliated state Farm Bureaus in all 50 states and Puerto Rico. AFBF represents the interests of more than 4.8 million member families across the country. Included in our membership are producers of virtually every crop and livestock commodity produced in the United States.

Farmers and ranchers have several reasons to have a strong interest in food safety. First they and their families are also consumers of the food which they produce. As such farmers and ranchers have the same desire as any other consumer to have a safe, abundant, affordable food supply. They also have an economic interest in the issue. If their operations are to thrive, it is important that consumption of the products they produce be increased. In order to do this both domestic and foreign consumers must be assured of the safety of the products they are buying and consuming.

Farmers and ranchers recognize the critical role that they play in assuring an abundant and safe food supply. They have demonstrated their commitment to this through the development and implementation of quality assurance programs for all livestock species and the widespread adoption of Integrated Pest Management (IPM) programs by crop producers. Their objective is to continue to produce the safest, most abundant and affordable food supply in the world. As an organization we work to assure that they can meet this objective. In order to accomplish this, producers need an agricultural research system that provides cutting edge technology along with a technology transfer system that makes the needed information available to them in a timely manner. They also need a handling and distribution system that maintains the safety of the food once it leaves their control, along with a science-based inspection system that assures consumers of the safety of our food supply.

AFBF supports increased international trade as a way to provide increased market opportunities for producers. We recognize that this also means increased imports of plant

and animal products, as well as processed food. Care must be taken to assure that increased trade does not result in unacceptable risks to producers and the public. Our "seamless" food safety system must also extend to imported products.

Several major issues currently face U.S. agriculture that have food safety implications. They include:

Food-borne pathogens: A variety of media bring reports of findings of food borne pathogens from around the nation and the world to consumers. Sources may be traced to either plant or animal products, so all producers need to be prepared to address the issue. Fortunately in many cases it appears that monitoring and surveillance programs are finding the potential problem before any reported illnesses. While questions do exist over the actual number of cases and the origin of the causative agents, food-borne pathogens present an issue that must be addressed. We are working to see that this is done throughout the food system.

Antimicrobial resistance of pathogens: An issue of increasing concern is the development of antibiotic resistance in pathogens. This has implications for farm animals, but the greater public concern is that these organisms may be transferred from animals to humans. This concern was the focus for a recent review by the National Academy of Science. A strain of *Salmonella typhimurium* DT104 that is resistant to five antibiotics, and which is being seen with increasing frequency, is the most commonly cited concern in this area.

Introduction of foreign animal diseases: Recent trade agreements include provisions to expedite the movement of products between nations. We support these agreements because they offer the potential of new markets. However, we recognize that by opening our borders through the regionalization process that has been implemented by USDA, producers face some increased risk of introduction of foreign animal diseases. The increasing level of international travel by the public also increases the potential of an inadvertent introduction of a foreign animal disease.

Zoonotic diseases of animals: We are close to completion of the eradication of two long-standing zoonotic diseases from the United States, brucellosis and bovine tuberculosis. Efforts must be made to assure that the eradication is completed, and that appropriate monitoring and surveillance programs are in place to prevent the reintroduction of these diseases. We also need to have the infrastructure in place to deal with other existing or emerging zoonotic diseases.

Potential loss of pesticides: Since 1988, the total number of crop protection tools available to farmers has decreased more than 50 percent, from about 40,000 in 1988 to less than 20,000 today. Although the need for conventional pesticides is reduced with the development of some genetically engineered crops, such as corn, soybeans and cotton, conventional pesticides are still essential for production of all conventional crops, including fruits and vegetables. With biotech crops, conventional pesticide alternatives are also essential for resistance management in pest populations.

Conventional pesticides are also key building blocks of Integrated Pest Management (IPM) programs. Through the use of IPM, farmers have dramatically increased their use of alternative pest controls such as crop rotation, natural predators and biological controls. Although IPM greatly reduces the overall use of pesticides, it cannot exist without occasional chemical controls during extreme infestations or when other practices fail. Many of these key IPM building blocks are threatened by EPA's implementation of the Food Quality Protection Act (FQPA).

Farm Bureau is very concerned that entire classes of crop protection products, particularly the organophosphates and carbamates, are threatened with cancellation or restriction by the Environmental Protection Agency's implementation of the Food Quality Protection Act of 1996. Such action will severely disrupt U.S. farm operations and will reduce the effectiveness and use of alternative controls. From an international perspective, cancellation of some crop protection products could displace domestically produced agricultural commodities with imports from other countries with less stringent pesticide and food safety regulations.

Limited numbers of approved animal health products: The number of animal health products available for use with animals is limited and prospects for additional new products do not appear great. It is important that the access to and viability of existing products be maintained and that the provisions of the Animal Drug Availability Act be implemented to facilitate access to additional products. This is needed to allow producers to care appropriately for their animals.

AFBF ACTIVITIES

AFBF is actively involved in several efforts to help address these food safety issues. They include:

Animal Health Emergency Management planning: Changing trade laws and static budgets for USDA have eroded the infrastructure that has protected animal agriculture. The potential shortcomings of our existing system were identified in a 1996 survey of state veterinarians.[2] The findings have prompted work by USDA's Animal and Plant Health Inspection Service (APHIS) and animal agriculture organizations to jointly develop an improved system to deal with the issue.[1] It is designed to prevent the outbreak of diseases to the greatest extent possible. If an outbreak was to occur, it seeks to limit the scope of the outbreak. In order to do this, coordination as well as adequate funding and personnel are needed at the national, state and local levels. AFBF has been a part of this effort from its inception and will continue to play an active role as the system evolves over the next few years.

Food Quality Protection Act: Workable implementation of the FQPA is now Farm Bureau's top priority. We are very concerned that the EPA's current implementation

strategy spells disaster for U.S. farmers and ranchers. Properly implemented, we believe the new law can work well for everyone, including consumers and farmers.

For satisfactory implementation, EPA must make major procedural changes. Most important, regulatory decisions affecting the registration and use of crop protection tools must be based upon good information and sound science. Unfortunately, risk assessments for new requirements of the law relative to extra margins of safety for children, common mechanisms of toxicity, drinking water and residential exposure are being made with incomplete data or no data at all. This methodological flaw is resulting in unrealistic, overly conservative "default assumptions" which greatly exaggerate actual risk and threaten the use of safe and essential crop protection tools. Farm Bureau is now engaged in an intense effort for science-based implementation of FQPA, which can work for farmers and consumers.

Individual species Quality Assurance (QA) programs: All livestock species have developed QA programs dealing with issues such as residue avoidance, biosecurity and animal handling. AFBF supports these efforts, encourages producers to participate in them and, in several cases, has been actively involved in the development of these programs. Widespread adoption of these programs by producers will improve our overall food safety system.

Research Priorities: AFBF routinely works with others in industry and at USDA to define research priorities to address food safety issues. We support a broad portfolio of research, including development and dissemination of new animal vaccines and diagnostics, as well as plant protection tools.

Support for an improved food safety system: Consumers want and need assurance of the safety of their food supply, but this is a multifaceted issue. We support the use of Hazard Analysis Critical Control Point (HACCP) programs for food inspection and as the basis for producer QA programs. We also support the use of processing technologies that can reduce risk. A final step is consumer awareness of their role in food handling and preparation to assure safety. If all of these pieces are in place, it improves the safety of our food supply.

Several specific questions were asked in the notice of the meetings on the food safety strategic plan. We will seek to address them individually:

1. Does the vision statement accurately depict an achievable food safety vision? What modifications, if any, would you make?

   The draft statement includes the sentence: "We work within a seamless food safety system that uses farm-to-table preventive strategies and integrated research, surveillance, inspection and enforcement." While a seamless system from farm to table seems desirable, the remainder of the statement links several items that need additional clarification. In reality our farm-to-table system is one based on integrated research and practical application of appropriate technology at all points in the system. This combination allows producers and processors to

deliver a safe, affordable food supply to consumers. Monitoring and surveillance are both important functions, for they provide the inspection system with the information needed to verify that the food safety system is working. When applied appropriately, they provide additional safeguards against contaminated food entering the commercial supply. Monitoring and surveillance are also critical in addressing the issues in the next sentence of the "Vision Statement," new and emerging threats. While enforcement is part of the regulatory system, it is really something that occurs after the fact. It does not in fact improve food safety, but rather is the penalty imposed if the system fails.

2. What are the barriers to pursing this vision? What gaps currently exist in the food safety system that impede the achievement of this vision?

   A better understanding of the causative agents, be they chemical or biological, is needed if we are to achieve the objectives included in the vision statement. Through additional research, we can learn what management; handling and/or treatment practices will reduce their level in the food supply. All segments of the food chain can use this information to improve food safety.

3. To make the vision a reality, what changes are needed for (a) government agencies at the Federal, State, and local level; (b) industry; (c) public health professionals; (d) consumers; and (e) others?

   Improved communications, ongoing dialogue and regular interaction are critical for any effort such as this to be successful. Anytime that you have a situation involving a regulator and the regulated parties, a certain amount of distrust is likely to exist. This has the potential to lead to an adversarial relationship. In this case, all parties in the system have the same objective, a safe and nutritious food supply. Communication will reinforce this and help to move the program forward successfully.

4. What should be the short-term goals and critical steps to realize this vision? What should be the long-term goals and steps?

   Development of a comprehensive research agenda that identifies knowledge gaps throughout the food safety system and funds projects to address them is critical. Ongoing, effective communications with all parties from the farm to consumption level is also important. This provides a way to provide information on new findings, facilitate adoption of proven technologies and identify additional knowledge gaps that may exist. It can also build the support needed to assure adequate funding for the entire system.

5. What is the best way to involve the public in development of a long-term food safety strategic plan? What additional steps besides public meetings would be beneficial?

   To be successful, the strategic plan must be based on sound science and good information. It is critical that this be obtained first and used as the basis for the plan. Consumer input on the implementation of the plan is appropriate, but in many cases it is likely more important to provide information about the food safety system, what it does and the rationale for these actions. The knowledge

base of most individuals, both producers and the public, is limited relative to the magnitude and scope of the system. Education will allow them to provide more useful input relative to the plan. Public meetings provide one way to do this, but it is likely limited. Working cooperatively with the Extension Service can expand the reach of these meetings. Information can certainly be provided on the Internet, with opportunities provided for feedback at the same time. Distribution of material, with reply cards, at grocery stores and as newspaper inserts may be other vehicles.

6. What are your comments on the conclusions and recommendations of the NAS report "Ensuring Safe Food from Production to Consumption"?

   AFBF strongly supports an effective and efficient food safety system that is based on science as is called for in both the conclusions and recommendations of the National Academy of Science report. Our policy also addresses several other areas covered in the report. We support measures to improve and streamline food inspection by having USDA serve as the sole federal agency responsible for food inspection and safety. In addition our policy states: "We support meat inspection that uses the Hazard Analysis and Critical Control Point (HACCP) process to address pathogen reduction that is based on scientific research, equitable treatment of all red meat and poultry products, and cooperation with industry. We urge USDA to adopt a program taking advantage of new techniques proven by research to be effective in reducing bacterial contamination. We support development of analytical methods for on-site detection of contaminants and other adulterants that may impact food safety. We recommend that meat and poultry inspected under state programs, which are equal to federal inspection and approved by USDA, be permitted to move in interstate commerce."

We appreciate the opportunity to provide this input on the food safety initiative strategic plan. We look forward to continuing to work with the agencies and all interested parties in the development and implementation of a more effective and efficient food safety system that addresses the needs and concerns of all participants from the farm to the table.

Sincerely;

Richard W. Newpher
Executive Director
Washington Office

References

1. Annelli, J., 1997. A national model for emergency animal health response. In Proceedings 21st Annual Meeting: 57-68. Livestock Conservation Institute. Bowling Green, KY.

2. McCapes, R., 1996. Preparedness--To stamp out foreign animal disease outbreaks. In Proceedings 80th Annual Meeting: 68-76. Livestock Conservation Institute. Bowling Green, KY.