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COMMENTS ON A STRATEGIC FEDERAL FOOD SAFETY PLAN IN RESPONSE TO FEDERAL REGISTER NOTICE OF AUGUST 27, 1998 REGARDING THE CREATION OF THE PRESIDENT'S FOOD SAFETY COUNCIL

Good morning. My name is Tom Montgomery and I am Director of Regulatory Affairs for the United Egg Producers (UEP) and the United Egg Association (UEA). UEP is a federation of regional cooperatives owned and operated by egg producer members. UEP's membership represents the ownership of about 80% of all the egg-type laying hens in the United States as well as most of the major breeding companies. UEA represents approximately 95% of all further processed eggs in the U.S., amounting to more than two billion pounds per year.

COMMENTS ON THE VISION STATEMENT

We in the egg industry applaud the proposed vision statement, but would caution that the opening sentence, "Consumers can be confident that food is safe..." may be somewhat misleading. Everyone, especially consumers, must understand that there always has been, and always will be, some risk associated with food. The statement should convey the concept that hazards are controlled. and risks minimized, but that an absolute guarantee of safety is still an ideal towards which we must continue to work.

The last line -- regarding everyone understanding and accepting their responsibilities -- is the most important, and should be the lead sentence of the vision statement because it is the key to reducing food- and waterborne illness. Teamwork is critical. Indeed, we either work together or fall together, and we want to take this opportunity to state unequivocally the intention of the egg industry to be a major player on the nation's food safety team.

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HOW TO STRUCTURE A STRATEGIC PLANNING PROCESS

We would like to offer a couple of insights on structuring a strategic planning process on food safety. First, a group of technical experts needs to identify the universe of known and suspected food- and waterborne hazards. Then, the relative risk of being exposed to those hazards should be determined. An advisory panel representing all affected groups should be formed to help the Food Safety Council initiate programs and set priorities based on the list developed by the technical experts.

ADDRESSING CHALLENGES AND MAKING THE BEST USE OF RESOURCES

1. The most important priority for the Federal food safety strategy is to focus on actual hazards as opposed to theoretical risks. Real, not hypothetical, numbers need to be used in making decisions regarding priorities. When funds are directed at theoretical risks it may be at the expense of someone who is violently ill and sick in bed. Any comprehensive food safety plan should ask, "Is this going to stop someone from getting ill?"

2. The ability to detect pathogens quickly and accurately will always be important in preventing food- and waterborne illnesses.

3. Food safety education should be a core component of public education.

4. A special outreach and education program should be developed for the food service industry.

5. Research funds are needed to develop the data that in turn will provide the tools for control of food- and waterborne illnesses. Funds are especially needed for control of pathogens at the production level.

6. Communication and partnership among different sectors needs to be improved. Communication of information, especially through the media, should be conducted accurately and responsibly.

7. Comprehensive and stable food- and waterborne surveillance systems are central to an effective food safety program.

8. Epidemiological investigations need to be accurate, complete and timely. They should be coordinated with microbiological data, environmental sampling and analyses of how the food was stored, prepared and served.

9. Funds need to be made available to state and local health programs for outbreak investigations, education and food service inspection.

10. Increasing the use of time and temperature indicators during transportation, storage and display at retail is a simple but effective way to enhance protection of the food supply.

11. Safe food is dependent upon having safe water.

POTENTIAL BARRIERS AND GAPS IN PURSUING THE VISION OF FOOD SAFETY

The biggest barriers to reducing the annual incidence of acute and chronic foodbome and waterborne illness are the lack of funds, commitment, priorities and incentives. There are numerous data gaps. Finally, a true cooperative working relationship must be established and maintained with the food industry because the biggest barrier to success is the absence of teamwork.

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