

Moving Towards a Public Health Systems Approach



Association for Food & Drug Officials (AFDO)

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FSMA Implementation

- Goal of FSMA is to move food safety system from a reactive to a preventive mode.
- FSMA's success depends on bringing about high rates of compliance.
- FDA is committed to educating before and while we regulate.
- FDA will engage and communicate to international community that is consistent with domestic efforts.



- Inspections by FDA cadre
 - o Preventive controls for human food (full requirements, domestic and foreign).
- Inspections by FDA and state
 - o Preventive controls for human food and animal food CGMPs.
- Record reviews of importers (FSVP).
- Inspections of Sprout Producers and Seed Suppliers.
- Other inspectional and sampling obligations as directed by Centers through directed assignments.





- Continue PC Human Food, Animal Food (CGMP), Sprouts, FSVP Record Reviews.
- Begin Sanitary Transportation Inspectional Components relative to large businesses (153 surveillance activities).
- Obtain stability from Program Alignment Initiative.
- Continue inspections as outlined in FDA's Food Safety Work Plan.



- Continue engagement with state regulatory partners to leverage resources.
- Continue training of food safety staff through internal webinars and outreach.

 Increase training of food safety staff in FDA's Regulators Training Course.



Intentional Adulteration

- Two Level Inspectional Approach
 - o High level review for required sections
 - o Trained investigators for full requirements
- Training and Assistance
 - o Online courses
 - o Webinars
 - o FSMA Technical Assistance Network (TAN)



Lessons Learned

- Clear communication of purpose of inspection.
- Industry not understanding ORA's policy on taking photographs.
- Longer inspection times and more participants on inspections, partly due to OJE.
- Consider feedback from industry, consumers, and state partners.
- Obtaining copies of Food Safety Plans and other documents as informational rather than supporting evidence of violation or significant observation.



What's Next?

- FDA's primary focus will continue to be on education, training and technical assistance to help companies comply with the new requirements.
- FDA recently issued draft guidance documents and will continue collaboration with regulated industry to ensure everyone understands and engages their respective roles in food safety.
- Inspection approach will focus on assessing the progress a company has made towards compliance and whether it is taking appropriate steps necessary to protect public health.
- Work with the food industry to create a culture of food safety, with procedures, processes, and practices that we know will achieve high rates of compliance with the rule and minimize the risk of foodborne illness.



Thank You

You

FDA FOOD SAFETY

MODERNIZATION ACT

THE FUTURE IS NOW