



Institute of Food Technologists

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IFT Comments on FDA's Human Foods Program

October 7, 2022

The Reagan-Udall Foundation, at the request of the FDA Commissioner, is conducting an external evaluation of the FDA's Human Foods Program. This evaluation was launched on September 8, 2022. According to the FDA and the Foundation the evaluation will "focus on structure/leadership, authorities, resources, and culture, expecting to provide recommendations that would equip FDA to carry out its regulatory responsibilities, strengthen its relationships with state and local governments, and secure the nation's food supply for the future." [Operational Evaluation of FDA's Human Foods Programs | Reagan-Udall Foundation \(reaganudall.org\)](https://reaganudall.org/Operational-Evaluation-of-FDA's-Human-Foods-Programs)

As part of this evaluation, Reagan-Udall held a public meeting on September 29-30, 2022 and is accepting public input against four questions (2000 characters maximum per questions):

- What are the greatest challenges facing the program(s)?
- What are the greatest strengths currently of the programs(s)?
- What recommendations for you have for improvement?
- Additional Comments

IFT submitted comments (listed below) for each of these questions.

What are the greatest challenges facing the program(s)?

The Institute of Food Technologists (IFT) appreciates the opportunity to provide comments to the FDA Human Foods Program Expert Panel reviewing what is working and what challenges exist and approaches to improve the program, focused on how the FDA structure/leadership, authority, resources and culture impact the program.

The U.S. has one of the world's safest food supplies yet there are ongoing food safety outbreaks and recalls. It is apparent that there are increasing challenges related to response timing on potential food safety issues as they arise.

With the incredibly broad, complex, and interrelated mission, FDA is constantly challenged to deliver on its current scope while actively evolving to anticipate future needs and challenges. Both in current and future evolutions of the organization, IFT believes it is important to focus on how best to deliver on the key pillars of FDA's mission. Organizational structure and leadership, funding levels and models, staffing levels and skill sets, stakeholder engagement mechanisms and timely, transparent communication are all important consideration areas.



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FDA is under-resourced to deliver on its mission especially with regards to proactively anticipating future food safety, resiliency, nutrition and security challenges.

FDA's mission intersects multiple federal, state, local and tribal programs necessitating a high level of interdepartmental coordination.

Looking to the future, IFT recommends the Expert Panel on FDA's Human Foods Program focus on Food Safety and Food Supply Resiliency and Food & Nutrition Security. Recommendations in each of these areas are identified in the comments below.

What are the greatest strengths currently of the program(s)?

The FDA has played a critical role in making the United States' food supply one of the safest in the world.

FDA recognizes that global food supply is rapidly changing, and that the FDA must evolve as well. Beginning with the creation and roll-out of the FSMA and continuing with The New Era of Smarter Food Safety, FDA is embracing a new technology-enabled food safety system.

FDA leadership recognizes the importance of internal and external stakeholder engagement and partnership.

The staff is highly capable and exhibits a high degree of professionalism. They are passionate about FDA's mission and public health.

The FDA's approach is correctly built on a foundation of science directing prioritization and decision-making.

What recommendations do you have for improvement?

Food Safety & Resiliency

IFT recommends FDA evaluate and increase resourcing levels, anticipating increased challenges and complexity, to help further improve the delivery of an even safer food supply for U.S. consumers. IFT would highlight the proactive assessment of potential food safety issues. IFT would propose that FDA broaden its view around food safety risk assessment to one of ongoing assessment across the entire food supply chain.

Going forward, IFT would encourage FDA to increase focus on what processes they might employ to be more proactive in identifying areas of concern, like toxic elements and allergens in the food



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supply. Specifically approaches that could provide FDA with an early warning system on new food safety risks and allow them to proactively respond to those risks. The recently created food traceability tools and forthcoming regulation are a positive example of a new approach used by the FDA to proactively minimize the risks and impacts of recalls in high risk foods.

FDA has a role to play in driving a greater level of resiliency, as seen during the Covid-19 pandemic and infant formula shortage. To improve resiliency, IFT recommends the FDA improve global harmonization of U.S. regulations on key components of our food supply. Improved harmonization of regulations ensures that foods can be delivered from other countries when resiliency issues arise. For example, improved harmonization of U.S. infant formula requirements with Codex Alimentarius regulations, or even a select group of partner countries, would enable the industry to adjust on its own without special regulatory exemptions. IFT believes an effort towards more U.S. harmonization with global regulations on critical food supply components through the auspices of Codex would provide such resiliency for both U.S. consumers and in reverse, for other nations.

Additional Comments

Inter-Agency Coordination

There are numerous examples of FDA working closely in concert with other federal agencies such as USDA and CDC on a variety of issues. Overall, IFT believes FDA works diligently to collaborate with these other departments as well as state, local and tribal partners for the benefit of the U.S. population. One area IFT believes FDA could enhance is in food and nutrition research. While FDA has limited research budget, its expertise is critical in driving decision making associated with food and nutrition research directions in other agencies (NSF, NIH, or USDA). IFT would recommend that FDA consider how it can improve its influence, particularly as it relates to nutrition & public health and food safety related research.

Food & Nutrition Security

The FDA's focus on improvements to consumer awareness through updating the Nutrition Facts Label and related 2020 launch of their national consumer education campaign are excellent steps to increasing consumer awareness. More needs to be done across the combined efforts of federal, state and local governments (schools) to address the challenges being faced.

FDA's work on developing a "healthy" definition and related symbol is another step on improving nutrition awareness but has been delayed in finalization. IFT would recommend that FDA seek to increase the timeliness of decisions on proposed rules and standards aimed at addressing significant nutrition and public health related concerns. Enhancing the speed of response to such



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rules and standards that have direct impact on nutrition and public health is one avenue FDA can use to increase U.S. public trust in the agency food related work.

If there are any questions regarding our input, please do not hesitate to contact Bryan Hitchcock (SVP Science, Policy and Learning) at bhitchcock@ift.org or John Ruff (CSTO) at jruff@ift.org.