



Institute of Food Technologists
525 W. Van Buren Street., Suite 1000
Chicago, IL 60607-3830 USA

+1.312.782.8424
+1.312.782.8348 Fax
ift.org

Date: September 25, 2024

Comments on the Development of an Enhanced Systematic Process for FDA's Post-Market Assessment of Chemicals in Food

Good afternoon. I am Anna Rosales, Senior Director of Nutrition and Government Affairs at the Institute of Food Technologists (IFT). Founded in 1939, IFT is a non-profit, scientific individual member institute with over 11,000 members. Our mission is to advance the science of food and its applications across the global food system to ensure sustainable, safe, and nutritious food for all. IFT appreciates the opportunity to provide input on the FDA's development of an enhanced systematic process for post-market assessment of chemicals in food.

While we're meeting today to discuss post-market assessment, it is essential to recognize that both pre- and post-market assessments should ensure end-to-end transparency in the approval of ingredients and foods. The FDA's updated systematic process for post-market assessment of chemicals in food should ensure transparency for all stakeholders, including in the process, prioritization, responses, and scientific references. Transparency is critical to building public trust and ensuring consumer confidence in the US food supply.

While transparency brings visibility to the processes and science, education and risk communications help the public interpret and understand the regulatory decisions. In the updated process the FDA must continue to be grounded in science, transparent in their risk assessments and analysis and clear in their communications to the public.

As innovation, disruption, climate, and public health concerns continue to grow, it is essential for FDA to build capacity for pre and post market assessment and to act in a timely manner. With limited resources the FDA should avoid duplication and delay by leveraging global processes and existing engagements with standards bodies across the world, for example Codex Alimentarius. This would simultaneously accelerate the responsiveness of post-market assessments, reduce duplicative work streams and help bring forward globally aligned food standards.

As FDA continues in the development of the post-market assessment process, IFT will continuously engage our membership and provide feedback to the FDA on building a better post-market assessment system for the future. IFT and our members are

committed to helping ensure we have an adequate, safe and nutritious food supply for everyone.

In closing, IFT believes it's imperative that FDA create a review system that incorporates the elements of science, timely communication, efficiency, risk communication, and transparency to help build consumers trust and building a more resilient food system for the future.