



720 South Colorado Blvd.
Suite 1000-N
Denver, Colorado 80246-1926
Phone (303) 756-9090
Fax (303) 691-9490
www.neha.org

Policy Statement: Uniform and Integrated Food Safety System Adoption

One in six Americans get sick from contaminated foods or beverages and 3,000 die each year (Centers for Disease Control and Prevention, 2017). The National Environmental Health Association (NEHA) recommends the adoption of current best practices in food safety by state, local, tribal, and territorial government agencies, along with industry food safety professionals. This adoption will ensure the safety of our nation's food supply by moving toward a fully integrated and uniform national food safety system. This system can be achieved by adopting, implementing, and fully funding proactive, science-based measures that have been shown to reduce the likelihood of foodborne illness. Among these, NEHA specifically recommends the following:

For State, Local, Tribal, and Territorial Government Agencies

- Enroll in the Voluntary National Retail Food Regulatory Program Standards if applicable to their responsibilities.
- Enroll in the Manufactured Food Regulatory Program Standards if applicable to their responsibilities.
- Adopt and implement the latest version of the Food and Drug Administration's (FDA) *Food Code* if applicable to their responsibilities.
- Conduct environmental assessments (e.g., root cause analysis) when investigating foodborne disease outbreaks or food contamination events.
- Report outbreak data to the Centers for Disease Control and Prevention's (CDC) National Outbreak Reporting System (NORS) and National Environmental Assessment Reporting System (NEARS).
- Increase state, local, tribal, and territorial government agency involvement in federal advisory workgroups dedicated to decreasing the occurrence of foodborne disease (e.g., Partnership for Food Protection, Conference for Food Protection, etc.).
- Increase educational outreach efforts to consumers and training outreach efforts to the food industry (ranging from frontline employees to management and executive staff) about how to prevent foodborne illness.
- Implement standardization of inspection techniques for retail food regulatory personnel based on the current version of the *Food Code* to ensure uniformity across jurisdictions.

- Use systems analysis concepts including hazard analysis and critical control point (HACCP) principles to control biological, chemical, and physical hazards in food through all stages of the farm-to-table food continuum and root cause analysis to evaluate the reasons for foodborne disease outbreaks or food contamination events.
- Agencies should selectively employ individuals with designations such as Registered Environmental Health Specialist/Registered Sanitarian (REHS/RS), Certified in Comprehensive Food Safety (CCFS), Certified Professional – Food Safety (CP-FS), Certified in Food Safety Supplier Audits (CFSSA), and others as appropriate.

For Industry Food Safety Professionals

- Adopt and apply concepts contained in the Food Safety Modernization Act.
- Develop food safety management systems that address specific hazards inherent to the operation using systems analysis concepts including HACCP principles to control biological, chemical, and physical hazards in food through all stages of the farm-to-table food chain and root cause analysis to evaluate the reasons for foodborne disease outbreaks or food contamination events.
- Implement active managerial control throughout the food supply chain using FDA guidelines.
- Provide initial and ongoing food safety training to all food industry staff.
- Implement a policy to ensure that ill food service employees are required to stay home when infectious with diseases that can be transmitted through food. This practice will reduce the likelihood of disease transmission from ill employees to consumers. One option is to provide paid sick leave.

Background

Currently, the U.S. food supply is overseen by a patchwork of state, local, tribal, territorial, and federal rules and regulations. As these rules and regulations aren't uniform and applied equally, a fragmented system of food safety has been fostered throughout the nation making our food safety system less efficient and effective, and possibly less safe.

According to CDC, it is estimated that approximately 48 million Americans become sick from a domestically acquired foodborne illness annually. Of these, 128,000 are hospitalized and 3,000 die (Scallan, Griffin, Angulo, Tauxe, & Hoekstra, 2011; Scallan, Hoekstra, et al., 2011). The economic impact of foodborne illness has been estimated at \$152 billion annually for direct medical care and loss of quality of life (Scharff, 2010). This figure is likely an underestimate of the total cost as it fails to account for other societal costs, such as the costs to industry for loss of reputation and food recalls.

In an effort to increase the efficiency, effectiveness, and safety of the U.S. food supply, NEHA recommends the adoption, implementation, and funding of current best practices in food safety by state, local, tribal, and territorial government agencies and industry food safety professionals. These organizations must also work together to ensure an integrated food safety system.

Justification

The voluntary standards (either retail or manufactured food) provide a framework for self-assessment of regulatory programs. Along with the self-assessment, these standards encourage programs to meet a minimum standard and encourage proactive development of processes to exceed the minimums and to ultimately prevent foodborne illness.

FDA's *Food Code* is revised on a 4-year cycle (with a supplement issued on the intervening 2-year cycle). The *Food Code* is designed to reflect the latest scientific principles that are arrived at through a consensus approach with the Conference for Food Protection. This mechanism allows for the input of regulatory, academic, industry, and consumer groups to be incorporated into the changes.

Environmental assessments or other root cause analysis techniques are critical when investigating a foodborne outbreak. These methodologies extend beyond code compliance and examine the factors and antecedents that allowed for the outbreak to occur.

Reporting of data to NORS and NEARS provides important information on the foods, establishment types, and etiologic agents that are causing illness. Monitoring of this information provides data on changes in foodborne illness patterns and allows refocusing of resources when necessary. The reporting of environmental assessment data allows for an understanding of what are the system failures in the food establishment that led to the food becoming contaminated. By understanding what these factors are, appropriate intervention strategies can be developed to minimize their effect in the future.

Training of food service personnel has been viewed as a key intervention strategy in preventing foodborne illness. At the retail food level, the effect of having a certified food protection manager has been consistently demonstrated with improved inspection scores (Cotterchio, Gunn, Coffill, Tormey, & Barry, 1998), lower rates of critical violations (Cates et al., 2009), and the provision of a protective effect for foodborne outbreaks (Hedberg et al., 2006). At the regulatory level, credentialed professionals represent best practices. They possess the knowledge, skills, and abilities to anticipate, recognize, and manage foodborne illness risk factors. Agencies should selectively employ individuals with such designations as outlined in the recommendations.

Standardization of approach and uniformity of regulations provides a clear and consistent set of expectations for food manufacturers and food establishments with locations in multiple jurisdictions. This standardization can also serve to increase consumer confidence in the food supply as all involved parties are held to the same standard.

Developing food safety management systems using a systematic approach allows for food manufacturers and food establishments to develop a customized approach that is specific to their operation, processes, and food products. The *Food Code* requirements serve to provide this type of risk characterization for retail food establishments.

Sick food workers have long been identified as a source of contamination in the food environment. The *Food Code* addresses this at the retail level in §2-201 (U.S. Department of Health and Human Services, 2013). Even with these regulations, food workers continue to serve as a source for disease transmission at both retail and manufacturing levels (Carpenter et al., 2013; Malek et al., 2009).

An integrated food safety system (IFSS) represents a seamless partnership among federal, state, local, territorial, and tribal agencies (strategic partners) to achieve the public health goal of a safer food supply, as well as solicits input and support from stakeholders.

The seamless operation of IFSS strategic partners will

- plan and prioritize work to coordinate resources;
- use foodborne illness outbreak data to inform the development of evidence-based food safety policies and programs, and criteria to evaluate their effectiveness;
- implement efficient, prevention-focused, risk-based inspections and sample collections;
- share data among strategic partners; and
- promote the use of compliance and enforcement tools for achieving compliance with food safety laws and regulations.

An IFSS strives to leverage the participation, coordination, resources, and authorities of all regulatory partners to protect the food supply.

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NEHA Food Safety Policy Statement Committee Members

Eric Bradley, MPH, REHS, CP-FS, DAAS, Environmental Health Coordinator, Scott County (IA) Health Department

Shane Green, Food Service Consultant, Food & Dairy Division, Michigan Department of Agriculture

Jack Guzewich, Consultant

Donald Howell, Director of Operations Services and Quality Assurance, Huddle House Restaurants

Adam Kramer, MPH, ScD, RS, CFS, U.S. Public Health Service, Environmental Health Services Branch, Centers for Disease Control and Prevention

Jeff Tarrant, CDR, U.S. Public Health Service

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