



CENTER FOR FOOD SAFETY

Food Safety Principles July 2009

One of the greatest challenges facing our nation today is the restoration of a safe and healthy food supply. To achieve this urgently needed change and to restore faith in our government's ability to ensure safe food requires a substantial restructuring of how our government regulates food production and food safety, from the farm to fork.

The Basics

A safe, secure, and sustainable food system:

- sustains and enhances the well-being of people, wild nature, the economy, and society as a whole
- ensures a stable food supply for current and future generations.
- supports universal access to affordable, fresh, healthy, and diverse foods.
- fosters and protects food safety throughout the entire lifecycle of food products, from the farm to the fork
- safeguards farm livelihoods, agriculture communities, worker health and safety, the natural environment and its inhabitants, and the ethical treatment of animals.
- embraces *prevention* as the foundation of food safety oversight and regulation and the *Precautionary Principle* as the underling approach that supports government action to remove potential threats of harm to our nation's food supply, even in the absence of a direct cause and effect relationship.

The Center for Food Safety has developed the following list of *Food Safety Principles* as its contribution to proposed food safety policies, laws and regulations being considered by Congress and the Obama Administration.

1. Government Oversight, Regulation and Enforcement

Protection of our nation's food from deliberate and accidental contamination must become a government priority. This necessitates the creation of a cabinet level Food Safety Administration (FSA) with sufficient regulatory authority to ensure safe food across the supply chain. The creation of an FSA would streamline food safety responsibilities by consolidating within one agency the government's food safety responsibilities, currently spread across thirteen or more agencies. We recommend that the following core principles underpin the operations of the FSA:

- a. Government access to safety records of all food producers without regard to claims of confidential business information.

- b. Unrestricted government authority to mandate nationwide food product recalls, in coordination with existing state and local government programs and regulatory authorities.
- c. Mandatory and routine inspections of food producers and processing facilities by trained, government personnel or their deputized agents.
- d. Required reporting of any known or suspected food safety hazards to food safety authorities.
- e. Strict and timely enforcement of food safety laws and regulations.
- f. Identification and stringent regulation of the greatest food safety threats across the supply chain, taking into account the scale and hazard of different types of food production systems.
- g. Mandatory food tracking system to facilitate the government's ability to trace and rectify potential food safety problems.
- h. Widespread food industry education about the potential sources of food-borne contamination and the appropriate measures to take to prevent contamination.
- i. Routine product safety tests to provide early warning about the existence of potential food contaminants and to facilitate the early removal of a potential hazard from the supply chain before it becomes a larger public health problem.
- j. Consistency of food safety standards with conservation practices and policies, established by federal natural resource conservation, wildlife and habitat conservation, and, watershed management programs, and the Organic Foods Production Act (OFPA).
- k. Free flow of direct farmer-to-consumer commerce.
- l. Recognition that one-size-fits all approach to food safety is not workable and that food safety policies and standards must address the varying conditions of food producers across the country and the risks they pose, from diverse, small-scale and family operations to large-scale, industrial producers.

2. Food Product Transparency, Public Participation, and Accountability

Transparency across the food supply chain enhances the government's ability to track food contamination back to its source, remove contaminated food from the marketplace, and hold companies accountable. Public access to information on food safety and food policies facilitates meaningful public participation in government decision-making. Food labeling allows the public to make informed food choices to nurture and protect the health of their families. We recommend that the following core principles underpin a transparent food system:

- a. Complete public access to information generated by federal, state, and local government, and by private parties, regarding sources of food-borne illness and the safety of the food system.
- b. Full disclosure on product food labels of all ingredients contained in food products, the identification of ingredients produced offshore, and an acknowledgement of the use of novel food production and preservation technologies.
- c. Public participation incorporated into the decision-making process of all food safety legislation and regulation.
- d. Citizen suit provisions incorporated into all new food safety laws so that citizens can pursue infractions of food safety laws and lax enforcement through the courts when the government fails to act.
- e. Robust whistle blower protections to ensure a transparent food safety system and to protect those who endeavor to expose food safety infractions when the government fails to take appropriate action.
- f. Corporate accountability and liability for hazards that result from their participation in the food supply chain.

3. New Technologies and Novel Foods Assessments and Approvals

The *Precautionary Principle* must be applied with special force during assessments of new food technologies and novel foods such as genetically engineered animals and crops, cloned animals, irradiated food, and foods and food packaging produced with nanotechnology, etc. We recommend that the following core principles underpin the assessment and approval of all new technologies and novel foods:

- a. New technologies and novel foods identification and assessment system to identify data gaps and to facilitate FSA evaluation of new materials, technologies, products, and processes using lifecycle
- b. Interdisciplinary Advisory Board evaluation of novel foods and new technologies to assess the wider societal and socioeconomic implications of allowing the introduction of these foods and technologies into the marketplace.
- c. Rigorous pre-market evaluation of the potential health, environmental, and economic impacts of new food technologies using both sound science¹ and ethics to underscore their food safety assessment.
- d. DNA tracking system for genetically engineered animals, cloned animals, and their offspring, due to both the unique and uncertain hazards they pose to food safety and the widespread public opposition to their introduction into the food supply.

¹ See Presidential Memorandum for the Heads of Executive Departments and Agencies, Scientific Integrity, 74 Fed. Reg. 10671-72 (March 9, 2009).