

August 8, 2022

Dr. Robert Califf
Commissioner
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002

Dear Commissioner Califf:

Our coalition thanks both you and Principal Deputy Commissioner Dr. Janet Woodcock for meeting with us on June 28, 2022 and being so generous with your time. As stated previously, this broad and diverse coalition in support of reforming FDA's food program includes entities that do not always align on issues. However, we agree that the FDA should identify a food safety expert to serve as Deputy Commissioner to lead a unified foods program, with direct line authority over all major program components, including the Office of Food Policy and Emergency Response, Center for Food Safety and Applied Nutrition, and relevant parts of the Center for Veterinary Medicine (CVM) and Office of Regulatory Affairs, and that this action be completed with urgency. We want and need an FDA food program that is structured, governed and funded for success, and we stand ready to assist the agency to meet these goals. We sincerely hope that you found the variety of perspectives presented during the meeting useful.

The coalition applauds FDA for contracting with an external, independent third party, the Reagan-Udall Foundation, to perform a top to bottom review of the agency's foods programs. We are hopeful that this review will be conducted by a panel that includes food safety and nutrition experts who can provide an objective view. The outcome should include substantive and actionable recommendations that allow FDA's food program to operate closer to the speed of business, leverage collaboration and partnerships, and to assure companies can innovate and thrive while protecting public health.

We are concerned, however, that the agency's announcement that it would conduct an evaluation of key activities to strengthen food program operations did not include CVM. The federal definition of "food" has included food for animals since its inception into law in 1906. Therefore, we do not agree with this omission in a top to bottom review of FDA's food program. With the exception of the regulation of drugs for pets, every element of CVM's program relates to the food system and food safety. This includes the drug approval program for food animals, which must ensure the safety of drug residues in human food and the regulation of animal feed, which can affect human and animal health. The Food Safety Modernization Act purposely mandated prevention-oriented food safety standards for both human and animal food and recognized both as components of the food program at FDA. Moreover, FDA's state partners play a large role in animal feed safety and should be part of an integrated FDA food safety program. We urge the agency to include CVM in its review and include the food-related components of CVM in an integrated FDA food program under a single, accountable and responsible expert leader.

We appreciate FDA initiating an independent review of its food program by an expert panel and

look forward to substantive recommendations coming out of this effort.

Sincerely,

Consumer/Public Health Groups

Antibiotic Resistance Action Center (GWU)
Center for Food Safety
Center for Science in the Public Interest
Consumer Federation of America
Consumer Reports
Environmental Defense Fund
Environmental Working Group
Friends of the Earth
Healthy Babies Bright Futures
Johns Hopkins Center for a Livable Future
Natural Resources Defense Council
STOP Foodborne Illness

Industry Groups

American Bakers Association
American Frozen Food Institute
Consumer Brands Association
Corn Refiners Association
FMI - The Food Industry Association
Global Cold Chain Alliance
International Fresh Produce Association
National Association of Chemical Distributors
National Confectioners Association
North American Millers' Association
Western Growers

State and Local Government

Association of Food and Drug Officials