Consumer Federation of America

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Before the
Committee on Agriculture
U.S. House of Representatives
Washington, DC

April 2, 2009

Good morning Chairman Peterson, Ranking Member Lucas and members of the Committee. My name is Carol Tucker-Foreman. I am Distinguished Fellow in the Food Policy Institute at Consumer Federation of America. CFA is a non-profit association of over 300 local, state and national organizations, representing a combined membership of over 50 million American consumers. Since 1968 we have conducted research, provided educational materials and engaged in advocacy on behalf of consumers on a range of issues including banking and financial services, food and agriculture, and product safety. Our positions and priorities are set by vote of representatives of our member groups.

From 1977-81 I served as assistant secretary of agriculture. My responsibilities included oversight of the nation's meat, poultry and egg inspection and food assistance programs. In 1986 I founded the Safe Food Coalition which includes foodborne illness victims, consumer and public health organizations and a trade union to seek improvements in U.S. government food safety programs, especially meat and poultry inspection. I am a member of the Food and Drug Administration Food Advisory Committee, the National Advisory Committee on Meat and Poultry Inspection and USDA's Advisory Committee on Agricultural Biotechnology.

No hearing you hold this year will be more important to American consumers, to the food industry, or to the people who produce our food. Americans are acutely aware of the crisis in our food safety system. We have experienced recurring outbreaks over the past few years, including a new one involving pistachio nuts this week.

Consumers are not the only ones who fear our food safety system is failing. In January 2007, the Government Accountability Office declared the federal food safety programs at "high risk" of failure. In November 2008, the GAO named food safety as one of 13 topics most in need of urgent action by the new Administration and the new Congress.

Each spring the Centers of Disease Control and Prevention (CDC) reports on levels of foodborne illness. The April 2007 report was sobering. The agency announced that there has been almost no reduction in foodborne illness in recent years. In 2007, the *Salmonella* illness rate was more than double the national goal. There has been no real decline in the rate of *E. coli* illness since the FoodNet tracking began. There has been no decline in *Campylobacter* illnesses since 2002 and the *Listeria* rate was as high in 2007 as it was in 2004.[1] Unless something changes quickly and radically, the nation will not meet the *Healthy People 2010* national objectives for reducing foodborne illness.

At a time when everyone is feeling the pinch of severe recession, the economic costs of foodborne illness continue to rise. Dr. Tanya Roberts, formerly of USDA's Economic Research Service, estimates that illnesses caused by all foodborne pathogens cost the nation $1.4 trillion each year in medical expenses, lost productivity and wages.[2]

Numbers as large as these have a certain unreality about them. They may seem unconnected to what goes on in our daily lives. It is important to remember the personal suffering and loss that are involved but not factored into the trillion dollar loss. There is no calculation for physical suffering or the pain when a family loses a young child or beloved grandparent to a foodborne disease.

I urge you to remember that we are talking about individual lives. Over the past five years, thousands of people have, literally, been poisoned by common, everyday foods that we serve at the family dinner table--spinach, lettuce, tomatoes, peppers and peanut products.

In addition, we have been threatened by high levels of drug residues and toxic chemicals in fish and dairy products imported from China.

The largest foodborne disease outbreak was the most recent. Almost 700 people got sick and 9 deaths have been tied to consumption of a variety of foods that contained peanut

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[1] Centers for Disease Control and Prevention, "Preliminary FoodNet Data on the Incidence of Infection with Pathogens Transmitted Commonly Through Food—10 States, 2007." *MMWR* 57(14): 366-370, April 11, 2008.

[2] Roberts T, "Estimates of the Societal Costs of U.S. Food-Borne Illness." *American Journal of Agricultural Economics*, Vol. 89, Issue 5, pp. 1183-1188, December 2007.

products contaminated with *Salmonella* Typhimurium. Starting early this year, 2,100 products from more than 200 companies were recalled.

This was the second major *Salmonella* contamination, outbreak and recall of peanut butter products in two years. Previously, FDA had viewed peanut butter and related products as "low-risk" foods, not particularly susceptible to contamination. That illusion should have ended with the outbreak of *Salmonella* illnesses traced to peanut products produced by Con-Agra at a plant a short distance away from the one involved in the most recent outbreak. However, FDA made no substantive changes in order to effectively prevent another peanut related outbreak.

That next outbreak wasn't long in coming. Between April and June 2008, more than 1,300 people in 43 states, the District of Columbia and Canada were infected by *Salmonella* Saintpaul, an unusual strain of the bacterium. The outbreak, originally thought to have been caused by tomatoes, was ultimately traced to Serrano and jalapeno peppers imported from Mexico.

Foodborne illness is not something that happens just to other people. Citizens of 46 states were hit by the Peanut Corporation of America outbreak. The victims included 100 Ohioans; 76 Californians; 43 Minnesotans. The 2008 *Salmonella* Saintpaul outbreak traced to contaminated Serrano and jalapeno peppers hit 559 Texans, 120 people in Illinois, 42 in Georgia, 59 in Arizona. This month 84 Nebraskans, 27 Iowans, and 5 Kansans and South Dakotans were among the victims of a *Salmonella* Saintpaul outbreak traced to eating contaminated fresh sprouts.

These people are your friends, neighbors and constituents. They and all the rest of us need your help and your leadership to rewrite the archaic laws and organizational structure that govern our food safety system.

The outbreaks I've discussed were the result of poor sanitation or mishandling at some point in the food chain. None resulted from consumer mishandling, although a great deal of foodborne illness can be traced to consumers' failure to handle foods carefully.

Thankfully, Americans have not been subjected to illnesses caused by intentional efforts to poison our food. We cannot assume, however, that that will never happen. Former Secretary of HHS Tommy Thompson, as he left office, noted that we are unprepared to address attacks on our food supply and urged that the nation begin to address this.

The continuing series of foodborne illness outbreaks have seriously shaken consumer confidence in the safety of our food supply.

•After the Peanut Corporation of America outbreak, the University of Minnesota's Food Industry Center reported that only 22.5% of consumers were confident the food supply is safer today than it was a year ago.[3]

•A Consumers Union study conducted last November, found that 48 percent of those polled said their confidence in the food supply had declined.[4]

• Last spring, the United Fresh Produce Association conducted a survey of consumer attitudes toward produce safety. In April 46% of consumers were concerned about produce safety. Four months later, the tomato/pepper *Salmonella* Saintpaul outbreak had occurred and the number of people concerned about produce safety had risen substantially. 54% were concerned about produce safety and 56% were concerned about salad mix.

That lack of confidence is bad for the food business and for food producers. The CEO of Kellogg's told the House Energy & Commerce Committee that the PCA recall cost the company $65-70 million.[5] Although no major brands of peanut butter sold at retail were involved in the PCA outbreak, sales of those products plunged after the outbreak became known.

Foodborne illness outbreaks are also bad for farmers who grow the crops implicated. Florida tomato farmers were devastated by the connection of their product to the *Salmonella* Saintpaul outbreak that came at the height of their growing season. Spinach and lettuce farmers experienced a drop in demand after their products were implicated in outbreaks. USDA recently announced that farmers will likely cut their production of peanuts by about 27 percent this year as a result of smaller contracts from buyers.[6] It is true that these markets often come back but the lost sales and lost income are not recoverable.

We can expect that outbreaks like these will continue, threatening the health of consumers and the businesses of food processors and farmers until Congress acts to address the archaic laws, confused organizational structure and underfunded food safety system.

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[3] C*onsumer Confidence in Food Safety Plunges in Wake of Peanut Butter Contamination, University of MN Study Finds,* UMN News, Feb. 23, 2009).

[4] Food-Labeling Poll 2008, Consumer Reports National Research Center, NRC #2008. 18, Nov. 11, 2008

[5] Statement of David Mackay, President & CEO, Kellogg Company, before the House Committee on Oversight and Investigations, "The Salmonella Outbreak: The Role of Industry in Protecting the Nation's Food Supply." U.S. House of Representatives, March 19, 2009.

[6] Rampton R, "US peanut plantings to drop 27 percent after peanut scare." *Reuters*, March 31, 2009.

The Source of the Problem

The U. S. food safety system is broken. The Government Accountability Office (GAO) has identified 15 agencies involved in administering 30 different federal laws that touch on food safety.

The two agencies with primary responsibility for protecting our food are the Food Safety and Inspection Service (FSIS), located in the Department of Agriculture (USDA) and the Food and Drug Administration (FDA) located in the Department of Health and Human Services (HHS). The primary laws governing food safety were written over 100 years ago.[7] The most recent major food amendments to the Food Drug and Cosmetic Act were passed 70 years ago. The last rewrite of the Meat Inspection Act was over 50 years ago. The world we live in and the way we produce, process and consume food have all changed radically but the laws remain the same

We Need A 21st Century Food Safety System

Consumer Federation of America and other consumer and public health organizations have called on Congress and the President for over 20 years to undertake a comprehensive revision and modernization of food safety laws and to combine all food safety activities in an independent food safety agency.

Both the GAO and a number of expert committees have examined the problems with the food safety system. The GAO has produced a number of studies, beginning in the mid-1990s, documenting the pressing need to modernize food safety laws and organization.[8]

In 1998, the National Academy of Sciences recommended that Congress modernize food safety laws and overhaul the federal government's food safety structure to meet current needs.[9] My colleague Mike Taylor served on that committee and has taken a lead role in updating some of its recommendations. In 2003 another NAS committee recommended that Congress give the agencies the authority to set and enforce microbiological criteria.[10]

Starting in the 1990s, Senator Richard Durbin and Representatives Rosa DeLauro, Frank Pallone and John Dingell introduced bills that gave FDA enhanced authority to prevent

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[7] The primary legal authorities for the FDA are the Federal Food Drug and Cosmetic Act, as amended (21U.S.C. 301 et.seq.); the Public Health Service Act, as amended (42 U.S.C., et.seq.) and the Egg Products Inspection Act, as amended (21 U.S.C., 1031 et.seq.) Governing authorities for FSIS are the Federal Meat Inspection Act of 1906, as amended (21 U.S.C. 601 et.seq.) the Poultry Products Inspection Act of 1957, as amended (21 U.S.C. 451 et.seq. and the Egg Products Inspection Act, as amended (21 U.S.C. 1031 et.seq.)

[8] Numerous reports available at U.S. Government Accountability Office website, http://gao.gov/.

[9] Institute of Medicine, National Research Council *Ensuring Safe Food from Production to Consumption,*1998.

[10] Institute of Medicine, National Research Council *Scientific Criteria to Ensure Safe Food,* 2003.

foodborne illness. Senator Durbin and representative DeLauro also introduced legislation to create an independent single food safety agency.

In the 111th Congress, nearly a dozen bills have been introduced so far, including H.R. 1332, The Safe FEAST Act sponsored by Rep. Costa and several members of this committee. All the bills embrace at least some of the elements identified by the NAS and GAO as necessary for securing the safety of both domestic and imported foods.

Some key elements of what is required for an effective modern food safety system appear in the recommendations of almost all of the outside panels and most are reflected to some degree in all the bills introduced in Congress this year.

Frequently Noted Elements of An Adequate Food Safety System

1. Create a system that addresses risks of foodborne illness that may arise anywhere along the food chain, from farm to fork and into the consumer's mouth. Microbiological pathogens can enter food at any point.
2. Make prevention the focal point of the new system.
3. Require food companies to develop and implement controls to assure that the food they sell is safe.
4. Require food safety agencies to establish and enforce microbial performance standards that will reduce pathogens to a minimum and assure an acceptable level of public health protection.
5. Protect the integrity of the system and the food supply by providing for comprehensive enforcement. This should include: regular oversight (inspection) conducted by public officials and based on the risk presented by the product; require sampling and testing for pathogens and reporting; assure food safety officials have access to company food safety records; and authorize agencies to require recalls of contaminated food.
6. Ensure that the food we import is as safe as that produced and processed here.
7. Provide for research capacity to develop the best means to address current and emerging pathogens.
8. Assure adequate financial and staff resources in an institutional setting that provides the leadership, visibility, and status needed to support the program.

Comparison of How Existing Food Safety Authorities and Organizations Address the Elements of a Modern Food Safety Program

As a starting point for thinking about what kind of statutory changes may be necessary to build the kind of system envisioned in these elements, it is useful to examine the basic legal mandates of the two agencies and compare how they address the elements under current law.

The Food and Drug Administration has responsibility for ensuring that all domestic and imported foods except meat, poultry, processed eggs and, since passage of the 2008 farm bill, farm-raised catfish, are safe, nutritious, wholesome and accurately labeled. Domestically, FDA has responsibility for some 44,000 food processors, 114,000 food retailers and 935,000 restaurants.

The Food Safety and Inspection Service is responsible for the safety, wholesomeness and proper labeling of most domestic and imported meat and poultry and their products sold for human consumption. It regulates over 6,000 domestic meat, poultry plants and egg plants.

1. System Authority Should Extend from Farm to Fork

FDA-has some ability to regulate on-farm activities. However, this ability is limited and according to the Congressional Research Service, FDA's general approach has been not to impose mandatory on-farm safety standards or inspections of agricultural facilities but to rely on farmers' adoption of good agricultural practices to reduce hazards prior to harvest. FDA issues good agricultural practices as guidance, not regulations; they are advisory and not legally enforceable.[11]

FSIS-authority begins at the door of the slaughterhouse. Has no on-farm authority.

2. System Designed to Prevent Contamination and Foodborne Illness

Prevention is a core public health value. It is always better to prevent a problem than try to resolve it. The language in the FFDCA and the FMIA and PPIA is quite similar but the results are quite different.

FDA—system is reactive. The FFDCA contains no specific direction to the agency to prevent food contamination or foodborne illness. FDA's primary food safety authority is the power to seize adulterated or misbranded food. The burden is on FDA to prove a product is adulterated or mislabeled before it can act. To justify a product seizure FDA must have laboratory tests to show that the product is adulterated or misbranded before it acts. As a result, FDA often doesn't act at all until there are confirmed reports of illness or death.

FSIS—system is preventive. Meat and poultry processors must, in effect, prove to a USDA inspector that the plant's product is safe and accurately labeled. Products can't

[11] Congressional Research Service, RS22600, *The Federal Food Safety System: A Primer,* Geoffrey S. Becker, March 3, 2009.

be entered into commerce until a USDA inspector applies the "mark of inspection." This means that trained federal inspectors paid by public funds must take an affirmative action before food products can leave the plant.

3. System Requires Companies to Take Responsibility for Safety of Their Products

FDA- The FFDCA does not give FDA specific authority to require companies to establish or follow preventive controls. FDA's primary method of operation is to rely on each company's self-interest in producing safe products, and to work with the industry to encourage improved production practices.[12] FDA has required HACCP systems in seafood and fresh juices. A HACCP plan for shell eggs has been in process for several years.

Virtually all large processors have some form of process control, many with higher standards than the government would require. Majority of other facilities do not have formal process controls. Very few farms have adopted formal systems for avoiding food safety problems.

FDA's failure to require food companies to institute preventive process controls was partially responsible for the Peanut Corporation of America's ability to hide their activity. Since PCA wasn't required to show the FDA or Georgia State inspectors their plans, inspection was just a quick visual review of what the plant looked like at a given moment.

FSIS-Since 2000, FSIS has required all meat and poultry companies to adopt HACCP systems and sanitary operating plans. A dozen years into HACCP, many companies still have not identified any critical control points or adopted meaningful HACCP programs. Lack of specific statutory authorization for HACCP and sanitation procedures prevents full benefits of HACCP. The agency cannot permanently withdraw inspection from a plant that fails to follow its HACCP and sanitation plans.

One of the most glaring weaknesses of the FSIS system is that, unable to withdraw inspection from plants that fail to adopt effective HACCP plans, FSIS then tries to "help" them comply, contrary to the notion that this is the "company's" plan. This requires additional agency resources to assist a company that is unable or unwilling to develop an effective HACCP plan. It also means that FSIS is caught between the old inspection system in which it often was the only quality control in the plant, and the new system where companies are supposed to take ownership of their food safety plans.

[12] Ibid.

4. System Requires Agencies to Establish and Enforce Pathogen Reduction Performance Standards

FDA--has no specific mandate or authority to establish pathogen reduction performance standards that companies must meet. FDA has adopted some performance criteria and standards. Government needs to establish a minimum acceptable level of public health protection. If food companies know what the standard is most will immediately set their own systems to meet or exceed the standard.

FSIS—has no specific authority to establish or apply performance standards, nor to withdraw inspection from companies that fail to meet them. But agency has instituted standards for generic E. coli and *Salmonella* on animal and poultry carcasses. Lack of specific authority to set and enforce these standards limits effectiveness. Enforcement of performance standards is a key public health element but courts have limited FSIS's enforcement. The agency does have authority to set a zero tolerance standard for *E. coli* O157:H7 in ground beef and trim, and zero tolerance for *Listeria* and *Salmonella* in ready-to-eat products.

5. System Provides for Adequate Enforcement, applied according to the risk presented by the product. Must include regular oversight (inspection) by public officials to assure companies are complying with standards; microbial testing and reporting; access to records; mandatory recall. Food safety system integrity depends upon adequate enforcement authority.

FDA-

*Inspection--C*onsistent with its reactive approach to food safety, FDA makes little investment in preventive inspections to assure a company is complying with the law. FDA contracts with state governments to conduct inspection of some facilities and works with states to set safety standards for food establishments.[13] Common practice is to rely on non-FDA sources for information that a particular facility may be in need of additional inspection or to act after having cause to believe a facility is connected to an outbreak of foodborne illness.[14]

Risk-Based Inspection-Current effort to devise mechanism to assign inspector based on risk. Work plan and budget say FDA inspects "high-risk" facilities more often. Many plants are inspected only once in a decade. FDA has no organized system for determining level of risk and applying resources accordingly but has begun analysis of relative risk, working with outside groups, including the Institute of Food Technologists.

[13] Much of the information on the basic information about FDA and FSIS authorities, jurisdiction and funding is from Congressional Research Service paper, 7-5700.*The Federal Food Safety System: A Primer,* by Geoffrey S. Becker, March 3, 2009.

[14] Food Safety Primer.

Government Access to Company Records-FDA does not have authority to require access to plant records; does not require companies to keep records and provide FDA information on source of material or destination of products;

Traceback-no authority or capacity to track products back to source;

Recall-no authority to require recall. Recalls are voluntary but FDA, with a court order, can seize a product that is adulterated.

FSIS-

Inspection-law requires continuous inspection in slaughter and processing of animals and birds. For animals, FSIS must inspect before slaughter; individual post-mortem carcass inspection for red meat animals and poultry. At least daily visit to every processing plant.

Risk-Based Inspection-Inspection resources not applied according to risk. Agency has been trying to devise a risk-ranking system but has been unable to produce one that meets scientific criteria. Statutory requirement to inspect every poultry carcass is not risk-based, but FSIS has no alternative given law and lack of data to support another system.

Consumer groups oppose attempts to alter system without rewriting underlying law to include better enforcement tools and more science. Requirement to visit every processing plant daily is also not risk-based but agency has failed to offer a valid alternative or to persuade Congress to change the law. FSIS has trouble meeting responsibility to visit every processing plant at least daily. In addition, many high risk meat grinding operations are visited only once daily when a more intensive regime would offer more protection for consumers. Plants that are not high risk often have same level of inspection.

Government Access to Company Records-most records must be made available on request of inspector.

Traceback-each inspected plant is identified by a plant number which follows product making it easier to identify products and recall them. Products packaged for final sale in a USDA inspected plant will have the plant number on the final package so that consumers can identify a recalled product. FSIS has no authority to track product back to the farm of origin. No way to determine if some ranches and feed lots have cattle that consistently turns up with high levels of *E. coli* contamination.

Recall-no authority to require plant to recall products. Recalls are voluntary on part of plant.

6. System Ensures Safety of Imported Foods

FDA-countries wishing to export to the US may do so after filing registration forms with the agency as required by the Bioterrorism Act.

As of Jan. 2009, 367,600 facilities in 180 foreign countries were registered to export to the U.S.[15] The exporting country is not required to demonstrate its food safety system is equivalent to the U.S. system.

FDA inspects less than one percent of all the food that enters the country. Imported foods are responsible for a large proportion of foodborne illnesses that arise from FDA-regulated products. In 2006 the FDA stated, "to the best of our knowledge, approximately half of the foods that have been associated with foodborne illness have been imported."[16]

In June 2007, FDA detained imports of farm-raised seafood from China because of the possibility they were contaminated with unapproved drug residues. In late 2008, FDA held up further imports of dairy products from China until importers could prove they were not contaminated with melamine, a toxic chemical intentionally added to milk to increased measured protein levels. The same chemical was implicated in the recall of large amounts of pet food and in infant formula in China.

FSIS- no country can export meat or poultry to the U.S. until FSIS has certified that the exporting country has an inspection system that is equivalent to the U.S. In addition, each foreign plant that wants to export to the U. S. must be found to be operating in a manner that is equivalent to that required of U.S. plants.

FSIS inspectors are present at all points of import into the country to carry out statistical sampling and testing to assure the safety of imported products. The agency inspects approximately 10% of all meat and poultry imports at port.

7. System Provides for Research Capacity

FDA-little research capacity.

FSIS-USDA does most of the government's food safety research but it is done at ARS and FSIS has virtually no influence over focus of efforts.

8. System Has Appropriate Organizational Structure and Accountability

FDA-new paper from George Washington University's School of Public Health reports that no single official at FDA has a full time job directing food safety as well as budget and line authority over all the food elements of the FDA.[17] Within FDA, food safety is dispersed among three organizational units, the Center for Food Safety and Applied Nutrition, the Center for Veterinary Medicine and the Office of Regulatory

[15] http://www.cfsan.fda.gov/~furls/ffregsum.html, Accessed March 30, 2009.
[16] FDA Office of Regulatory Affairs. "FY 2007 ORA Field Workplan," October 1, 2006, p.03-20.
[17] Taylor, Michael R & David, Stephanie, 2009 *Unifying and Elevating Food Safety Leadership* at HHS, George Washington University Medical Center, School of Public and Health Services.

Affairs. Directors of each unit report to the Commissioner but coordination responsibility rests with Associate Commissioner for Foods who is housed in the Office of FDA's deputy commissioner for Operations. The associate commissioner for foods, sometimes called the FDA's food "czar" has no line authority and no control over the food safety budget. The FDA Commissioner reports directly to the Secretary of HHS but historically the Commissioner has given little time to oversight of food safety functions.

FSIS—The USDA Reorganization Act of 1994 removed food safety activities from USDA marketing and animal health activities and created a separate entity to protect public health program from undue influence.

The Act also created the Under Secretary for Food Safety, the highest ranking food safety official in government and gave this Level III official direct and specific responsibility for oversight and administration of the USDA's meat, poultry and egg inspection programs. Act requires that Under Secretary be someone qualified by training or experience to address food safety issues. Under Secretary is under direction of the USDA secretary and therefore not entirely free from influence driven by agricultural interests. However, both Democratic and Republican Administrations have, since 1994, sought to appoint individuals with food safety or public health credentials. Industry continues to apply pressure to appoint someone with ties to the industry.

<u>System Has Adequate Budget and Staff Resources</u>

FDA- the FDA's food budget for FY2009 is $648.7 million ($210 million for the Center for Food Safety and $438.2 million for food related activities of the Office of Regulatory Affairs). In FY 2008, there were 2,800 food related staff, 1,900 in the field and 900 headquarters staff. FDA inspection (compliance) staff have science education and training.

For most of the last 25 years, until recently, the FDA budget has been either reduced or flat. The food portion of the FDA budget suffered during part of that period because money was directed to the drug program in order to assure that appropriated funds were sufficient to keep drug user fees in place.

FSIS-2008 budget of $930 million in appropriated funds in FY 2008, and $140 million in fees paid by companies that want to operate additional shifts beyond those covered by federal inspection. FSIS has 9,400 staff. Approximately 8,000 of the staff are present in meat and poultry plants on a daily basis. The FSIS staff includes 1,000 doctors of veterinary medicine. Since HACCP, FSIS has created a compliance staff with 300 Enforcement, Investigations and Analysis Officers (EIAO) and program investigators in

addition to the inspection staff. A risk-based system will require FSIS to upgrade GS level and training of inspectors to handle new tasks.

Conclusion

There has been extensive discussion of reorganizing inspection functions. CFA supports creation of a single independent food safety agency that would combine all federal food safety functions.

As an interim step we support the approach Representative DeLauro has taken in H.R. 875 to divide FDA into a Federal Drug Administration and a Food Safety Administration within HHS, providing separate budget authority and leadership for food.

CFA does not support moving meat and poultry inspection to the Department of HHS. Addressing the very serious problems that now plague FDA's food safety programs and possibly creating a new Food Safety Administration within HHS will be a major undertaking, not leaving resources for integrating a much larger program.

In addition, as the FDA has slipped into dysfunction, the food safety functions of the USDA have made some progress toward a more modern and science-based program. Little more can be done without rewriting the authorizing statutes. We urge this committee, in cooperation with the Obama Administration, to take the lead in developing new authority embracing the elements discussed here.

Occasionally, it is proposed that FDA's food safety functions be moved to a new Department of Food and Agriculture. I'm not sure how Consumer Federation of America would feel about that. However, with or without food safety functions, creating a Department of Food and Agriculture that acknowledges and embraces all the people of the U.S. as its constituency is an idea whose time I hope will come.

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