

The Need for Food Traceability Programs

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Outline

- Challenges for Food Safety
- Why are there concerns about food tracking?
- What is coming from Congress?
- Will there be a requirement for food tracking?
 - Where is FDA on product tracking?
- The future

Changes and Challenges

- Consumer demand for items 24/7, year round
- Increasing global food supply
 - Approximately 15% of food is now imported
 - Imported from over 150 countries
 - Imported through over 300 ports
 - Over 200,000 foreign facilities registered with FDA for imports (not including farms or restaurants)
 - Over 150,000 domestic facilities registered with FDA

Changes and Challenges

- Distribution systems – broad and fast
- Wide variation in practices
- Lack of clear preventive controls
- Greater recognition of outbreaks
- Erosion of the public health infrastructure to investigate outbreaks
- Greater media attention
- Loss of consumer confidence

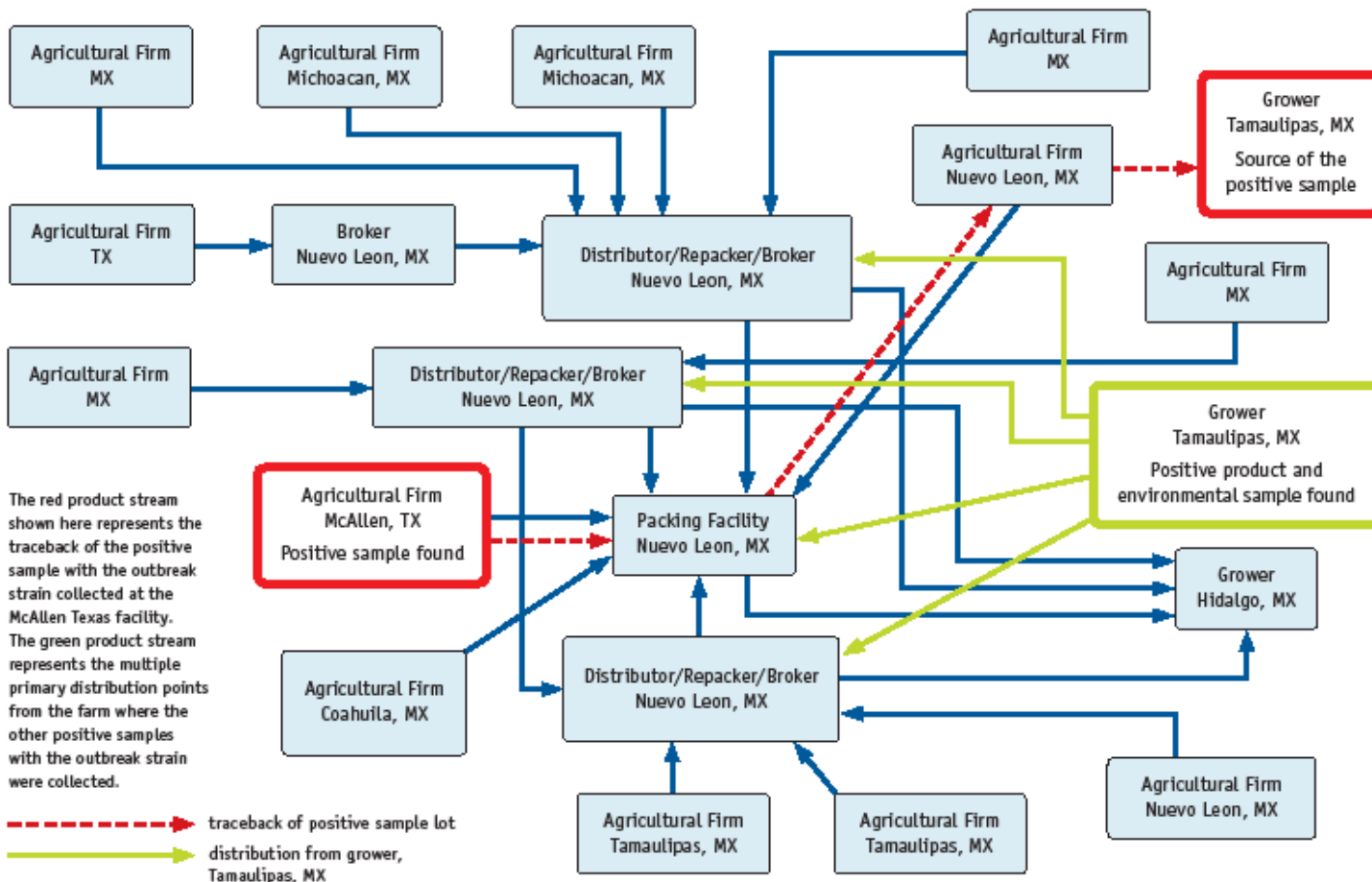
Salmonella saintpaul – 2008

- 1450 + cases
- May/June - Epidemiology indicated tomatoes
 - Trace back led to two countries, multiple farms
- Subsequent epidemiology suggested tomatoes and hot peppers
- July- trace back of peppers
- July 21 - positive sample found at distributor in McAllen TX
 - Trace back to MX
- Inspection and sampling on farms in MX
- July 30th - positive samples found on farm in MX

A portion of the trace back diagram

Salmonella Saintpaul Outbreak Traceback & Distribution

Partial view of the traceback & distribution of peppers from Mexico: July 16 – July 22, 2008



The red product stream shown here represents the traceback of the positive sample with the outbreak strain collected at the McAllen Texas facility. The green product stream represents the multiple primary distribution points from the farm where the other positive samples with the outbreak strain were collected.

Salmonella Typhimurium 2008/9

- Outbreak started in Sept/Oct 2008
- Product identified in Jan 2009
- Small producer with wide distribution
- Many did not know they had received PCA products
 - Product distributed to about 400 recipients
- Protracted and extensive recalls
 - 3913 products recalled from Jan to June

Congress – Food Safety Legislation

- House Bill HR2749 - passed
- Senate Bill S510 - drafted
- Multiple new legislative requirements

Congress

- Annual registration with a fee
- Hazard analysis, preventive controls, food safety plan
- Performance Standards
- Safety standards for produce (includes the grower)
- Increased inspections
- Greater criminal and civil penalties
- Country of origin labeling
- Unique identifiers for food facilities
- Traceability of food

Traceability – House (HR2749)

- “Issue trace back regulations that enables the Secretary to identify the history of the food in as short a time as practicable, but no longer than two business days”
- System for the US and for imports
- Identify technologies that:
 - Maintain the full pedigree of the origin and previous distribution
 - Links the history with the subsequent distribution
 - Ensures the system is interoperable
 - Uses a unique identifier for each facility

Traceability – Senate (S510)

- Improve ability to track and trace fruit and veg
- Establish a pilot project with produce industry
- Report to Congress after 18 months
- Publish a Notice of Proposed Rule Making by 24 months

Where is FDA on Product Tracking?

- It takes too long!
- Meanwhile:
 - Distribution continues
 - Exposure continues
 - Illness continues
 - Problems mount
 - Consumer confidence diminishes
 - Potential liability climbs

What is the Vision?

Now

- Improve the current system for product tracking when a product has been linked to illness.

Future

- Build sophistication into the system to allow for rapid, earlier tracing when multiple products may be implicated

What does FDA want from Product Tracing now?

- Rapid determination of contamination point
 - Containment and removal of product
 - Forward tracking information
 - Identify the cause of the problem
 - Targeted information to consumers
 - Minimize scope of incriminated product
 - Maximize protection
 - For the consumer
 - For the industry

Important attributes that facilitate speed

- Unique identifier allows for connectivity
- More consistent nomenclature for product throughout the supply chain
- All points in the supply chain covered
 - Farm to consumer interface
- Maximum utility of electronic records
- Interoperable systems allowing for connectivity between those handling product

Challenges

- “Only as strong as the weakest link”
 - Buy in from ALL the food industry
- Technological barriers
- Cost of implementation and maintaining system
- Need for the system to be international

Where is it all leading?

- New Regulations for the food industry
- Stricter requirements for imports
- Increased number of inspections
- More enforcement
- A proactive FDA
- Traceability requirements

The Solutions

- Stay ahead of the curve – be informed
- Build collaborations
- Focus on the science and force it to drive the policy.
- Utilize the power of social networking and the media as solutions are developed

Three Choices

- Fight the change
- Accept the change
- Lead the change

Thank You

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