

Collaborative Food Safety Forum

# Public Reporting of Food Import Metrics

“If you don't know where you are going, you might wind up  
someplace else.” Yogi Berra

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Public Interest

July 20, 2011



# CSPI/SFI and IACFO

- **The Center for Science in the Public Interest (CSPI) is a bi-national NGO representing over 850,000 consumers in both the U.S. and Canada.**
- **Safe Food International (SFI), a CSPI project, partners with consumer organizations in other regions of the world on food safety issues.**
- **The International Association of Consumer Organizations provides representation in Codex for consumer organizations on five continents.**

# The Importance of Metrics to Consumers

- Reliable data and appropriate metrics are essential to measure performance for managing food safety programs and making continuous improvements to better protect the public from foodborne disease.
- The keys to good metrics are:
  - Having good data,
  - Choosing the right things to measure, and
  - Transparent, consistent reporting.
- For consumers, public reporting of data and metrics provides accountability and builds trust in the food safety system.

# What Will FDA Need under FSMA

- FDA will need at least three specific data collections to implement import provisions under the FDA Food Safety Modernization Act.
  - Attribution data for the identification of high-risk foods.
  - International disease reporting for the identification of high-risk countries, territories and regions.
  - Inspection reports to establish the compliance histories for firms/facilities.
- Import metrics under FSMA include –
  - Number of inspections performed
  - Accrediting bodies performance
  - Auditors performance

# Data Resources

Outbreak  
Alert

Safe Food  
Internat'l

# Attribution Data in Outbreak Alert!

- **Outbreak Alert!** contains over 6,600 outbreaks between 1990-2008.
- Using CDC's Foodborne Outbreak Online Database (FOOD), CSPI maintains a database of those foodborne illness outbreaks with an **identified** etiology and food vehicle.
- Outbreaks in the CSPI database are placed within one of thirteen food categories. Each category is then subdivided into food types.



# Food Categories in Outbreak Alert!

## FDA-Regulated Food

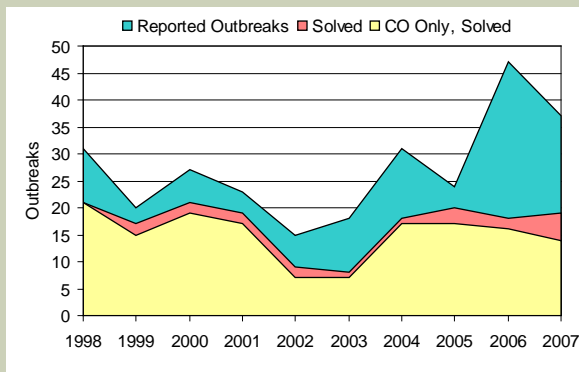
- Beverages
- Breads & Bakery
- Dairy
- Eggs & Egg Dishes
- Game
- Multi-Ingredient Foods (No-Meat)
- Produce
- Seafood

## USDA-Regulated Food

- Beef
- Pork
- Poultry
- Luncheon & Other Meats
  
- Both

# Total and Solved Outbreaks 1998-2007

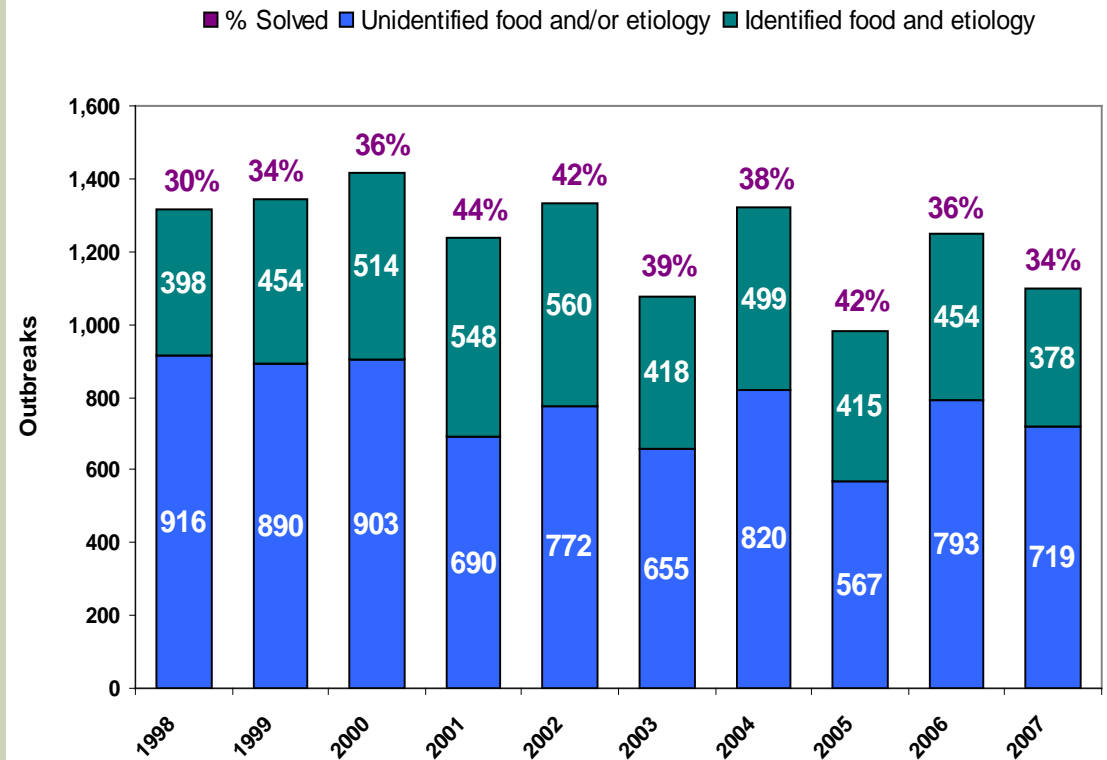
## Colorado\*



**273**  
**Reported Outbreaks to**  
**CDC**  
**170**  
**Solved Outbreaks**  
**150**  
**Solved Outbreaks CO**  
**Only†**

\* 10 years of data

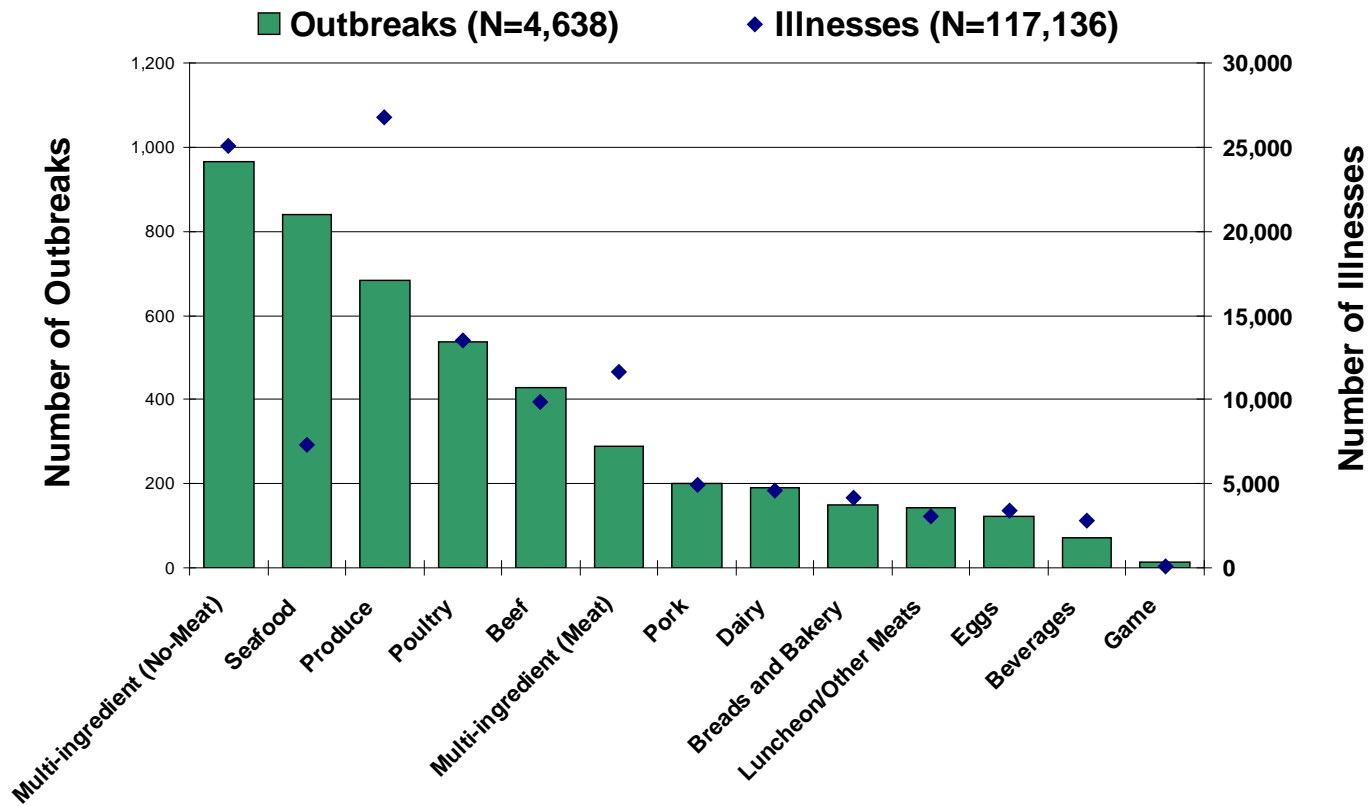
† Excludes multi-state outbreaks



Source: Outbreak Alert database



# Foods Linked to Solved Cases, 1998-2007



Source: Outbreak Alert database

# Identifying High-Risk Foreign Countries



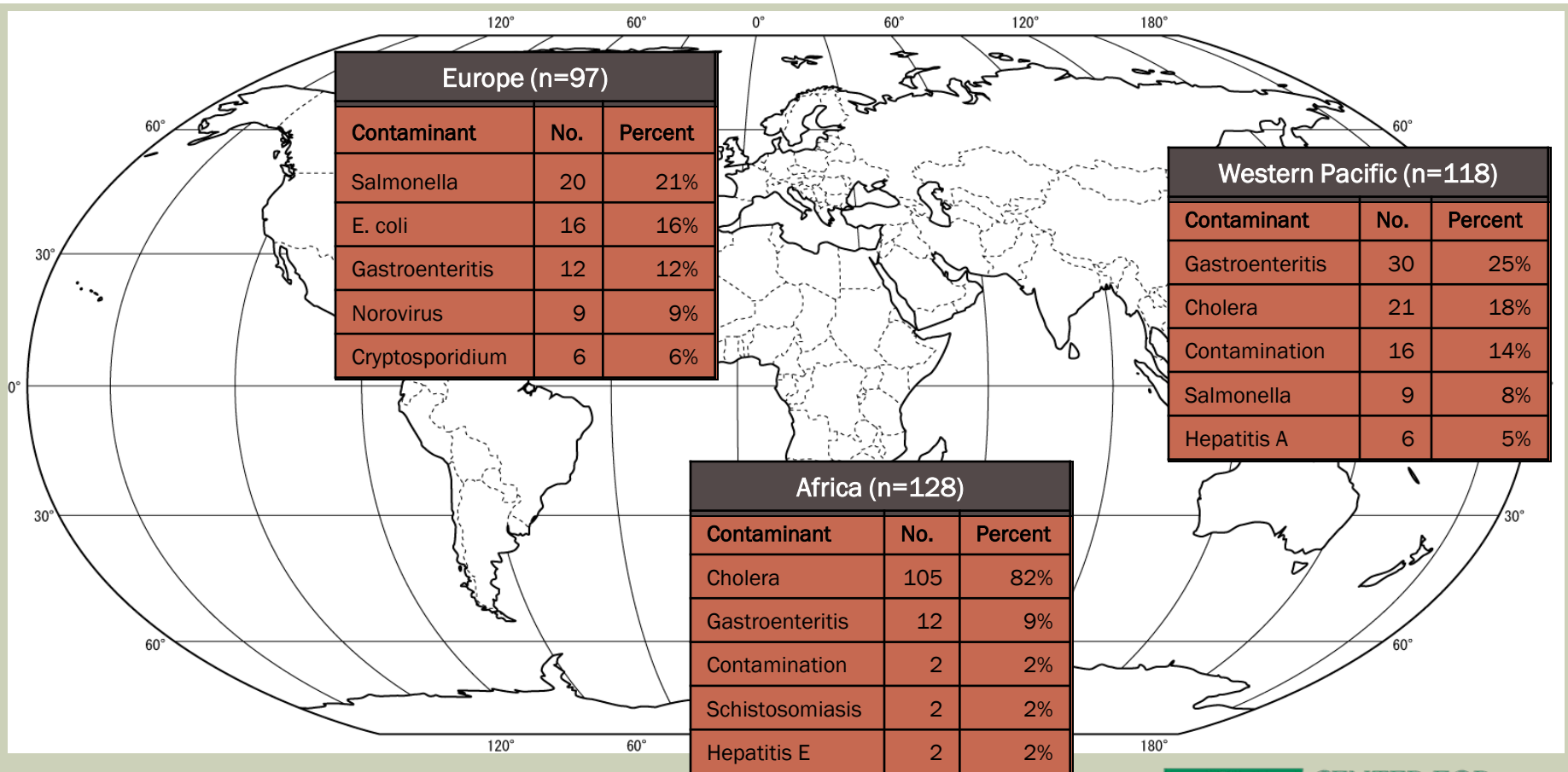
## Regions

- Africa
- Europe
- Western Pacific
- Latin America
- Middle East/North Africa
- Southeast Asia

## Information Sources

- ProMed
- Bites, safe food from farm to fork (ksu.edu)
- The Center for Animal Health and Food Safety at the University of Minnesota
- STOP E-Alerts

# Identifying Factors that May Affect Imports



Source: Safe Food International Reports

# Metrics Choices

Inspections  
Case Study

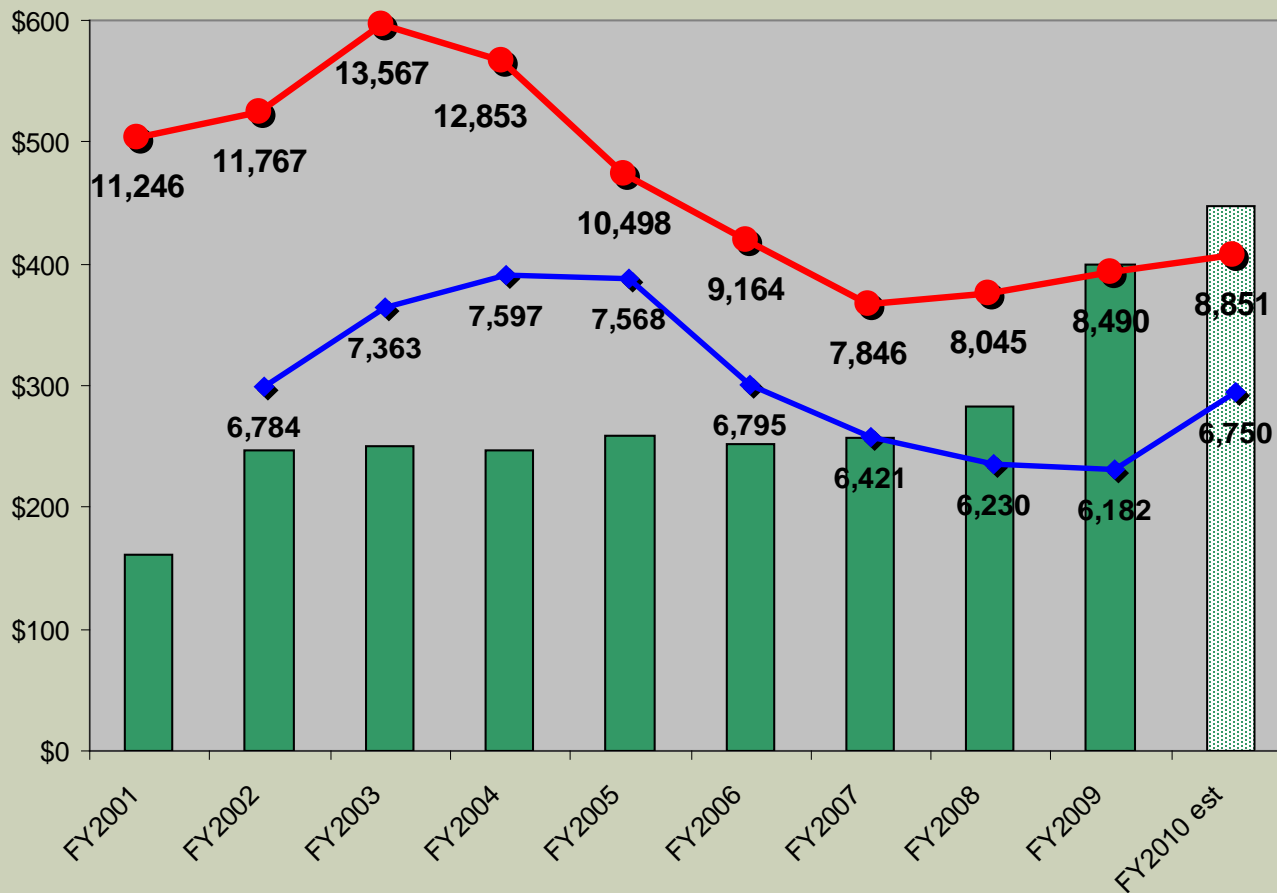
Refused  
Entry Case  
Study

# Choice of What is Measured Matters

- FDA-Track provides useful metrics for internal management but isn't as useful for informing public about what FDA does.
- Public metrics are available in FDA's budget justification documents, but may not tell a complete story.
- Other metrics have to be drawn out from publically available materials on FDA's website.



# Inspections Measured Against Funding

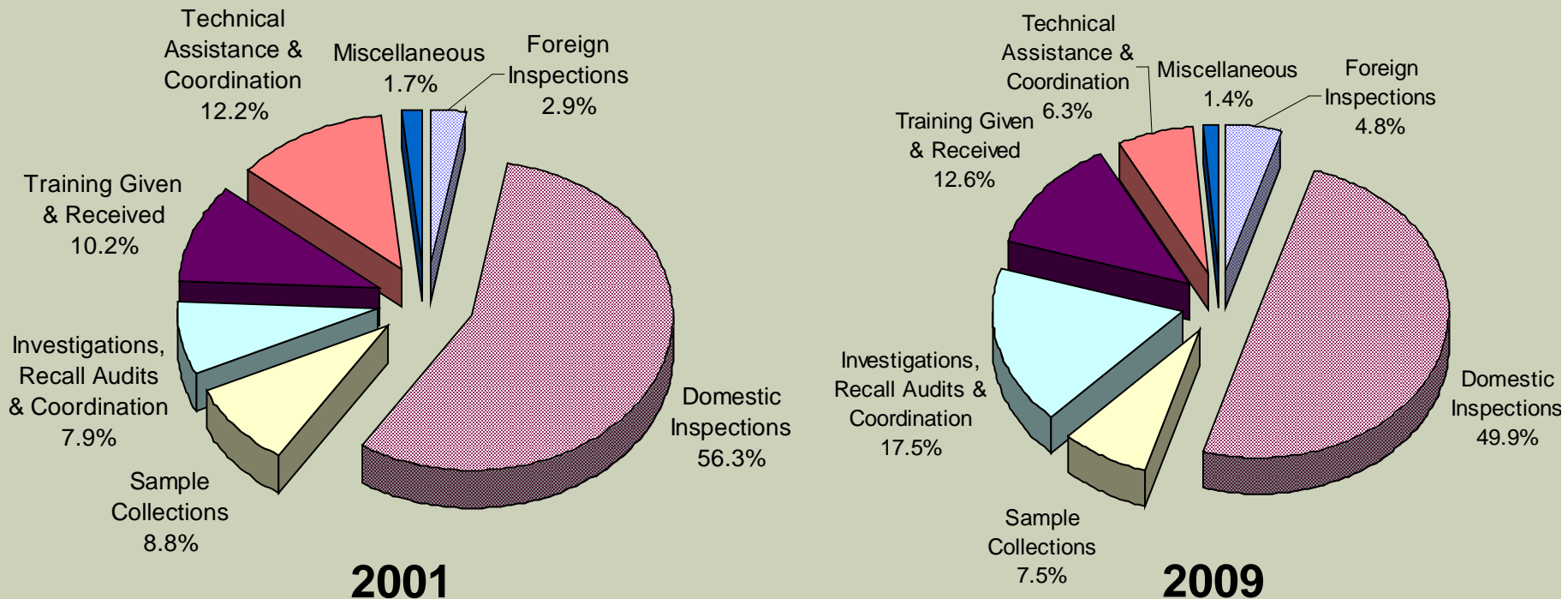


FDA Conducted  
Inspections

High-Risk  
Inspections

Source: FDA Budget Justifications

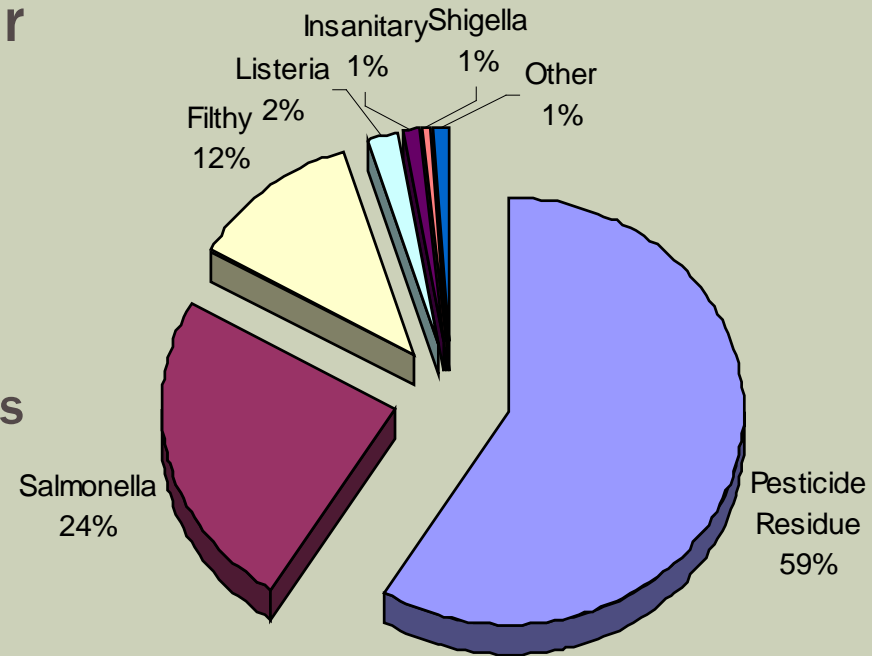
# Changes in Allocation of Staff Activities



Source: FDA

# Refusals of Imported Produce, 2009-2010

- Data gathered during border refusals can produce meaningful metrics
- Problems for consumers
  - Data presentation is not user friendly
  - Coding makes information less accessible to public

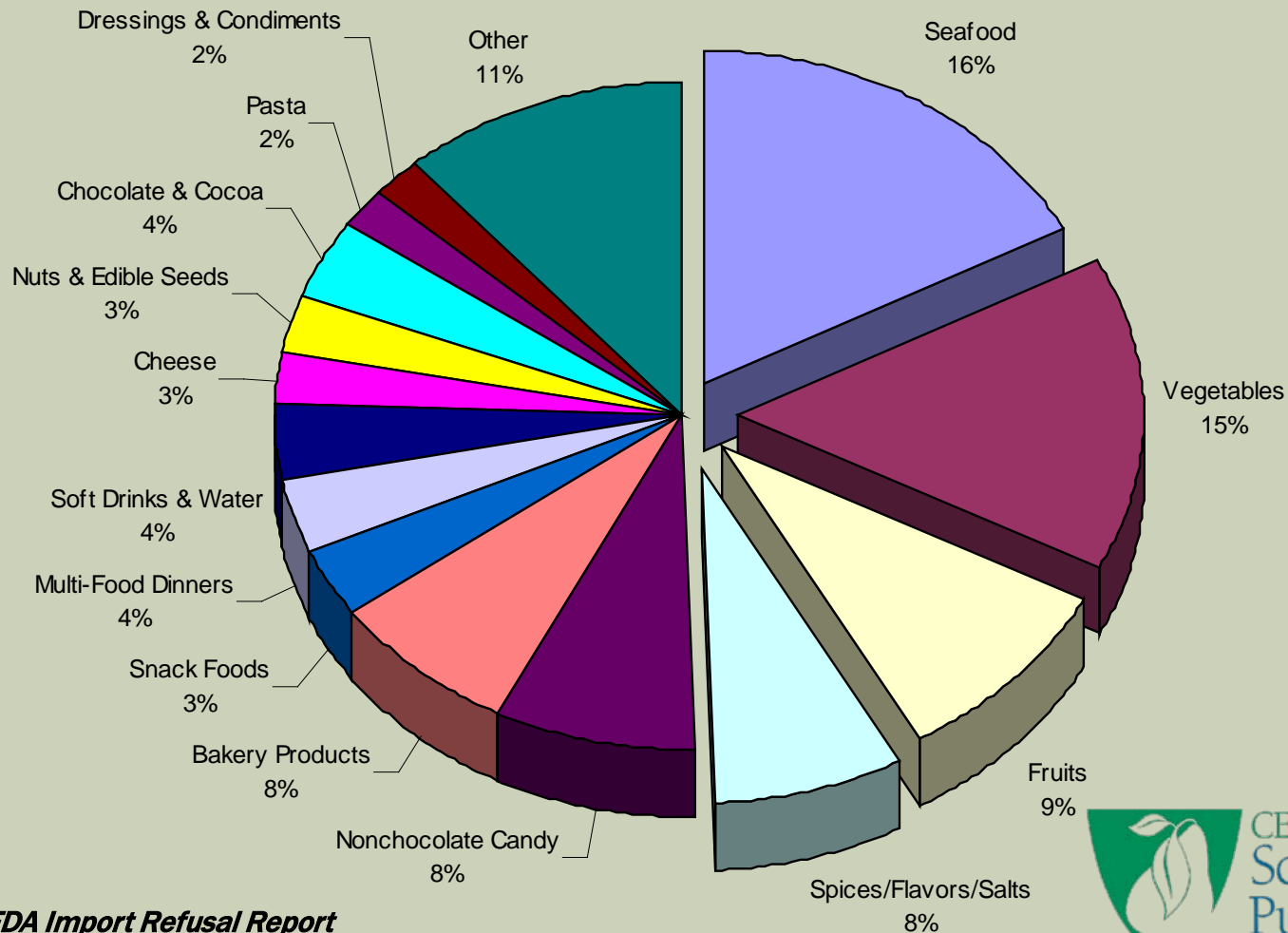


**Mexico**

*Source: FDA Import Refusal Report*



# Types of Imported Foods Frequently Refused, FY2010



Source: FDA Import Refusal Report

# Consistency

Vanishing  
Reports  
Case Study

Seafood  
HACCP  
Case Study

# Vanishing Data and Inconsistent Reporting

- **Changes in administrations result in lost data and metrics**
  - Historic budget justifications are no longer available beyond FY2005.
  - Strategic plans from prior administration difficult to find.
  - Audit reports on state inspections were taken down.
- **Metrics information changes**
  - Budget justifications change baseline for measuring high-risk performance after 2004.
  - Seafood HACCP evaluations stopped reporting overall implementation after 2001.

# Recommendation for Consumer Friendly Metrics

- **Data sources**
  - FDA should make use of publically available and validated data resources.
- **Baselines**
  - FDA should establish baselines for measuring progress on implementing FSMA.
- **Consistency**
  - Reporting should be consistent over time.
  - Baselines, such as past reports and plans should be publically available.
- **Transparency**
  - FDA should make data used in metrics publically available.

**Thank you!**

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