

**STATEMENT**  
Of the  
**NATIONAL RESTAURANT ASSOCIATION**  
On  
**Food Safety: Federal Efforts to Ensure the Safety of Imported Foods  
Are Inconsistent and Unreliable**  
For the  
**COMMITTEE ON GOVERNMENTAL AFFAIRS**  
Of the  
**UNITED STATES SENATE**  
September 4, 1998

The National Restaurant Association appreciates the opportunity to submit its views in this written statement for the record on the GAO report entitled *Food Safety: Federal Efforts to Ensure the Safety of Imported Foods are Inconsistent and Unreliable*. As the leaders of the hospitality industry, restaurants have had a long-standing commitment to food safety and the protection of our customers.

The National Restaurant Association is the leading business authority for the nation's \$336 billion restaurant industry comprised of over 799,000 restaurant locations. Our members operate full-service restaurants, quick-service units and cafeterias, and provide food service for such institutions as hospitals, universities and military clubs.

The U.S. restaurant industry has made a multi-million dollar investment in developing and improving food safety education over the past 25 years and continues that substantial investment, commitment and hard work today. In cooperation with federal and state health officials, the National Restaurant Association has developed state-of-the-art model regulations and educational and informational materials based upon current science, risk and Hazard Analysis Critical Control Point (HACCP). We have actively disseminated information to the restaurant industry and our customers and have worked with industry, state and local officials to adopt and incorporate new food safety regulations such as the FDA Food Code.

The Association has certified over one million managers in our ServSafe® training program, and we are currently training and certifying approximately 150,000 managers a year. ServSafe® has been translated into two foreign languages and is currently being licensed in additional countries and languages. It was developed through input and cooperation with regulatory officials, academia and industry professionals. ServSafe® is just one of multiple training programs available within the restaurant industry.

Food-borne illness has become a major public policy issue over the past six years, but not all of the public perceptions or proposed solutions are science- based or sound. We have recently received data that indicates that the foodborne illness estimates used by many to justify proposed legislation and increased governmental oversight are severely flawed and unreliable. The Centers for Disease Control the federal agency charged with development of national foodborne illness data states that the current published data “ *should not be the basis of conclusions concerning the absolute incidence of foodborne disease*”. It is becoming quite clear that we currently have no reliable data to evaluate the effectiveness of current or future proposed federal controls. We strongly believe that the first step in solving any perceived problem should be the verification of the problem, reliable illness data must be developed. CDC must be directed and funded to develop reliable estimates of foodborne illness and their causes.

Assuming a problem is identified any long-term improvement in food safety must be science- and risk-based. The best way to currently incorporate this approach into food safety systems is through the industry-developed HACCP approach. HACCP is not a one-size-fits-all measure and will require industry cooperation and participation to work effectively. Voluntary HACCP with government assistance and incentives has proven to be the most effective way to incorporate HACCP and improve food safety.

Because imported foods have become such a large segment of the foods we buy, we are strongly interested in the safety and the continued easy availability of imported foods. No single comment can accurately describe the sanitary conditions found in all international food-producing countries. The conditions in individual countries will vary greatly as will the conditions on individual farms within countries. Many of the major restaurant chains and suppliers to the restaurant industry today have developed complex supplier audit systems where they inspect, set specifications and take microbiological samples of imported products. These systems are based upon HACCP and are implemented to improve safety and quality. The audits include international farm, processor and transportation inspections; microbiological sampling; and strict quality control from farm to restaurant.

Finally we believe that the current federal system of imported food inspection is in need justification, verification and a logical focus. Adequately funded is need to identify the extent of the problem and subsequently conduct the number of science-based inspections and microbiological samples necessary to reliably assure international food safety. There are good and bad operators in all countries, and we should be able to rely on the federal government’s inspection programs at FDA to identify the bad operators and remove unsafe products from the system. This level of assurance will require a clear identification of the problem areas, the application of science-based concepts and increased funding over the current levels. We are not convinced, however, that these improvements warrant creation of a single food safety agency or

that a single agency would be more effective than proactive coordination and harmonization of regulatory agencies' food safety standards.

We strongly encourage the development of reliable foodborne illness data and a science- and risk-based import inspection system for imported foods. We should not continue to waste valuable resources on unverifiable illnesses or visual, often inadequate inspections. The maximum benefit and greatest assurance of safety will be gained by focusing efforts on identifiable illnesses and on those individual products and countries that have historically posed the greatest illness risk. Increased federal microbiological sampling must also be conducted using scientific statistical assurance techniques and not the currently used minimum or "shotgun" approaches.

Current initiatives such as trace-back to the farm of origin and country-of-origin labeling have not demonstrated that the economic impact will justify the minimal gain in food safety. These proposals concentrate efforts on identifying imported products and assessing responsibility after an illness happens. Identification of imported products may inadvertently sensationalize unfounded fears of the unknown with regard to a foreign country's sanitary conditions. From a practical standpoint in our industry, country-of-origin labeling in restaurants would be unworkable and cost-prohibitive because of the changing daily supply of menu items.

Trace-back is clearly a system to assess blame after the illness outbreak. We strongly recommend that the committee take a more proactive view, as discussed previously, and explore more innovative science-based solutions to problem identification and prevent contaminated food from reaching the U.S. market.

The National Restaurant Association takes a great interest in the systems and procedures used by federal agencies to ensure the safety of imported foods because, like consumers, restaurateurs rely on what is available in the marketplace. We believe that it is in our best interest to work with government, suppliers and others in the food industry to fully and honestly address this issue and assure food safety. We thank you for the opportunity to comment on these important proposals and would be happy to provide any additional information regarding our remarks or specific concerns of the committee.