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**Bruce R. Cords, Ph.D.**  
Vice President, Environment, Food Safety & Public Health

February 11, 2000

FDA/Dockets Management Branch (HFA-305)  
5630 Fishers Lane  
Room 106  
Rockville, MD 20852

**SUBJECT: President's Council on Food Safety Strategic Plan  
Docket No. 97N-0074**

Ecolab is a major supplier of detergents, sanitizers and other food safety-related products and services. Our market place includes agricultural production, food processing, food service and retail food outlets.

We appreciate the opportunity to provide input to the proposed strategic plan. We are in general support of the goals and objectives outlined in the January 7, 2000 draft as discussed at the January 19, 2000 meeting in Washington.

We offer the following specific observations and comments:

**Questions 2: What objectives and action items should be given priority? Why?**

Ecolab Comment: Many of the objectives and action items relate to identification of emerging pathogens, risk assessment and improved surveillance. A significant weakness in this strategy is the minimal attention given to intervention technologies. More specifically, resources directed towards new diagnostic methodologies for pathogen detection greatly exceed development of new intervention technologies.

Avenues to expedite government review and approval of innovative intervention technology have to be cleared. The FDA expedited review process is a helpful model that deserves expansion.

**Question 4: Are there organizational, statutory or other changes that you suggest we consider to achieve this goal? How would these changes promote public health and food safety? What barriers would need to be addressed?**

Ecolab Comment: In many cases, commercialization of new technologies requires interaction with several regulatory agencies in order to gain approval for a new product. If a single, stand-alone food safety agency is required to overcome the inefficiencies that exist today, we believe the Food and Drug Administration has the expertise and long standing experience in this area.

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**Question 4 (continued): Are there organizational, statutory or other changes that you suggest we consider to achieve this goal? How would these changes promote public health and food safety? What barriers would need to be addressed?**

Ecolab Comment: Technologies which hold the promise of improving the safety of our food supply should be given top priority and expedited reviews. A single agency would facilitate the process as defined in Objective 7 under the Risk Management Goal.

Absent a single agency approach, we would support a lead agency approval process to promote intervention technology with FDA as a preference.

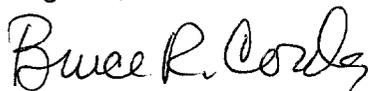
**Risk Management: Objective 9: Develop an improved system of assuring that foods being exported to the U.S. from other countries are produced under food safety measures that the U.S. concludes meet or otherwise achieve the appropriate level of public protection specified by the U.S.**

Ecolab Comment: The quality and safety of the food imported from outside the U.S. can be improved by greater collaboration between U.S. agencies and the analogous foreign agencies. If intervention technologies are accepted universally with the same focus we hope to reach domestically, we will have greater assurance the standards for imported foods are in line with domestic standards.

Again, the emphasis is on intervention at the source of potential contamination problems.

Beyond the points outlined above, Ecolab is eager to participate in this dialogue on food safety. We share the view of the National Restaurant Association, which represents a strong element of our customer base, that the private sector has to be a full partner in the planning and on-going implementation of a system as charged to the President's Council for Food Safety.

Regards,



Bruce R. Cords  
Vice President Environment, Food Safety and Public Health

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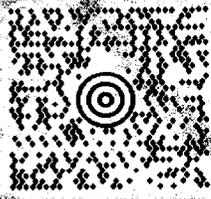
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