



Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852
RE: [Docket No. 98N-0359]

August 5, 2003

Dear Sir or Madam:

The Association of Public Health Laboratories (APHL) welcomes the opportunity to comment on the Food and Drug Administration/Center for Food Safety and Applied Nutrition (FDA/CFSAN) program priorities for fiscal year (FY) 2004. As you emphasized in your 2003 work plan, the security of the nation's food supply must continue to be of prime importance in 2004. Other food safety issues must also continue to be addressed.

APHL is a professional association that represents its member national, state, city, and local public health laboratories. It also supports the work of environmental, agriculture, and international laboratories on issues of public health importance. APHL's mission is to promote the role of public health laboratories in support of national and global objectives, and to promote policies and programs that assure continuous improvement in the quality of laboratory practices. As such, APHL is dedicated to protecting and preserving the health of our nation, and to promoting technology transfer in laboratory practices in order to foster better health globally.

APHL has a standing committee focusing on food safety and food security issues. Since public health laboratories are important partners for FDA/CFSAN, we would like to suggest an added objective to Part III "Assuring Food Safety: Crosscutting Areas". Suggested wording would be "Appoint an FDA/CFSAN liaison to the Food Safety Committee of the APHL to actively participate in strategy and planning of the laboratory activities necessary to support a public health food safety mission."

We would also like to take this opportunity to stress the importance of your 2003 Strategy 1.2.2. Progress to date on the development of the Food Emergency Response Network as part of the Laboratory Response Network (LRN) has been slow. As state laboratories do not have the procedures, equipment, and training necessary to detect and identify threat agents in food and drug products, this leaves the nation's food supply vulnerable. APHL members are anxious to assist in this endeavor. FDA/CFSAN participation on the APHL Food Safety Committee can provide an avenue for this assistance.

Again, thank you for this opportunity to comment. We look forward to a strengthened partnership with FDA/CFSAN as we all work to protect the health of our nation. If you have any questions, please do not hesitate to contact us at 202.822.5227.

Sincerely,

Norman Crouch, PhD
President

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