



October 19-21, 2021

*Oral Comment RE: Docket ID: FDA-2021-N-0929*

Good afternoon. I'm Bryan Hitchcock speaking on behalf of the Institute of Food Technologists (IFT).

IFT, founded in 1939, is a non-profit, scientific individual member institute whose mission is to connect global food system communities to promote and advance the science of food and its applications. IFT has more than 12,000 individual food scientist members from across industry, academia, government, and non-profit organizations. Organized around the core values of community, integrity, passion, progress, respect, and inclusion, IFT's members and staff are focused on overcoming barriers to feed our future safely by developing scientifically sound solutions.

IFT appreciates the opportunity to provide this comment at the **New Era of Smarter Food Safety Summit on E-Commerce**. IFT, and its Global Food Traceability Center, has a long history of active engagement in food safety and traceability in partnership with the FDA, non-profits and the private sector including undertaking task orders, conducting primary research, leading pre-competitive industry platforms, creating implementation tools, and delivering educational programming.

As with IFT's previous foundational piloting work to support FSMA and enhance food safety, IFT recognizes a suite of stepwise needs to achieve the FDA's articulated goals of understanding possible food safety risks of Business to Consumer (B2C) e-commerce and needed additional action. These include: 1) **supply chain mapping** to explicitly identify how product moves and who handles the product in each of the various B2C e-commerce supply chains, 2) modifying current outbreak investigation and reporting to enable **risk quantification** associated with B2C e-commerce supply chains, and 3) then developing a **risk ranking model** to support any additional action. Following this stepwise approach will illuminate **possible food safety risks** and reveal **what additional courses of action may be warranted** to address these potential or realized food safety vulnerabilities. We commend efforts to further enhance and clarify requirements for safe, transparent e-commerce.

In addition to unique structural risks that may characterize B2C e-commerce supply chains, IFT recognizes that these retailers have a unique set of challenges that diverge in important ways from conventional food retailers. IFT encourages the FDA to work with neutral technical service providers to convene key stakeholders, understand their educational needs, and support development of educational materials that recognize and speak to these differences and needs. IFT believes this will be critical to mitigating food safety risks in this sector.

IFT looks forward to improving e-commerce food safety and stands ready to partner with the FDA and private enterprise in quantifying possible food safety risks and supporting efforts to design and implement methods to mitigate them. Just as in any other channel, e-commerce consumers are counting on us to provide them with great tasting, nutritious, and most importantly, safe food. Thank you for considering our comment on this important initiative.