



SAFE FOOD COALITION

August 3, 2011

Division of Dockets Management
U.S. Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

RE: Docket #FDA-2011-N-0197

The members of the Make Our Food Safe Coalition and the Safe Food Coalition appreciate the opportunity to comment on the administrative detention provisions of the FDA Food Safety Modernization Act (FSMA).¹

Our coalitions support the interim final rule published in the Federal Register on May 5, 2011. We believe that the change in the agency's administrative detention authority, made by FSMA, can greatly enhance the effectiveness of this enforcement tool in protecting the public health and preventing foodborne illness. We strongly urge the agency not to shy away from using this tool, when appropriate; every time that administrative detention is invoked, its deterrent effect is strengthened.

We expect to have additional comments on the use of administrative detention in the context of specific provisions in the FSMA, such as the requirement for preventive controls, and we will raise those issues as appropriate during subsequent opportunities for public comment on those provisions.

¹ The following groups have endorsed these comments: American Public Health Association, Center for Foodborne Illness Research & Prevention, Center for Science in the Public Interest, Consumer Federation of America, Consumers Union, Food & Water Watch, Government Accountability Project, National Consumers League, the Pew Health Group, and STOP Foodborne Illness (formerly S.T.O.P. – Safe Tables Our Priority).