Lessons Learned; where do we go from here?
FSMA is a market-driven regulatory framework – the public-private dialectic is already built in.

• Food safety is not optional; either the market steps up or regs get stepped up.

• Food safety is not a competitive issue; everyone is interested in a preventive approach – fewer lives lost.

• Sharing is essential for effective training, environmental monitoring, managing false positives, compliance and best practices.

• Agencies have standards, companies have data – how can they be leveraged for the common good without creating selective bads?

• Can we say: **Mandatory rules correct market failures, but voluntary tools create market advantages?**
Partnerships are voluntary.

- Everyone has their own motivations.
- Partnership is where incentives and benefits converge.
- It has to work for everyone. It shouldn’t hurt.
- Benefits belong to the whole partnership.
Collecting gets you from content to impact.
THE GREAT FEEDBACK LOOP

Regulatory framework
Data sharing
PPP
Data review
Industry training

Zone of vulnerability
Last mile is always the hardest

Safe zone for sharing
Transparency without exposure

Strategic alignment around standards
Incentives for sustained sharing

Safe Food
FSMA Phase 3 M&E

TURNING RISK INTO REWARD

© Andrea E. Stumpf 2018
Why was the USDA Branded Food Products Database established as a Public-Private Partnership?

• The 6 Partners came together:
  • as this project could not be accomplished by any single Partner alone
  • with expertise in data quality and management, data collection, supply chain standards, and research knowledge that was essential to success
  • for a shared goal and the skill to deliver

• This successful PPP is a model for how multiple sectors can collaborate to benefit public health.
## Partnership Journey

<table>
<thead>
<tr>
<th>Year</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>Partnership Formed</td>
</tr>
<tr>
<td></td>
<td>Data Pilot Conducted</td>
</tr>
<tr>
<td></td>
<td>2 Listening Sessions for Public</td>
</tr>
<tr>
<td>2014</td>
<td>2nd Data Pilot Conducted</td>
</tr>
<tr>
<td>2015</td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>Sept 2016 Launched database at GODAN Summit</td>
</tr>
<tr>
<td></td>
<td>100K products loaded</td>
</tr>
<tr>
<td>2017</td>
<td>FAO INFOODS request for Global Expansion</td>
</tr>
<tr>
<td></td>
<td>215K products loaded</td>
</tr>
<tr>
<td>2018</td>
<td>May 2018 229K products loaded</td>
</tr>
</tbody>
</table>
Evolution of Partnership Development


• Partnership formed in 2013

• Steering Committee
• Operations and Management Group
• Criteria Group
• Data Quality Subgroup
• IT Infrastructure Group
• Communications Group
Key Learnings

- Understand and Define all Data Elements
  - Communicate Data Limitations
  - Collaborate on Shared Terminology

- Better Understand the Use Case
  - Importance of Standardization for Comparison
  - Nutrition Facts Replica
  - Year Book Perspective & Archiving Data

- Don’t Dictate - Let the Data Tell the Story
  - Food Labels Are Complex

- Create a Roadmap and Meet Regularly with Partnership
  - Future Features Must Be Captured & Communicated
  - Maximize Collaboration
The Great Feedback Loop

Zone of vulnerability
Last mile is always the hardest

Safe zone for sharing
Transparency without exposure

Strategic alignment around standards
Incentives for sustained sharing

Safe Food

FSMA Phase 3 M&E

Turning Risk Into Reward

© Andrea E. Stumpf 2018
Concerns about data sharing

• What do you need?
• How will it be used?
• Our lawyers ...both public sector and private sector
• Will there be punitive measure?
### Matrix of outcomes on specific indicators

<table>
<thead>
<tr>
<th>Specific indicators of outcomes</th>
<th>Planned indicator (2016)</th>
<th>Actual indicator</th>
<th>Sources of information</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Training of trainers programs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lead trainers trained</td>
<td># Trainers</td>
<td>Training records/certificates issued</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supplier trainers trained</td>
<td># Trainers</td>
<td>Training records/certificates issued</td>
<td></td>
<td></td>
</tr>
<tr>
<td># Suppliers/trainer achieving food safety compliance</td>
<td># Suppliers</td>
<td>Gap analysis and third party audit checklists</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Increased knowledge (pre/post test)</td>
<td>%</td>
<td>Pre-test and post-test results &amp; Self-efficacy evaluations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prevent production of defective product</td>
<td>See notes</td>
<td>Financial, customers, internal controls/records</td>
<td>Reference GFSP MEWG table</td>
<td></td>
</tr>
<tr>
<td><strong>Supplier training programs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># Supplier training programs delivered</td>
<td>#</td>
<td>Training records</td>
<td></td>
<td></td>
</tr>
<tr>
<td># Supplier staff trained</td>
<td>#</td>
<td>Training records</td>
<td></td>
<td></td>
</tr>
<tr>
<td># of mentored visits to achieve compliance per/company</td>
<td>#</td>
<td>Trainer field records</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reported change in behavior in-plants (poor/good/excellent)</td>
<td>%</td>
<td>Trainer field records/follow-up survey/Food Safety Culture</td>
<td>FSC Toolkits available</td>
<td></td>
</tr>
<tr>
<td><strong>Food Safety</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># Suppliers/processors achieving food safety compliance</td>
<td># or %</td>
<td>Third party audit records</td>
<td>Compliance with government audits +/- GFSI or other supply chain requirements</td>
<td></td>
</tr>
<tr>
<td># Food safety culture/behavior change (Self-efficacy)</td>
<td>#</td>
<td>Company records</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Market metrics</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td># Food safety incidents/recalls reduction, etc.</td>
<td>#</td>
<td>Market metrics: market withdrawal, import alerts, recalls, actions by another company and/or other regulatory action.</td>
<td>Approved for minimum level audit frequency</td>
<td></td>
</tr>
<tr>
<td>Food safety perception improved - buyers/consumers complain</td>
<td># or %</td>
<td># Achieve minimum audit frequency (3-5 y)</td>
<td>TBD</td>
<td>Approved for minimum level audit frequency</td>
</tr>
<tr>
<td>Food products approved for purchase</td>
<td>TBD</td>
<td>Retail and commercial buyers records/surveys</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of shipments without defects</td>
<td>TBD</td>
<td>TBD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% supplier caused finished goods defects</td>
<td>TBD</td>
<td>TBD</td>
<td>Reference GFSP MEWG table</td>
<td></td>
</tr>
<tr>
<td><strong>Product or commodity specific focused outcomes/expectations</strong></td>
<td>TBD</td>
<td>TBD</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**
- Training records/certificates issued
- Gap analysis and third party audit checklists
- Pre-test and post-test results & Self-efficacy evaluations
- See notes
- Financial, customers, internal controls/records
- Reference GFSP MEWG table
- FSC Toolkits available
- Market metrics: market withdrawal, import alerts, recalls, actions by another company and/or other regulatory action.
- Approved for minimum level audit frequency
- Reference GFSP MEWG table
Develop a white paper

Share with group
FDA
Industry

Evolution of Partnership Development
Steering Committee
Operations and Management Group
Criteria Group
Data Quality Subgroup
IT Infrastructure Group
Communications Group
1. Be clear.
2. Be clean.
3. Be modular.
4. Be flexible.
5. Be comprehensive.
6. Be balanced.
7. Be contextual.
8. Be ready.
9. Be (a)ware.
10. Keep it simple.

MY TEN TRIED AND TRUE TIPS

Details in my forthcoming book. 👍