

IFIC Oral Comments to FDA Listening Session

“Public Meeting: Modernizing Recalls of FDA-Regulated Products”

Friday, September 29, 2023

FDA Offices – White Oak, MD

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Overview

The International Food Information Council (IFIC) applauds and supports the United States Food and Drug Administration (FDA) as it seeks to modernize recalls of FDA-regulated products. Specifically, we would like to put forth the following recommendations:

- Conduct consumer research to understand Americans’ perception of food safety and recall communication challenges and opportunities.
- Incorporate, acknowledge, and respect the cultural sensitivities and behaviors among diverse/underserved populations.
- Utilize best practices when communicating “risk vs. hazard” during food recalls.
- Equip stakeholders and “experts in community life” with tools and resources to support successful recall strategies.
- Reconvene FDA Risk Communications Advisory Committee, consisting of industry, academia, and consumer groups.

As a 501(c)3 non-profit organization, IFIC serves the public good by effectively communicating science-based information on food safety, nutrition, and sustainable food systems. IFIC’s comments are rooted in more than 20 years of consumer insights on food safety and the core principles of effective risk communications.

To build upon IFIC’s recommendations, we would like to address the following FDA interest areas specifically:

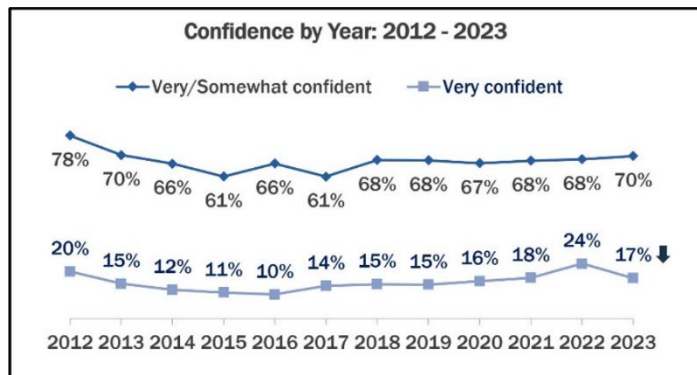
- Successful recall strategies, including methods to reach underserved communities
- Public warning strategies, including press releases, social media, and other communication tools

Building a successful recall strategy and reaching underserved populations requires consumer research and community partners.

A successful recall strategy must be built on trust and confidence among all Americans, including underserved Americans. The latest [IFIC Food & Health Survey](#) reveals that only 70% of Americans are somewhat or very confident in the safety of the U.S. food supply, with just 17% of consumers expressing that they are very confident¹. This lack of confidence is more pronounced among some underserved populations.

¹ <https://foodinsight.org/2023-food-and-health-survey/>

The U.S. Department of Human Services (HHS) defines “underserved” communities as “populations that do not have access to medical care; this includes rural, elderly, blue-collar, and poor populations².” IFIC consumer research³ in the chart below notes that of those lacking confidence in the food supply’s safety, upwards of 30% include demographics parallel to the HHS underserved definition and include younger, rural, white males and females without college degrees.



Source: 2023 IFIC Food & Health Survey

The question remains, how do we inform these communities about the risk of foodborne illness from a recalled product while understanding the socioeconomic and environmental challenges of these communities when 1) they are not confident in the safety of the food supply to begin with; OR 2) they may not have access/transportation to a retailer to return the product; OR 3) their current or next meal is somehow dependent on that recalled product; OR 4) they do not trust those in the position to impart food safety knowledge. It is imperative that we conduct comprehensive consumer research to better understand the similarities and differences among the attitudes, beliefs, and behaviors of these Americans as well as develop culturally sensitive and dignified communications that not only impart recall information but also build trust.

Public warning strategies should incorporate effective risk communication principles and be inclusive of experts in community life.

Food safety warnings are only effective if the intended behavior is achieved. Perhaps the risk was not clearly defined, or the recommended actions were not easily achievable. These are the perils of ineffective risk communication.

As stewards of effective crisis and risk communication, our duty is to “be first; be right; be credible.”⁴ But we did not say, “be culturally sensitive or even aware of your target populations’ needs”⁵; this would

² <https://toolkit.ncats.nih.gov/glossary/underserved-group/#:~:text=Underserved%20groups%20refer%20to%20populations,more%20or%20the%20included%20categories>.

³ <https://foodinsight.org/2023-food-and-health-survey/>

⁴ https://www.cdc.gov/healthcommunication/risk_communication.html#:~:text=Be%20first%2C%20be%20right%2C%20be,their%20health%20and%20well%2Dbeing.

⁵ https://books.google.com/books?hl=en&lr=&id=L23u2_EV3VQC&oi=fnd&pg=PR2&dq=best+practices+in+effective+risk+communication+sellnow&ots=38e_n3Dom&sig=MsVgNjC_LaD84PLi5sh7zw2cuXw#v=onepage&q=best%20practices%20in%20effective%20risk%20communication%20sellnow&f=false

include an understanding of the intended audiences' "food safety" trusted sources of information, literacy and language barriers that may exist, their spheres of influence in everyday life, access to health care (adequate or not so adequate) or even access to basic technology and credible sources of information. As communicators, we know that "one size does not fit all," and we strongly encourage the best and most effective risk communication principles be incorporated into practical recommendations to reduce risk when communicating recalls to the public.

As the purpose of this FDA comment submission is "to modernize recalls of FDA-regulated products," we must acknowledge the fact that there are cultural challenges and barriers to the intended behavior. As food safety, nutrition stakeholders and risk communicators, we must emphasize the core principle of culturally sensitive message development such that we can successfully reach targeted communities with credible information that is relevant and respectful. Outcomes can then be measured by behavior.

One approach to achieve this is to identify and partner with trusted community leaders and individuals who are unique to the community. For example, within certain communities, barbershops, hair salons and clergy/places of worship remain mainstays of community knowledge and information. How might we empower these "experts in community life" with tools, resources, and science-based information to become stewards of food recalls and public health alerts?

The opportunity now is to include "experts in community life" as contributors to the development, dissemination, and assessment of these efforts. One way this can be achieved is by providing open and fair environments to convene thoughtful discussions among food safety experts, regulators, consumers, public health, community leaders, and other stakeholders, including the media and journalists. Providing these open and non-threatening environments for people with lived experiences that are inclusive of multiple sectors and perspectives can be an asset to both food recall communication as well as protecting public health.

Finally, to modernize the (food) recall process, IFIC recommends the Agency to reconvene FDA's Risk Communication Committee, whose primary role was to "advise the Commissioner on methods to communicate risk." IFIC additionally welcomes the opportunity to collaborate and serve all Americans with consumer insights, stakeholder engagement, or thought leadership in your quest to modernize recalls of FDA-regulated products. By considering these and other stakeholder recommendations, we feel that the FDA can and will modernize its food recall process.

Thank you for the opportunity to share our recommendations.

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