



May 29, 2020

Mindy M. Brashears
Under Secretary for Food Safety
Food Safety and Inspection Service
US Department of Agriculture
Room: 331-E Jamie L. Whitten Building
1400 Independence Avenue, SW
Washington, DC 20250-0258

RE: Doc. # FSIS–2020–0011 Notice of Request for a New Information Collection (Laboratory Assessment Requests)

Dear Dr. Brashear:

The American Association for Laboratory Accreditation (A2LA) appreciates the opportunity to provide comment regarding your request for information on laboratory assessments, **Doc. # FSIS–2020–0011**.

A2LA is a non-profit, accreditation body with over 3700 actively accredited organizations located in all 50 states as well as an international presence. We have been granting accreditation to testing laboratories since 1979. Specific to food testing, we have been providing accreditation services to food testing laboratories for over two decades and we currently have over five hundred food testing laboratories accredited. The criteria forming the basis for our laboratory accreditation program is ISO/IEC 17025, General requirements for the competence of testing and calibration laboratories. We ourselves have been evaluated against rigorous standards in providing these accreditation services and are recognized globally as an International Laboratory Accreditation Cooperation (ILAC)-recognized accreditation body and an International Accreditation Forum (IAF)-recognized accreditation body.

We support and appreciate that USDA FSIS is considering relying on accreditation for the non-FSIS testing laboratories; however, we respectfully request that the agency considers strengthening this language by requiring ISO/IEC 17025 accreditation through an International Laboratory Accreditation Cooperation (ILAC) recognized accreditation body. Also, we recommend that the rule not be open to “or another third-party accreditation entity”. This recommended approach will ensure more consistency in the accreditation processes and results.

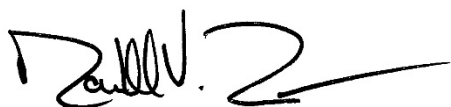
By relying on experienced and proven, ILAC-recognized accreditation bodies for conducting the assessments, on-going monitoring of the organization’s performance, and granting the accreditations; this will permit the USDA to focus time and resources on oversight of the accreditation bodies and enforcement actions. Reliance on ISO/IEC 17025:2017 accreditation is already widely accepted in the US food testing industry and is being maintained by commercial testing laboratories, in-house captive testing laboratories and Federal and state government laboratories.

By requiring ILAC-recognized accreditation as an integral part the rule, the USDA can be assured of a program that:

- is impartial and independent,
- has the necessary industry expertise assessing the testing laboratories,
- ensures that the laboratories are using appropriate methods and procedures, and
- ensures the laboratories have developed and implemented an effective management system.

Please do not hesitate to contact me with any further questions rquery@A2LA.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Randall Query", with a long horizontal flourish extending to the right.

Randall Query

Director of Government Relations

A2LA