

April 5, 2007

U.S. Department of Health and Human Services
Food and Drug Administration
Division of Dockets Management (HFA-305)
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Public Hearing on Safety of Fresh Produce (Docket No. 2007N-0051)

The American Farm Bureau Federation (AFBF) appreciates the opportunity to submit comments for the Food and Drug Administration (FDA) hearing on the safety of fresh produce held on April 13, 2007. The American food supply is some of the safest, most abundant and affordable food supply in the world. Farm Bureau supports public and private cooperative efforts to ensure the reliability of the food supply and provide factual information on its safety.

We believe the utilization of new technology, research and the inspection of imported agricultural products all play important roles in the safety of the food supply. Farm Bureau supports the use of modern technology as a means of assuring safer food products. Additionally, we support increased research by agricultural colleges on ways to minimize the risk of pathogens in food. A robust food safety inspection system is another important element of assuring the safety of the food supply. Farm Bureau supports additional funding for FDA inspections of imported food. Increases in agricultural imports of food have strained the FDA inspection system and additional resources are essential to maintaining high safety standards.

Safety of Fresh Produce

Farm Bureau supports voluntary, science-based food safety guidelines to help prevent microbial contamination of fresh produce. Guidelines must meet the following criteria:

1. Provide flexibility to accommodate the diversity of the fresh produce industry.
2. Remain voluntary rather than result in additional mandatory regulations.
3. Be consistent with existing state and federal regulations and guidelines.
4. Provide generic guidance only and not result in the development of commodity-specific guidelines.
5. Be implemented in a manner that will not impair the ability of U.S. producers to export produce

Farm Bureau opposes efforts to establish a federal regulatory standard for the production of fresh produce. Climatic conditions and cultural practices vary across the country and a single set of practices would place producers in jeopardy of inadvertently being out of compliance and create unjustified economic hardship. The Handler Agreement initiative in California, which creates a joint private-public program of safe produce production and processing, is an excellent example

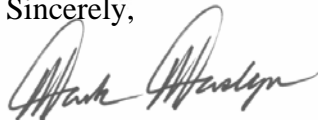
of cooperation that should be encouraged, particularly in consideration of FDA's limited resources to undertake inspection or inspection oversight.

FDA practices encompassed in Good Agricultural Practices (GAP) and Good Management Practices (GMP) guidance provide a sound basis for fresh produce grower, packer, and shipper practices. Additional effort, at federal and state levels, to create a more thorough educational infrastructure and delivery system, capable of reaching the many audiences within the fruit and vegetable industry, will be more effective in furthering food safety progress than federal regulations. For example, Cornell University has done an excellent job of curriculum development, collaboration and outreach. There is no need to create an entirely new curriculum, but expansion of existing educational resources and more widespread delivery is needed. As new scientific information becomes available curriculums can be updated to reflect the new information. Additional scientific research on growing practices is needed to relate to the behavior of microorganisms affecting human health in the following areas:

- Movement
Manner microorganisms are sustained in water, soil and plants (fruits and vegetables).
Water research should include – irrigation, spray mix, packinghouse rinse, ice and frost control practices.
- The role of composting; and
- Impact of wildlife, insects, birds and other animals in microorganism contamination.

Thank you for the opportunity to submit these comments. We look forward to continuing our working partnership to promote the safety of fresh produce.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Maslyn". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Maslyn".

Mark Maslyn
Executive Director
Public Policy