



Fresh Produce Food Safety Comments to FDA

Fresh fruit and vegetable producers are asked to submit comments to the Food and Drug Administration.

Deadline: June 13, 2007

Action Requested

Fresh fruit and vegetable producers are asked to submit comments to the Food and Drug Administration in writing or electronically.

Written Comments should be addressed as follows:

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: Safety of Fresh Produce Comments (Docket No. 2007N-0051)
(provide two copies of written comments)

Electronic comments should be submitted as follows:

Go to this link, <http://www.fda.gov/dockets/ecomments>, search for Docket No. 2007N-0051 and complete the on-line form. You may type comments into the form, paste comments into the form or attach comments.

Background

The Food and Drug Administration (FDA) is accepting comments regarding data and other scientific information about current agricultural and manufacturing practices used to produce, harvest, pack, cool, process and transport fresh produce; risk factors for contamination of fresh produce associated with these practices; and possible measures by FDA to enhance the safety of fresh produce. The complete *Federal Register* notice is available at <http://www.cfsan.fda.gov/~lrd/fr070227.html>.

The American Farm Bureau Federation [submitted comments](#) at an April 13, 2007 public hearing. Ohio Farm Bureau will soon submit comments. There is pressure for FDA to develop federal regulations. Ohio Farm Bureau is concerned that these regulations could 1) be geared toward large western produce growers, 2) negatively affect Midwest production, 3) negatively affect small retail growers and 4) negatively impact international trade.

Talking Points

- Good Agricultural Practices and Good Manufacturing Practices provide a good base for practices by growers, packers and shippers.
- Cornell University has done an excellent job of curriculum development, collaboration and outreach. There is no need to develop redundant curriculum.
- Additional effort to create a more thorough educational infrastructure and delivery system that is able to reach the many audiences within the fruit and vegetable grower sector will be more effective than federal regulations.
- New sound science should be added to the base curriculum as it is developed.
- Additional scientific research on growing practices is needed to relate to the behavior of microorganisms affecting human health in the following areas.
 - How microbial organisms that affect human health move and are sustained in water, soil and various fruit and vegetable plants;
 - Water research should include irrigation, spray mix, packinghouse, ice and frost control practices:
 - The role of composting; and
 - Impact of wildlife, insects, birds and other animals in microorganism contamination.
- Recognize that fresh produce regulations have the potential for growers to be in violation of other environmental (disposal of packinghouse water), worker safety (exposure to chlorine) and foreign trade (higher U.S. standards that limit import opportunities) regulations.
- There are factors such as the following that should make FDA extremely careful in developing rigorous federal standards.
 - climatic conditions
 - commodity differences in production practices and issues. (e.g. tree fruit production will have much different dynamics than leafy green vegetables)
 - different marketing and distribution systems. (e.g. a community supported agriculture systems where one grower supports 20 consumers is much different than a large grower who ships to 20 states)
 - the financial interest of a large grower, to implement practices and systems to limit liability, should not overburden smaller growers with unnecessary practices that would drive them out of business
 - increased federal standards could make U.S. producers unable to compete with foreign producers that would likely not have to meet the same standards
 - local and state regulations could be in conflict with federal regulations causing growers to be in a no-win situation
- Some issues are realistically beyond the control of growers. These could include air pollution, wildlife, insects and birds.

Who to Contact for More Information

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Feedback Request

Notify John Wargowsky via mail, e-mail or fax that you submitted comments.