



AFDO
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ASSOCIATION OF FOOD AND DRUG OFFICIALS

RESOLVING & PROMOTING PUBLIC HEALTH AND CONSUMER PROTECTION ISSUES

Safety of Fresh Produce: FDA Public Hearing April 13, 2007

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Association of Food and Drug
Officials (AFDO)

Association of Food and Drug Officials AFDO

- Established in 1896
- Mission: to foster uniformity in the adoption of food safety laws, rules and regulations

BACKGROUND

- Approached by tomato industry during tomato safety forum November, 2006
- Industry concern: potential patchwork of state/local laws and regulations
- General recognition that size/scope of FBIs associated w/ fresh produce are unacceptable



BACKGROUND

- Existing guidance broad, lacks specific criteria.
- Similar lack of appropriate responses when guidance is not met
- Need for research to address specific causes for microbiological contamination
- Need to move forward – best professional judgment where science is incomplete



AFDO Working Group Appointed

- Aller to Chair ad hoc committee/working group
- Initial charge to look beyond tomatoes
- Develop model code (regulation) to address produce safety at farm and packing house

WHY AFDO?

- History of strong partnership w/ federal counterparts
- Prior experience w/model codes:
 - Model Code “Cured, Salted and Smoked Fish Establishments GMPs”
 - Model Consumer Salvage Code
 - “Control of Listeria monocytogenes in Retail Establishments” (w/ Penn State)



WHY AFDO Model Code?

- Quicker than federal rule making
- More easily modified
- More open process
- Iterative, ongoing process – opportunity for periodic “ground truthing”
- As model code, provides mechanism for states/local authorities to address specific issues unique to that locale



WHY AFDO Model Code?

- Wider acceptance as a more collaborative work product
- Broader implementation especially at medium/smaller farms/packing houses



WHO is Participating?

- States: FL, CA, VA, OH, NC
- Federal: FDA, USDA
- Association of Fruit and Vegetable Inspection Standardization Agencies
- Industry: Western Growers Association, United Fresh Produce Association. National Restaurant Association (invited)
- Academia
- OTHERS?

NEXT STEPS

- Begin where guidance documents left off
- Incorporate recent work of leafy greens/CA efforts
- Extract overarching principles
- Recognition for commodity specific issues, metrics, responses
- Mechanism – conference calls, email, face to face at annual educational conference



SUMMARY

- Support FDA's leadership and desire to move forward. Guidance in directing research needs
- Urge federal partners to leverage limited research dollars
- AFDO offers a different approach to a regulatory response
- Welcome FDA's comments/suggestions
- Will continue to work collaboratively



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THANK YOU

AFDO will also submit written comments on the issues as identified in the FR notice

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