



J & K FRESH, LLC

A CUSTOMHOUSE BROKERAGE FIRM

ROSS JONES
LYNNETTE KEFFER

August 28, 2002

Docket Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Md. 20852

Re: Bioterrorism Act, Title III, Subtitle A
Section 305 (Registration of Food Facilities)

To Whom It May Concern:

This letter contains our comments for the above referenced regulation. I will first explain our company's role and experience with imported produce; which will enable FDA to more clearly see our position.

J & K Fresh is a Customhouse Brokerage firm specializing in the clearance of imported produce through Customs, FDA, and PPQ/USDA. A company in the foreign country exports the imported produce. In most cases, the exporting company will have contracts to buy fruit from various growers (farms). The produce is sent from the farm to a packinghouse to be packed and or palletized for export. A shipment may contain one or more than one hundred growers. It also may have been packed at more than one packinghouse. (This is especially true with the breakbulk/charter vessels. Some of these shipments have over 1,000,000 pounds of produce.)

Therefore, I propose that for the purpose of "Registration of food Facilities", FDA require that each foreign shipper of fresh produce be required to register, **not** the packing house and/or grower. Of course, the exporting company would have the responsibility of having an established protocol for the packinghouses and the growers they are contracted with.

02N-0276

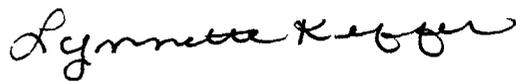
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In my view this would be the most efficient, least cumbersome way for FDA to register suppliers of produce. Through the shipper, FDA would be able to track the produce from the point of export all the way back to the plot of land where it was grown. Actually most shippers and importers already have that ability. A *bar-coding system* is utilized. This is so that in the unlikely event there is a problem at the consumer level; it can be tracked back to origin. Most large grocery chains require this ability (since 9-11).

I thank you for taking my comments into consideration when drafting the final regulation. If you have any questions or require additional information, the address, phone, and fax numbers are listed on the bottom of our letterhead (on the first page. My email is lynette@jkgfresh.com).

Sincerely,

J & K Fresh, LLC

A handwritten signature in cursive script that reads "Lynnette Keffer".

Lynnette A. Keffer
President

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WILSON LLC

6500 W. AV

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ROCKHILL, SC 29730

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 (Letter - 150 lbs)

Paid in Advance 1-800-247-2676

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