



Forging a partnership between farmers and consumers
• Working together for Ohio's farmers •

July 21, 2004

Division of Dockets Management (HFA- 305)
Food and Drug Administration
5630 Fishers Lane, RM. 1061
Rockville, MD 20852

Re: Docket No. 2004N-0258

The Ohio Farm Bureau Federation, Ohio's largest general farm organization, has been heavily involved in helping fruit and vegetable growers learn and implement good agricultural practices and good handling practices through participation in the Ohio Specialty Crop Food Safety Initiative. This effort uses materials and programs of the national Good Agricultural Practices Project being led by Cornell University.

Participation in this project has proven to be positive for Ohio's fruit and vegetable growers and buyers. The Ohio initiative has distributed publications of the national project that include: 1) Spanish and English brochures, 2) grower guides, 3) grower self-assessments, 4) bilingual educational posters and 4) a worker educational video. Numerous presentations to growers, extension educators and crop consultants using PowerPoint presentations developed by the project have increased awareness. On-farm consultations have lead to recommendations for adoption of good agricultural and good handling practices, the development of written food safety plans and mock third party audits that meet buyer demands and enhance food safety. On-farm bilingual worker sanitation and hygiene training has been conducted at a number of vegetable farms and positively impacted worker behavior.

The Ohio effort has been led by grower associations and organizations, Ohio State University Extension and professional consultants. It has also been supported with funding from the United States Department (USDA) of Agriculture Specialty Crop Block Grant program routed through the Ohio Department of Agriculture and USDA's Commodity Partnerships for Risk Management Education Program.

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The following provides requested feedback for FDA's proposed new produce food safety action plan.

We can make the following observations through two years of the Ohio Specialty Crop Food Safety Initiative: 1) Fruit and vegetable growers are receptive to adopting good agricultural and handling practices, 2) Grower adoption of these practices are greatly enhanced when tangible resources such as those provided through the national Good Agricultural Practices Project and an on-the-ground program such as the Ohio Specialty Crop Food Safety Initiative are available, 3) Growers respond to this effort best when the need to change is identified with meeting marketplace demands as opposed to meeting regulatory demands, 4) Efforts that began as a result of the 1998 guidance document are still being implemented across the country and need additional development, funding and support, and 5) Growers in states that do not have an effort similar to the Ohio Specialty Crop Food Safety Initiative are calling Ohio's program leaders for help and resources to enhance food safety efforts and meet buyer demands.

We specifically recommend and suggest the following:

1. FDA should use the national Good Agricultural Practices Project that is already an established network. This network could use additional resources to effectively reach more producers. New guidance documents are welcome and would be best channeled through this network in addition to other FDA channels. This network can also be a valuable feedback tool for FDA as it develops additional educational tools, reaches out to qualified researchers.
2. Since much of the nation's fruit and vegetable production involves a Latino workforce, language and cultural issues need to be considered when developing educational tools. Fruit and vegetable producers desire educational tools, including bilingual worker trainers to assist in this area.
3. One additional tool that would be well received is an on-line tool that assists fruit and vegetable producers in developing food safety plans to incorporate good agricultural and handling practices in their specific operations. This tool could provide producers a variety of intervention methods that apply to their specific operations. The Ohio Initiative's non-profit professional consultant, the Center for Innovative Food Technology is willing to develop this valuable tool if funding can be provided.
4. We caution that mandatory on-farm recordkeeping, monitoring and surveillance would be costly to producers and present an additional cost to domestic versus foreign producers, reducing the competitiveness of U.S. growers.

5. Research in the area of cost-effective sanitizing systems for use in the packinghouse that do not corrode or deteriorate equipment and are safe for workers would be beneficial.
6. This effort has lead to increased requirements by buyers that producers engage third party audits at significant cost to producers. This program is coordinated through the Federal-State Inspection Service and requires further development. It is critical that state partners in this program not be in a regulatory role when conducting audits. In addition to being more accessible in more states, the results of these audits need to be readily accessible to sophisticated produce buyers via the Internet. Consultation with produce buyers requiring third party audits would be instructive. Further development of the USDA Fresh Audit Verification Program that allows cost effective third party observations of good agricultural and handling practices would be valuable.
7. We believe that FDA should involve state food safety agencies, the Cornell University Good Agricultural Practices Project and organizations representing fruit and vegetable growers in developing and implementing action items to assure connection with state and local variations in the country's produce industry. One example is the growing popularity of produce auctions in the Midwest where local grocery stores purchase produce. Many of the producers that sell through these auctions are Amish. The Amish community has been included in Ohio's Initiative by adapting educational materials to low technology methods (posters) and building positive relationships.

Thank you for the opportunity to comment. If you desire additional information from us, please contact our staff person leading the Ohio effort, John Wargowsky at 614-246-8286 or jwargows@ofbf.org.

Sincerely,



John C. Fisher
Executive Vice President

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