



**Comments from the Mexican Secretariat of Agriculture, Livestock, Rural Development,
Fisheries and Food to the Safety Produce Initiative issued by the
Food and Drug Administration**
Deadline July 24 2004

On behalf of the Mexican Secretariat of Agriculture, Livestock, Rural Development, Fisheries and Food (SAGARPA) and its agencies involved in the process of food safety, we would like to submit the following comments.

Since the year 2000 food safety has become a major focus of SAGARPA, which has put into place a very ambitious policy with regard to food safety. A new Directorate General has been created which is now working aggressively and intensively to ensure the safety of fresh produce and livestock products.

Currently Mexico supplies more than 3 billion dollars of fresh produce to the United States, and in several products (tomatoes, eggplants, cucumbers, avocados, and mangoes, to name but a few), Mexico is an important supplier to the US market.

The Government's food safety policies are being adopted not only to protect the safety of Mexico's population, but to protect the safety of our main trading partners' population too. Therefore, we submit these comments hoping they will be taken into consideration by the FDA.

General Comments

1. Equivalency and harmonization must be a principle followed in this task. In that regard, whatever the approach adopted by the FDA, SAGARPA recommends that it take into account concepts from other initiatives which are currently being developed, like the Safe Quality Food Program, or the work already done by organizations such as Produce Marketing Association, the United Fresh Fruit and Vegetable Association, EUREPGAP (standards related to food safety), as well as programs being developed or already adopted by other countries. .
2. Mexico considers human safety to be above everything; and reducing food-borne illnesses and improving food safety systems should be a goal of all governments. Nevertheless, it is important that the US considers whatever commitments it has under its trade agreements and WTO in order to avoid trade disputes.
3. In this regard, although it is too soon to define whether these guidelines shall be mandatory, it has to be clear that when some requirements are applied on a mandatory basis to imported fresh produce, these also must be made mandatory for domestic product.



Comments to FDA Questions

1. What should be the underlying concepts and principles guiding the new action plan?

✍ FDA should focus on areas of greatest risk, and solutions proposed should be scientifically sound and economically viable. Fresh produce representing a major risk of contamination should be a priority.

✍ We consider that Objective 1 should include a strategy to promote the use of GAPs and GMPs in countries that export fresh produce to the US, such as Mexico.

✍ Objective 2 should include the establishment of a surveillance procedure to ensure that the general or specific commodity guidelines are being followed by the producers, packers and others.

2. What major practices contribute to the contamination of fresh produce by harmful pathogens?

✍ Commingling of product has at times lead to produce contamination, and has also made it harder to trace back. Standards for Points of Purchase (POP) and cold storage shall be defined.

✍ Handling is one of the most risky practices. Personal hygiene and health must be emphasized in every step of the chain. Washing and sanitation stations must be available in every field, packing, and distribution facility in order to prevent or reduce contamination.

✍ Consumer handling (or more precisely, mishandling) has never been a part of any GAP or GMP. Consumer handling can be a potential source of contamination or deterioration of the microbial quality of the produce. Therefore SAGARPA believes that consumer handling must be a priority focus. This point can be included on the Objective 3 of the Action Plan. Some guidance on this matter may be obtained from programs already in place, or being developed, for other products such as meat or processed meat products or prepared meals.

✍ Labeling, although at times impractical, should be considered as a way to inform or to communicate to consumers how to handle produce during the time from when it is purchased to the time it is consumed, cooked, or even frozen.

3. What measurements should be used to progress towards minimizing food-borne illnesses?



✍ A good measure of how well the action plan has been adopted by other countries will be the number of facilities that have adopted the guidelines in a country over the total number of facilities in that country that ship produce to the US.

4. Do FDA's current GAPs / GMPs need to be expanded or revised?

✍ GAPS established in the Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables do not contain specific considerations where areas of risk are identified. Therefore, guidelines must be included in order to facilitate the risk assessment by the company itself.

✍ It is important that new guidelines consider this fact. However, this must be balanced against the fact that elaborating a new guideline for each product would not only take too long, but would become extremely difficult to administer.

5. How should a food safety plan be structured to take into account the significant variations in food establishments, ranging from the size of the establishment to the products produced?

✍ The action plan should include a strategy to inform and train every member of the fresh produce supply chain in identifying the practices of major risk in its own field or facility.

✍ To create individual guidelines for the production or handling of every fresh food may be impractical. It will be easier and faster to elaborate a guideline for a group of fresh produce, whose edible parts are exposed to the same kind of risk during production, handling, packing, etc; instead of individual guidelines for each produce, which would not only take longer to create, but would be extremely difficult to administer.

6. What roles should Federal, State and local governments play in developing and implementing food safety action items?

✍ SAGARPA recommends that all authorities play a more active role in the implementation of guidelines or regulations.

8. Are there existing food safety standards (local, federal or international) that FDA should consider incorporating in its new food safety action plan?

✍ There are several Organizations such as the Food Marketing Institute (Safe Quality Food), or the work already done by organizations such as Produce Marketing Association, the United Fresh Fruit and Vegetable Association, EUREPGAP, CODEX Alimentarius and Government Agencies that have issued voluntary or mandatory standards. SAGARPA has elaborated voluntary and regulatory guidelines for products



like green onion, mango and tomatoes, and would be pleased to share these documents with the corresponding working groups.