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July 24, 2004

Electronic submission to: <http://www.fda.gov/dockets/ecomments>
and
By Fax: 301-827-6870

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

Subject: Docket No. 2004N-0258 -
Produce Safety from Production to Consumption: An Action Plan to Minimize
Foodborne Illness Associated With Fresh Produce, and published by the Food
and Drug Administration (FDA), Department of Health and Human Services, in
the Federal Register of June 15, 2004 (Volume 69, Number 114; 33,393-33,394)

To whom it may concern:

The Canadian Horticultural Council welcomes and appreciates the opportunity to
provide comments on the to the proposed 2004 Produce Safety Action Plan.

The Canadian Horticultural Council (CHC) is a voluntary, not-for-profit, national
association representing the diverse sector of Canadian agriculture known as
horticulture. The CHC has been committed to promoting the interests of its
members since 1922. Its mission is a commitment to advance the growth and
economic viability of horticulture by encouraging cooperation and understanding
to build national consensus on key issues so as to deliver unified and clear
representation to governments and other national and international parties.

The CHC's members are primarily involved in the production and packing of over
120 horticulture crops comprised of fruit, vegetables, flowers and ornamental
plants. The CHC is comprised of 105 members from across Canada as well as
three associate members from the United States.

In 199 the CHC and its members have undertook initiatives to develop and
implement numerous programs and initiatives to address the safety and security
of our products. Examples include the On-Farm Food Safety Guidelines for Fresh
Fruit and Vegetables in Canada as well as the Canadian Partners in Quality
Program. There are numerous others.

The CHC is fully committed to food safety and has invested significant time and
resources to improve food safety at the farm level. We also partner and

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collaborate with numerous stakeholders throughout the food continuum and actively participate in several national and international traceability initiatives.

In addition to the On-Farm Food Safety Guidelines for Fresh Fruit and Vegetables in Canada the CHC has developed a Potato Producer and Packer On-Farm Food Safety Manual as well as a Tree Fruit Producer Manual. Each manual is based on HACCP and the Food Safety Enhancement Program (FSEP). During the next 18 months additional manuals will be developed for Bulbs and Roots, Leafy Vegetables and Cruciferae, Small Fruit and Solonacae. In due course each manual will be submitted to the Canadian Food Inspection Agency for Technical Review.

We recognize that this comment period may only be the beginning of discussions between the produce industry and the United States government; we look forward to continued discussions so as to contribute to the development of programs and solutions that will continue to improve the safety of fresh produce offered to consumers.

Responses / comments, which fall within our scope, to the questions posed in the FDA Public Meeting Announcement of June 18, 2004 follow:

1. What concepts or underlying principles should guide the 2004 Produce Safety Action Plan?

- ?? science-based, when and where available;
- ?? a commitment to resource appropriate research when science is not available;
- ?? prevention of contamination through promotion of GAPs and GMPs and effective risk management principles and practices;
- ?? development of commodity-specific and/or commodity group guidelines;
- ?? development of guidelines for each and every segment of the food continuum (pre-farm, on-farm, and all post farm, including consumers);
- ?? like treatment of imported and domestic products;
- ?? determination of risk level, methods to mitigate risk while acknowledging that "risk-free" does not exist;
- ?? FDA/CFIA Action Plan on Food Safety@ initiated by the FDA and the Canadian Food Inspection Agency (CFIA) in 2000;
- ?? consideration of the large volume of fresh produce that crosses our shared border (United States/Canada) and the importance of this trade to producers and consumers in both countries;
- ?? effective education and communication; both must be relevant and not a cause for fear as increased consumption on fruit and vegetables is a major factor in good health and disease prevention;
- ?? increased surveillance, sampling and inspections alone will not achieve our common objectives.

3. The produce action plan covers fresh fruits and vegetables that have not been heat treated to reduce, control, or eliminate pathogens, or otherwise significantly processed. The draft action plan is not intended to cover frozen fruits and



vegetables, fruit and vegetable juices, or other commodities such as tree nuts that are neither fruits nor vegetables and not typically regarded as produce. Should the produce action plan cover additional foods? If so, which foods?

A plan for fresh fruit and vegetables should include each step of the produce supply chain, from the farm level to the consumer.

5. Does FDA's current GAPs/GMPs guidance <http://www.foodsafety.gov/~dms/prodguid.html> need to be expanded or otherwise revised? If yes, please describe generally the areas that need expansion or other revision.

Given the many environmental changes since 1998 and additional scientific knowledge now available relative to contamination, the FDA's Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables may require updates. One example is water temperature relative to the temperature of the fruit or vegetable during packing.

Additionally, self-help tools to assist in identifying potential gaps (relative to GAPs and GMPs) at all stages of the food continuum would be valuable.

6. In today's production and food preparation environments (farms, packing houses, retail establishments, and consumers), what conditions, practices, or other factors are the principal contributors to contamination of produce with a pathogen?

In addition to initiatives at the farm and other establishments, all of society must share in the responsibility and accountability for food safety. Each and every link in the food chain must be aware of food safety issues and the need to exercise practices to mitigate potential causes of contamination and associated illness. The basics of human hygiene, opportunities for cross-contamination, appropriate methods of storage and handling are all essential. Education and resources are critical and require enhancement.

8. What roles can and should Federal, State, and local agencies and the food industry play in developing and implementing action items to help achieve the objectives in this action plan?

Many industry sectors have already invested time and efforts in establishing and implementing best practices and record keeping programs in order to enhance the safety of fresh fruits and vegetables which they produce, handle and distribute. All stakeholders in produce supply chain players recognize the chain is only as strong as its weakest link. Including each and every link is the only way to ensure the strength of this chain.

There must be attention to ensuring that stakeholders who may not be directly connected to the process or who have yet to engage in appropriate initiatives are

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reached. This may be a challenge as such organizations are often are not members of national or regional produce associations. Therefore, a special strategy may be required to reach this audience.

9. Are there existing food safety systems or standards (such as international standards) that FDA should consider as part of the agency's development and implementation of a produce safety action plan? Please identify these systems or standards and explain what their consideration might contribute to this effort.

The Canadian Horticultural Council (CHC) has taken the lead in developing on farm food safety guidelines for fresh fruit and vegetables in Canada. Reference was made to the work our organization has undertaken earlier in this correspondence. The documents are available for your review should you wish to consider the materials.

Please contact the CHC national office for further information on its materials or the undersigned for additional information.

Once again, thank you for the opportunity to comment.

Best regards,

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