

**GRASSROOTS AND INTERNATIONAL MEETINGS
ON MICROBIAL SAFETY OF PRODUCE**

COMMENTS BY THE NORTHWEST HORTICULTURAL COUNCIL

Christian Schlect
President
Northwest Horticultural Council
6 South 2nd Street, Room 903
Yakima, WA 98901
509/453-3193
509/457-7615 fax

97N-0454

C9

Dockets Management Branch (HFA-305)
Food and Drug Administration
12420 Parklawn Dr., Room 1-23
Rockville, MD 20857

The Northwest Horticultural Council (NHC) intends to be represented at the December 12 grassroots meeting scheduled by the Food and Drug Administration (FDA). The announced purpose of the meeting, to be held in Portland, Oregon, is to give an overview of, and obtain input on the general draft guide titled "Guide to Minimizing Microbial Food Safety Hazards for Fresh Fruit and Vegetables" (the Guidelines).

The NHC represents the deciduous tree fruit industry of Idaho, Oregon and Washington on national and international policy issues affecting our growers and shippers. Our organization has been quite active over the past decade in the various food safety issues that have impacted the growing, packing and sales of our apples, pears, sweet cherries and other fruits. Both Dr. Wally Ewart, our Vice President for Scientific Affairs, and Dr. Mike Willett, our Technical Issues Manager, are scheduled to attend the Portland meeting.

While specific industry concerns will be related in greater detail at Portland, the purpose of this document is to draw FDA's attention to serious general concerns we hold about both the process and substance surrounding President Clinton's initiative to ensure the safety of imported and domestic produce.

PROCESS

President Clinton announced his food safety initiative on October 2, 1997. On November 17 in Washington, D.C. FDA publicly gave its first thoughts on how best to implement the President's initiative. Then the Thanksgiving holiday period intervened. On December 12 our industry has its first opportunity to make comment on FDA's proposals. The announced plan is for final guidelines to be published in the Federal Register in 1998.

We submit this is too hasty a time table. The complexity of the fresh fruit and vegetable industry in the United States can not be over estimated. Production practices; climate; storage and handling; and actual health risk vary quite dramatically. We do not believe FDA has an understanding of this complexity nor does the current process give us any comfort that this knowledge will be obtained prior to governmental action.

While we normally applaud "grassroots" meetings where federal officials journey to the countryside to gain knowledge on particular issues, we doubt this is the objective with the Portland meeting. If FDA truly wanted informed producer opinion it would have given more time for the circulation of the "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables." In addition, the meeting would have been scheduled in

one of our actual production areas such as Wenatchee or Medford, not in a major city far from these same production areas. Finally, sufficient time would have been set aside by officials from Washington, D.C. to visit actual orchards to gain a first hand understanding of some of the practical problems growers would be faced with in terms of implementing proposals contained in the Guidelines.

Our growers and shippers are proud of the role they play in providing safe and nutritious fruit for the nation's consumers. They are extremely concerned about any food safety problem that might affect their crops. Beyond the simple human consideration for their health and that of their customers, resides the hard economic reality of the market place. Suppliers of unsafe food soon correct any problem or are out of business. Raw apple juice once sold in commercial channels becomes pasteurized.

In summary, the present process is moving too fast without adequate information being supplied to or sought from production agriculture.

SUBSTANCE

The NHC does not believe that the proposed Guidelines are needed.

It is our opinion that there is a lack of justification for the type of federal involvement in the production for fruits and vegetables as called for by the proposed Guidelines.

Justification must be based on science, risk analysis and an evaluation of economic impacts. Instead, from our advantage point, this process seems to be driven by general consumer fears based on isolated but well publicized food safety problems.

In fact, even if the Guidelines were mandatory, health risks would still exist in the food supply. Zero risk is unachievable.

We, of course, do support good agricultural practices. Food safety is taken quite seriously. The NHC is one of the many produce organizations in the fruit and vegetable industry that came together earlier this year to develop the document entitled "Industrywide Guidance to Minimize Microbiological Food Safety Risks For Produce."

We believe voluntary industry initiatives are more effective and realistic than broad based and heavy handed guidance from Washington, D.C.

By its nature, production agriculture is out of doors and subject to the earth and elements. With our orchards on the foothills of the Cascades, we cannot prevent every deer or other wild animal from occasionally darting through our orchards. The water that comes from these same Cascades or the Columbia River cannot be tested every day for every considerable risk by each of our thousands of growers. "Clean disposable gloves" are not going to be worn by every one who enters our orchards to inspect the fruit.

Our many small family farms are already subject to a crushing burden of red tape and record keeping. Any new requirements are viewed with extreme suspicion.

Safety procedures, if reasonable and tied to actual risk, will be observed both because it is the right thing to do and because the market will demand this behavior. Federal governmental "guidance" which is not viewed by our growers to be connected with actual risk or is unreasonable in terms of costs will be ignored. The general public is not served by its federal government if a food safety program is initiated that does not have the active support of those who produce our fruits and vegetables. Under these circumstances, the Guidelines will be merely words on paper.

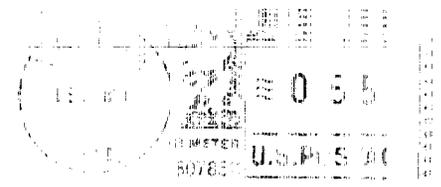
CONCLUSION

The NHC urges FDA to take substantially more time to understand the complexity of the fruit and vegetable industry of the United States and reconsider whether its proposed Guidelines are really needed given a balance of actual risk versus economic costs.

CS/jt

cc: NHC Trustees and Member Secretaries
NHC Science Advisory Committee
U.S. Apple Association
United Fresh Fruit and Vegetable Association
Produce Marketing Association

West Horticultural Council
11th 2nd Street, Room 903
Washington, DC 20001



PERMIT NO. 50007

Dockets Management Branch
Food and Drug Administration
12420 Parklawn Dr., Room 1-23
Rockville, MD 20857