



Canadian Produce Marketing Association

Association canadienne de la distribution de fruits et légumes

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July 23, 2004

Division of Dockets Management
HFA-305
U.S. Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852
By Fax: 301-827-6870

RE: Docket No. 2004N-0258, Produce Safety From Production to Consumption, 69 Fed. Reg. 33,393 (June 15, 2004)

Dear Sir or Madam:

The Canadian Produce Marketing Association (CPMA) would like to thank the US Food and Drug Administration for the opportunity to make the following comments and suggestions with regards to the Produce Safety from Production of Consumption: An Action Plan to Minimize Foodborne Illness Associated with Fresh Produce.

The CPMA is a not-for-profit association committed to increasing the market for fresh fruit and vegetables in Canada, by encouraging cooperation and information exchange among all segments, at the domestic and international levels of the produce industry. The CPMA represents a vertically integrated membership involving all segments of the produce supply chain from the grower/packer/shipper to the retail and foodservice level. The association is comprised of 600 members, including approximately 200 foreign firms and organizations representing over \$7 billion dollars in produce sales in Canada.

First, I would like to say that the CPMA is fully committed to food safety and intends to keep working hard at helping its members enhance its food safety practices. The industry feels that when there is a food safety outbreak, it affects everyone. Our goals are also to protect public health, to protect the food supply, and to protect the produce industry's businesses. For all of those reasons, we have been involved for over ten years now, in developing food safety codes, programs and tools that help the produce industry in the development and implementation of a food safety program in their own operations. The CPMA will continue to examine new science and update its food safety programs and tools as time goes by. It is our intention to continue to help our industry enhance and protect public health with nutritious, wholesome, delicious and safe fresh produce. We are also committed to helping all levels of government better understand what the produce industry is about, how its distribution channels work and needs it has with respect to food safety education and support.



9 Corvus Court, Ottawa, Ontario, Canada K2E 7Z4
Tel. / Tél.: (613) 226-4187 • Fax / Télér: (613) 226-2984
question@cpma.ca



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The CPMA recognizes that this comment period may only be the beginning of discussions between the produce industry and the US government, and we look forward to continuing discussions with the agency to more fully engage in developing solutions that will help improve the safety of fresh produce offered to consumers.

As you will note while going through our replies down here, the CPMA is providing answers to many of the questions that were posed by the FDA in the Public Meeting announcement. For some of the questions however, the CPMA is not providing answers or comments as those topics are either out of the scope of our activities, require expertise that we don't have or are dealt with by other organizations that are better positioned to provide answers.

ANSWERS TO SPECIFIC QUESTIONS

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

The CPMA would support a Produce Safety Action Plan which includes the following underlying principles:

- The Produce Safety Action Plan is based on science;
- The Produce Safety Action Plan uses a systematic process to identify any potential hazardous area in the production/distribution produce supply chain;
- Imported products are treated the same as domestic products;
- The Produce Safety Action Plan is focused on determining what the higher risk processes and products are, and how to mitigate those risks, acknowledging that we do not live in a risk-free world; and
- The Produce Safety Action Plan needs to use a supply-chain approach which is to include all industry stakeholders from farm level to dinner plate, and consumers.

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?

Fresh fruits and vegetables as intended in the produce action plan is certainly a very good start, and food safety requirements for other product items (such as tree nuts) could be assessed as a future step. The coverage of the action plan for all fresh fruits and vegetables should however include all steps 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 scientific knowledge we now have on fresh produce contamination, the FDA's Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables may likely need to be updated. For instance, the temperature of the water that first comes in contact with some types of produce (i.e. apples, tomatoes, mangoes) should be higher than the temperature of the produce in order to prevent pathogens from being pulled into the pulp of the produce (pathogen internalization). Pulp temperature of produce should be taken prior to dumping the product in the water.

In reviewing the GAPs/GMPs, it would be advisable for the FDA to review the processes that take place at the various steps of the produce supply chain (growing, harvesting, cooling, storing, primary packing, transportation, repacking, minimal processing, wholesale, importing, and retail level or foodservice

operation level) to ensure there are no "unturned" stones and potential risky situations are addressed early on rather than following the outset of an outbreak.

It may also be useful to develop tools to help industry stakeholders assess their operation as to what gaps they may have in regards to adhering with GAPs and GMPs. Such tools should be designed to reflect upon common practices and processes of the various parts of the produce supply chain (production/harvest, cooling/storage, packing, repacking, wholesale, retail, foodservice operations), and be designed to help the industry measure where their operations stand as far as meeting the various food safety elements of the GAPs or the GMPs.

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?

All players of the produce supply chain, as those of the entire food supply chain, as well as consumers have a role to play in reducing the risks for contamination or cross-contamination. Knowledge about best practices, whether in the industry or in consumer homes and gatherings, is essential to improving the system.

While many companies have worked at improving their food safety practices and have put in place adequate control measures, it is often recognized that smaller organizations typically do not have as many resources to be able to set themselves up with the same kind of controls. So, for them, not only does education need to be enhanced, but providing them with practical tools to assess their operations and processes, to implement food safety programs and verify that their implemented program meets the set criteria is essential.

Non-traditional food preparation and food service environments need to be on the radar screen of all levels of governments (i.e. national, state, local or municipal government). Information on best practices need to be communicated to those food handlers as well, and processes for verifying that the necessary steps are taken to reduce the risk of contamination or cross-contamination need to be in place.

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?

A large segment of the industry has already invested time and efforts in putting in place those best practices and record keeping programs to enhance the safety of the fresh fruits and vegetables they produce, handle and distribute. The produce supply chain players recognize that the food safety chain is as strong as its weakest link, and that including every link is the only way we can enhance the strength of the chain.

Somehow there needs to be more efforts made to reach those companies that are not "tied into the process", and have not been paying attention to all of the efforts made by the government over the past years to help industry get educated and implement food safety best practices. Those organizations are harder to reach as they often are not members of national or regional produce associations. For all these reasons, there should be a special strategy developed to reach these companies.

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 Produce Marketing Association (CPMA) has taken the lead in developing national Repacking and Wholesale Food Safety Standard and Generic HACCP Model for the fresh fruit and vegetable industry. The CPMA would be pleased to share those documents, as well as their related workbooks, record templates and log sheets with you, if you are interested in such pieces. Here is some background on those food safety documents:

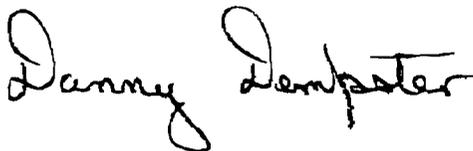
"The CPMA Repacking and Wholesale Food Safety Standard for Fresh Fruits and Vegetables, and its Generic HACCP Model, are documents intended to bring into focus the potential sources of biological, chemical and physical hazards for produce from repacking operations through shipping to retail and foodservice wholesale. Those documents contain the basic information to support the produce industry as it develops, refines and implements measures to enhance the safety of the food supply. These standards are also meant to help repackers and wholesalers document their food safety practices. They provide general food safety guidelines for the repacking and the wholesaling of fresh fruits and vegetables and are not intended to serve as, and do not constitute recommendations or legal advice for any of the material contained herein.

During the summer and fall of 2003, the CPMA, with the help of four Canadian companies involved in importing, repacking and wholesale activities, conducted a pilot to get feedback from the industry on the appropriateness of the developed material. Modifications were made to the various documents, and recommendations regarding the next steps were put forward. As a result, the CPMA is undertaking the development of a virtual modular training tool that is to include interactive multi-media technology, link in all components of its food safety program and provide the industry with tools to assess their knowledge as they go from one module to the other. The tool will be offered in both Internet-based format and on a CDROM. Please contact the CPMA National Office for further information on its Repacking and Wholesale Food Safety Program for Fresh Fruits and Vegetables (Contact: Marie-Claude Thibault, tel.: (613) 226-4187, ext. 225, email: mcthibault@cpma.ca).

When the CPMA did its gap review of the produce supply chain with regards to food safety practices, results had shown a need to address the transportation of fresh produce. As a result, the CPMA joined the Canadian Trucking Alliance in a project aiming at developing trucking food safety best practices. The draft trucking food safety program is now being piloted and should be finalized in the next few months. Finally, the CPMA is involved in the development of other industry food safety resources to cover the food retail sector and the distribution centers.

Thank you again for your consideration of the Canadian Produce Marketing Association answers and comments.

Best regards,



Danny Dempster
President
Canadian Produce Marketing Association
9 Corvus Court
Ottawa, ON K2E 7Z4