



Ohio Fruit Growers Society

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

Re: Docket No. 97N-0451; Microbial Safety of Produce; Grassroots and International Meetings

Dear Sir/Madam:

The Ohio Fruit Growers Society (OFGS) is an organization of Ohio's commercial fruit growers. Ohio's fruit industry is significant and very diverse. Ohio ranks among the top ten states in overall fruit and vegetable production and among the top ten in the production of many individual fruits and vegetables. Ohio producers are totally dedicated to making our products as safe as possible for the consumer therefore we appreciate the opportunity to comment on the Food and Drug Administration's (FDA) proposed food safety guidelines for fresh fruits and vegetables.

The OFGS has several concerns regarding the proposed guidelines including: FDA involvement in a traditionally USDA area of oversight, FDA lack of lead time and protocol in this effort, supervision of imports of foreign produce, guidelines are only a first step to regulation and the feasibility and effectiveness of some of the specific guidelines.

The agriculture industry is unused to and uncomfortable working with the FDA. While the industry recognizes the agency's Expertise in many areas, we feel that the USDA is more knowledgeable with farm production issues and that producers have an established positive relationship with USDA, which would result in a more effective implementation of any guidelines or educational programs.

Ohio producers do not understand the urgency that FDA has apparently attributed to this effort and which has drastically shortened standard notification and comment timetables. The OFGS did not become aware of the FDA proposal and regional hearings until after Dec. 1 and then from a producer organization in another state. Because of the abbreviated time line OFGS has not been able to gather sufficient input from producers. While food safety is an important problem, there is no imminent threat to public health that will be prevented by a premature release of "GUIDELINES". The artificial urgency that FDA has attached to this effort makes growers uncomfortable and suspicious of any hidden motives of the FDA.

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While the FDA proposal is supposedly directed at foreign producers as well as domestic producers, Ohio growers doubt that the agency can effectively communicate the guidelines to foreign producers much less monitor their operations and effectively screen foreign imports. Such an effort also raises significant trade issues that might in the end negatively impact US produce exports.

While Ohio's fruit producers are supportive of FDA's efforts to improve produce safety by enhancing production and handling practices, we do not believe that voluntary guidelines are necessary nor will they be effective. Ohio Fruit producers have been cooperating with the Ohio Dept. Of Agriculture for three years in an educational effort with cider producers. This effort involving seminars, courtesy inspections, articles and mailings to producers has been very effective in upgrading the sanitation practices and good management practices employed by producers. Producers have adopted practices and upgraded their facilities far beyond the required regulatory standards.

Beyond the voluntary guidelines, producers fear that the real intention of FDA is regulation. Regulation of such a diverse industry would be impossible. Any effort to develop regulations, which would fit such a diverse domestic and foreign industry would be futile and are unnecessary. The market and education are and will be much more effective tools in improving produce safety. Many retailers have strict sanitation and operational requirements which growers must follow to retain their market. This structure of oversight is already in place and with research and educational programs can address the problem more effectively than regulation.

While most of the FDA's proposed guidelines are just common sense and supported by the industry, some are also unworkable and perhaps even counterproductive. More time is needed for the industry to determine all of the implications of the guidelines, but some problems are obvious to growers. An example of this is the proposal for wearing of disposable gloves by produce workers. Some crops and situations are not conducive to rubber gloves and in numerous situations in the field and in the packing house gloves can be a greater sanitation problem than periodically washed hands.

In summary, we encourage the FDA to rethink any proposed guidelines and certainly insure the industry that any guidelines will not evolve into regulations that would be oppressive and unworkable. We would recommend that the agency work with the USDA, grower organizations, retailers and consumer groups to develop a comprehensive (field to plate) food safety educational program. This type of program would more effectively address the problem and significantly improve food safety. In addition more resources should be devoted to research to determine the real causes of past food safety incidents and to develop effective prevention measures.

Thank you for the opportunity to comment.