

December 15, 1997

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Dockets Management Branch (HFA-305)
Docket #97N-0451
Food & Drug Administration
12420 Parklawn Drive - Rm 1-23
Rockville, MD 20857

Gentlemen:

I am writing to comment on the proposed "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables. I am a farmer who grows 50 acres of vegetables, strawberries, and raspberries. I am president of Ohio Vegetable and Potato Growers Assoc.

I would not want any of my customers to get sick from eating fruit and vegetables that were grown on my farm. I have no problem with carrying out those practices that have been proved to reduce microbial contamination of fruits and vegetables. I understand that there is a limited amount of research on how to eliminate microbial contamination. A shotgun approach of practices whereby hopefully one or several practices eliminate the problem should not be used. Rather, a targeted practice proved by research should be used.

Your proposed guide to minimize microbial food safety hazards for fresh fruits and vegetables does not have the force and effect of law but this guide, if adopted, will be law because produce buyers will buy produce only from growers who follow the guide to the letter.

I have the following concerns about the proposed guide.

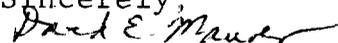
- A. The recommendation to delay irrigation until water quality improves is not practical because overhead irrigation may be immediately necessary due to forecasted freeze conditions; temperatures over 80F requiring cooling of the crop; and low soil moisture. This all happens on a strawberry crop grown in eastern United States.
- B. What control practices to protect water in open reservoirs are you talking about? Fences to keep wildlife and live-stock out? Covering the reservoir so that waterfowl cannot land on it? Some are practical and some are not practical.
- C. Drip irrigation will increase the cost of growing strawberries in eastern United States because overhead sprinkler irrigation will still be needed for frost control and cooling.
- D. Treating strawberries and raspberries to UV radiation, low-dose ionizing radiation, ozone, or gas based disinfectants will increase growers expenses. It is doubtful this cost can be passed on to the consumer. Grower's profits will be reduced.

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- E. I have a real concern about your recommendation to control wildlife microbial contamination of produce. I have a great deal of experience in controlling damage to crops by deer and Canadian Geese. "Wildlife Experts" will tell you that Visual and Auditory deterrents will scare deer and Canadian Geese. I can tell you from experience that these methods do not work. Fences and dogs may help keep deer out but again this is an additional expense that cannot be passed on to customers. There are no physical deterrents that will keep geese from landing on your farm. The only way to positively control geese and deer is to kill them and this is illegal because of state and federal laws and international treaties. This is just another example of one agency of the government telling you to do something and another agency not allowing you to do it.
- F. This guide is asking growers to monitor employee's health. This will be nearly impossible to do because:
1. You are infringing on the employee's right to privacy opening the employer up to a lawsuit.
 2. A great deal of time each day would be consumed asking employees how they felt health wise that day.
- G. It would be difficult to have warm water in the field so that employees can wash their hands with warm water and soap. How about using sanitizing agents such as "Purell" made by Gojo Industries, Inc. , Akron, Ohio.
- H. I do not see that a pest control log would be of any benefit in controlling microbial contamination. It would be another piece of government paperwork. Anyone can see if pests have invaded the packing house etc.
- I. Positive lot identification would be a mountain of paper work for produce handlers thus increasing their costs which in turn would be reflected in lower prices to the producer.

Finally, I don't understand the rush in implementing this guide. The working draft is dated November 25, 1997 and comments must be received by December 19, 1997. That is a very short comment period.

Sincerely,

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