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***Comments on
Working Draft of proposed
Guide to Minimize Microbial Food Safety
Hazards for Fresh Fruits and Vegetables***

Docket No. 97N-0451

Presented by:

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Our state wide association, the Texas Produce Association, was organized in 1942, and represents the interests of growers and shippers of fruits and vegetables. We offered comments on the proposed food safety guide in Helotes, Texas on December 8, 1997 but would like to offer additional comments at this time.

Although we understand and support the need to provide the safest fruits and vegetables possible, we are very concerned that some recommendations found in the guide may not be practical to implement or may not be effective in achieving the goal. We are also concerned that voluntary guidelines are just one-step away from mandatory regulations or that our customers may consider any government guideline "the answer to the problem" and require that our growers/shippers abide by these guidelines or they won't buy our products.

We also want to state that any guidelines must be very, very broad to take into consideration the huge number of variables that exist in the growing, harvesting, packing and transporting of fresh fruits and vegetables. Some guidelines may work just fine for larger growers/shippers who cater to the retail trade but how do they fit the small operator who sells on the roadside, at farmers markets or perhaps directly to his local grocery store? How will they work for the pick-your-own operator or the organic grower? How do they fit shed packed verses field packed products? Water may come from five or six different types of sources and may be applied through irrigation in many different ways. Training of a large work force is a never ending and almost hopeless task which we realize needs to be done if it gets to the root of the problem. If however the guidelines are not effective, they just become an unnecessary expense to the grower/shipper, which places him in a less competitive position with producers in exporting countries to the U.S. that do not have to follow the same "rules."

We also question why the development of a food safety guide for growers and shippers is necessary. In the introduction of the working draft it states that "the incidence of food borne infection from fresh produce is relatively low." It also states that it is increasing and states percentages of increases since 1973. We argue that the problem is not on the farm or in the packing houses but firmly believe the increase in food borne illness due to microbial contamination is largely based upon poor handling of the fruits and vegetable at the consumer's end. Virtually all outbreaks occur in places where food is prepared in large quantities, (restaurants, schools, church functions, rest homes and other mass food service activities) and not properly cared for by minimizing cross-contamination with other food items or by not maintaining proper temperature. Texas, and other food producing states ship our products from coast to coast and around the world. If our products were not safe, we would have a world wide epidemic - - -but we don't! How often do we get sick from "food poisoning" when eating at home? Hardly ever. Why?

Because the food is prepared properly and immediately served - - - good handling!

If our belief is correct, and the facts should confirm it, these guidelines should simply mirror the growing and shipping practices that are presently being adhered to by our industry. Even assuming that this basically is the goal of FDA and USDA, the short time frame during which this guide is being developed will severely limit the ability to determine and confirm the major processes and procedures that are already in place.

In the preface of the working guide it states that "the agencies plan to issue additional guidance documents addressing good agricultural practices and good manufacturing practices for specific fruit and vegetables in the near future." Why? If a fruit and vegetable guide must be developed, make it as broad and flexible as possible so that it applies to all commodities. We certainly don't want the agencies to pick items grown in Texas for development of specific commodity guidelines. Commodity specific guides are going to send a message to the trade and consumers that a particular product is less safe to eat than those that were not singled out. That implied message could cost growers/shippers of that particular item untold amounts of lost sales. Besides that, the specific commodity guide can't be very focused, there are too many variables that producers of a particular commodity have to cope with including product variety, weather, soil type, water source, appropriate irrigation techniques, packing facilities and procedures, various types of product cooling methods, if applicable, etc . . . What works and what doesn't work has been determined by years of research, and trial and error. Just give us some broad general commodity guidelines based upon good cultural practices, good science and good common sense.

Thanks again for allowing us to comment on this proposal. If there is anything additionally we can provide, please let us know.

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