



December 31, 1997

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

Re: Docket No. 97N-0451

The Northwest Food Processors Association represents 75 fruit and vegetable processors operating in Idaho, Oregon and Washington. Food processing is one of the principal manufacturing industries in the Northwest region.

NWFPA member companies process fruit and vegetable commodities with origins primarily in Northwest crop lands. Many Northwest crops destined for fresh-market or processing are not segregated before harvest. The FDA's proposed Good Agricultural Practices Guidelines will affect many raw materials destined for processing with comparable financial impact as for the fresh produce industry.

Since these products receive a lethal treatment before consumption, no added measure of safety is achieved. As a result, one of two situations arises:

1. Cost increases are passed on to consumers for many processed fruit and vegetable items without greater assurances of safety.
2. In industry sectors where market forces dictate that costs cannot be passed on, Northwest processors will be disadvantaged because of this region's lower margins already experienced because of higher transportation costs from the Northwest to major southern and eastern markets.

NWFPA has a longstanding cooperative relationship with the FDA based on a mutual concern for an efficient and effective food safety system. However, the proposed guidelines are too hastily conceived.

The current proposal has not allowed adequate review time by stakeholders, including the processed fruit and vegetable industry, to fully understand the recommendations and assess their impact. The time line to finalize guidance by mid-1998 is unrealistic and

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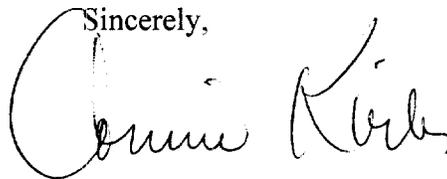
inconsistent with the objective of cooperative involvement with the agricultural community.

Many of the guidelines are specific in nature but based on speculative assumptions rather than hard scientific data. Guidelines must reflect known food safety risks and must be developed around a comprehensive science-based risk identification program. The current guidelines leave the grower too vulnerable to unwarranted criticism for agricultural practices which are inappropriate or unnecessary but, nonetheless, inconsistent with FDA recommendations.

End-product usage, particularly where lethal treatment is applied either in the factory or the home, must be factored into recommendations. Needless requirements for good agricultural practices will bring undue hardship to farmers and processors, increased food costs for consumers, and unsupportable assurances of improved food safety which will undermine public confidence in the FDA's ability to regulate the food supply.

While the FDA emphasizes that guidelines do not have the same legal binding as regulations or statute, when finalized, these guidelines will represent the agency's current thinking on what constitutes Good Agricultural Practices. Guidelines will dictate agency actions domestically and abroad and will become the standard by which those outside the agency measure the performance of the industry. Their importance to the industry should not be underestimated. These guidelines must be revised to reflect sound scientific evidence and a participative, deliberative process with stakeholders.

Sincerely,

A handwritten signature in cursive script that reads "Connie Kirby". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Connie Kirby
Director, Scientific and Technical Affairs



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