



Canadian Food Inspection Agency / Agence canadienne d'inspection des aliments

Dairy, Fruit and Vegetable Division  
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0593 '98 JAN 20 P2:31 Your file / Votre référence  
Our file / Notre référence

**F A C S I M I L E**

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

Gentlemen:

**Re: Comments to Docket 97N0451 on USFDA and USDA's Working Draft - Guidance to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables**

Thank you for the opportunity to comment on the USFDA and USDA's draft Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables. Our comments are based on explanations provided at the International Meeting on the President's Food Safety Initiative held in Washington, D.C., on December 8, 1997 and discussions held between our officials on other occasions.

The Canadian Food Inspection Agency (CFIA) is very interested in the President's Food Safety Initiative on the microbial safety of produce. The CFIA has initiated the development of a similar program for the safety of domestic and imported fresh fruits and vegetables in Canada. The Canadian program will also include standards of practice for growing, harvesting, processing and distribution of fresh fruits, vegetables and fresh-cut produce.

The various categories established such as water, manure and municipal sewage sludge, worker hygiene, field and facility sanitation, and transportation utilized in your working draft document are appropriate broad areas to include in the initiative. More research will be required for the establishment of specific technical requirements under these categories to ensure the reduction or elimination of pathogens in produce. We will be in a better position to comment on specific technical requirements when USFDA and USDA issue additional guidance documents and requirements for specific fruits and vegetables and as CFIA develops its own program with input from the Canadian fresh produce industry.

Canada

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Given the complexity of the fresh produce industry with regard to the specific commodity requirements for different regions and the significant climatic differences between regions in Canada and the U.S., guidelines and regulations should be based on safety outcomes rather than on strict requirements. Flexibility in the design and application of requirements will be essential. Guidelines should provide a selection of scientifically valid options for various practices and regional conditions that will reduce pathogens to levels that ensure produce safety.

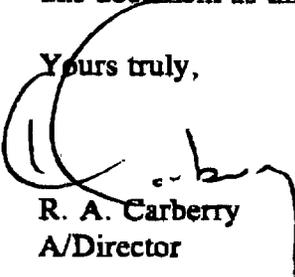
These guidelines should focus on well defined safety outcomes with scientific demonstration on how particular technical requirements meet the outcomes. As such, the impact on producers adjusting their practices to accommodate any new recommendations should be carefully assessed so that safety outcomes are achieved by a practical intervention. The establishment of an outcome-based document with guidelines that elaborate the possible means to achieve specific safety outcomes may provide the necessary flexibility that this sector requires in meeting any regulatory requirements.

The scope of the USFDA and USDA's draft Guide is appropriate in that it seeks to oversee all practices relative to the microbiological safety of fresh fruits and vegetables. However, it is not yet clear how these guidelines might be used for oversight purposes in domestic application and for the assessment of importing countries.

As U.S. and Canadian programs have similar scopes and objectives, we would appreciate an ongoing dialogue with the U.S. to share information relative to our respective program development and to facilitate recognition of our systems at some point in the future.

As you are aware, at the last meeting of the Codex Committee on Food Hygiene, Canada accepted the lead role for drafting the Code of Hygienic Practices for Primary Production, Harvesting and Packaging of Fresh Produce. As the U.S. is a member of the drafting committee, we look forward to your participation and assistance in drafting this document as this will enhance our cooperative effort in this initiative.

Yours truly,



R. A. Carberry  
A/Director

IL/sc

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