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d'inspection des aliments

JUN 26 1998

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Dockets Management Branch (HFA-305) 1150 '96 JUN 30 P1:44
 Food and Drug Administration
 12420 Parklawn Dr., Rm 1-23
 Rockville, MD 20857

Attention: Ms. Saltsman

Dear Ms. Saltsman:

Re: Comments to Docket 97N-0451 on USFDA and USDA's Draft Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables

We are pleased to comment on the above draft Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables. Attached, you will find our comments based on explanations provided at the International Meeting on the President's Food Safety Initiative held in Washington, D.C., on December 8, 1997, Cairns Group Meeting in Washington, D.C., on May 11, 1998, and further discussions held among our officials on other occasions.

The Canadian Food Inspection Agency (CFIA) welcomes United States' efforts to improve food safety. Like the United States, Canada is taking a number of steps to enhance the safety of the Canadian food supply.

Sincerely,

(For) Vickie Therrien
 A/Director, Programs, International Coordination
 Policy, Planning & Coordination Directorate

Attachment

c.c. A. Gravel V. McEachern
 Dr. A. Fraser J. Standish
 R. Carberry D. Bryanton

97N-0451

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COMMENTS ON THE US FOOD SAFETY INITIATIVE GUIDANCE FOR INDUSTRY

ISSUE:

Comments to Docket 97N-0451 on USFDA and USDA's Draft Guidance - "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables."

BACKGROUND:

As part of the US President's Food Safety Initiative, this Draft Guidance developed by USFDA in partnership with USDA establishes some basic principles and recommends good agricultural practices (GAPs) and good manufacturing practices (GMPs) to growers and operators with a goal to reducing the incidence of food-borne illness associated with fresh produce. The guide covers four major areas of concern: water quality; manure and municipal biosolids; sanitation and hygiene; and traceback. It will serve as a reference standard for growers and operators in assessing the risks associated with their operations and in implementing reasonable and cost effective alternative management practices to minimize microbial hazards. The document is currently in distribution for comments.

COMMENTS:

The US guide is a very comprehensive document introducing GAPs and GMPs at the producer level and offers sound and basic good management practices in addressing microbial concerns. The educational approach taken in the application of the recommendations provide the flexibility which is essential for growers and operators. The guide focuses on the prevention of microbial contamination of fresh produce in common areas of concern in the growing, harvesting and distribution of fresh fruits and vegetables rather than on corrective actions taken with the end product.

The outlined principles for the assessment of microbial hazards are consistent with those used in Canadian food inspection strategies such as the Food Safety Enhancement Program, the Quality Management Program, and the good manufacturing practices based on the Codex General Principles of Food Hygiene. The guiding principles also are consistent with two initiatives of the Canadian Food Inspection Agency (CFIA) for the safety of domestic and imported fresh fruits and vegetables in Canada: the development of good agricultural and good manufacturing practices for fresh fruits and vegetables; and the development of on-farm HACCP-based systems in partnership with the Canadian Horticultural Council. The Canadian initiatives will focus not only on microbial hazards but also on other safety concerns such as chemical hazards.

In the US guide, more specifically, the section on traceback is excellent and takes an integrated food chain approach recognizing the importance of farmers and packers working with their partners in transportation, distribution, and retail to develop tools for the identification of produce

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from the farm to the retailer. However, the importance of documentation and records also should be stressed in the guide as an important element to help in the investigation of produce-related outbreaks. CFIA recommends that farmers keep documentation and records on agricultural activities such as the site of production, suppliers' information on agricultural inputs, lot numbers of agricultural inputs, irrigation data, water quality data, cleaning schedules, etc. Packers should keep records concerning each lot such as information on incoming materials (e.g. information from growers, lot numbers), data on quality of wash water, cooling and storage temperatures, and cleaning schedules, etc.

In the section on Sanitation and Hygiene, the guide recommends that customer-pick operations and road-side produce stands consider opportunities to educate consumers on good produce handling and processing practices. This approach may be unrealistic: operators are unlikely to pursue this initiative as this sector of the industry is relatively small, and not very sophisticated.

It is not anticipated that the US guidance document would create any unequal restrictions or barriers to Canadian produce entering the US market. However, in order to maintain equivalency in the food safety infrastructures between the two countries, CFIA will ensure that the Canadian initiatives on fresh produce move ahead with priority.

CONCLUSION:

While this document provides useful guidance overseeing all practices relative to the microbiological safety of fresh fruits and vegetables, it is not yet clear how these guidelines will be used for oversight purposes in domestic application and for the assessment of importing countries. The Codex Committee on Food Hygiene has initiated work on a Code of Practice for the Primary Production, Harvesting and Packaging of Fresh Produce. Canada and US are involved in this Codex initiative and will highly benefit from collaborating with the international community in the development and the implementation of international standards in this sector.

Given the similarities in scope and objectives of both the US and Canadian programs, we would appreciate an ongoing dialogue with the US to share information relative to our respective program development and to facilitate recognition of our systems at some point in the future.

Vance McEachern
A/Director
Inspections Strategies Division
Policy, Planning & Coordination Directorate

Jim Standish
Director
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