

Memo

To: Ginny Butler

0324 '98 JAN 12 P1:35

From: Camille Brewer

Subject: Docket 97N-0451

Date: January 8, 1998

The transcriber for the Geneva, New York grassroots meeting held on 12/3/97 arrived late. Dr. Joyce Saltsman took notes until he arrived. The following notes are submitted to the docket (97N-0451) as a supplement to the Geneva transcript.

In addition, a video tape submitted by J. Luis Rodriguez is enclosed. This video should be included as a supplement to the Florida transcript.

Thank you.

Camille E. Brewer, FSI staff

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Geneva, NY Grassroots Meeting on Fresh Produce Food Safety Initiative

Stacy Zawel (United Fresh Fruit and Vegetable Association):

The source or vehicle of the pathogens associated with transmitting pathogens to the strawberries is not known. We need to be clear about the source of contamination without assuming that the vehicle originated at the farm level.

The agency plans on developing commodity specific guidance documents. Would you consider using commodity specific documents that have been developed by the industry and documents developed by independent operators?

Tom Gardine (FDA):

We would welcome these. I might add that regarding your point about identifying the source of contamination... we agree that it is very important for everyone to correctly identify the source of any contaminated produce, if possible. However, when news about contaminated produce reaches the public, the people react and that will impact you, the growers.

Joe ?? :

There are opinions on where the outbreak began, but we can't say what the source was. Cyclospora-contaminated raspberries probably originated in South America.

Stacy Zawel:

Our concern is that one mis-statement has huge financial implications.

Bill Pool (Wegmans Food Market):

Our concern is the perspective to the public. The perspective is that we can't promise that there is no risk to food. We need to show the public that there is an inherent risk in all we do. Can't avoid risks. With respect to guidance on food safety... the trade associations have done some work on this. We should not re-invent the wheel if this information is already available.

Tom Gardine:

We are working with the produce industry.

Stanley Iwanicki (Agrilink Foods):

How will the produce GMPs differ from CFR section 110?

Tom Gardine:

Part 110 applies to all foods; part 113 applies to canned food; and part 114 applies to acidified food. If we focus on minimally processed foods, such as produce that receives little to no treatment after harvesting, we can give guidance there.

Stanley Iwanicki:

You plan on developing GMPs for specific commodities. We find use of that term problematic because the term "GMP" is a regulatory term. If you intend the document to be for guidance purposes, that term may create confusion and misinterpretation.

Tom Gardine:

Thank you. Let me say that nothing in this guide overrides other regulations.