



## **California Cantaloupe Advisory Board**

**Submission of Written Comments:  
Food and Drug Administration, HHS.  
(Docket No. 2007N-0051)**

**Subject: Safety of Fresh Produce**  
**Submitted by: California Cantaloupe Advisory Board,  
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The California Cantaloupe Advisory Board (Cantaloupe Board) represents all shippers and handlers of cantaloupes in Central California. The Cantaloupe Board was formed to address marketing and promotion of cantaloupes. This program includes mandatory government inspection and quality certification for 100% of the Cantaloupes shipped from the district.

The California Melon Research Board (CMRB) represents all farmers of all melon varieties, with the exception of watermelons, grown throughout California. The CMRB was formed to fund preharvest research projects.

The Cantaloupe Board and The CMRB are state marketing orders that operate under the authority and oversight of the California Department of Food and Agriculture. Activities of the Boards including the cost of state oversight are funded solely by cantaloupe producers and handlers through a self-assessment fee structure.

In a February 2004 letter, the Federal Food and Drug Administration stated that cantaloupes are one of five produce commodities of concern in regard to food safety. It is important to note that cantaloupes produced in California have never been implicated in a food borne illness outbreak. However, the California industry has been severely impacted economically by the release of government concerns and warnings as well as media misrepresentations regarding food borne illness outbreaks associated with cantaloupes from other growing areas.

Beginning many years prior to the 2004 FDA letter, the California cantaloupe producers and handlers had taken a leadership role in food safety research and the development of commodity specific guidance. For example:

- In 1997 a Food Safety Committee was added to the standing committee structure of the handler Marketing Order. This committee was directed to establish a program to address food safety and California cantaloupes including handler practices, grower outreach, research, media, and crisis management.
- Since 1999, the California Cantaloupe Advisory Board and the CMRB have taken a broad approach to research applying modern microbiological methods and technology to address areas in production and handling – from the farm through the shipping point. The program has three distinct elements:
  - 1) A multi year science based research program was begun with Dr. Trevor Suslow and Dr. Linda Harris through the University of California at Davis. The research was a comprehensive study of melons and microbial pathogens using the most up to date science available. How melons and microbial pathogens interact in the laboratory and in the field was the basis for the study. The research examined growing, packing, cooling, distribution and processing as well as foodservice and consumer handling.
  - 2) During the six years of research, the industry engaged researchers from the University of California at Davis to sample California cantaloupes for Salmonella from the field through the shipping point. Researchers tested more than 2,000 field-collected cantaloupe samples and no Salmonella bacterium was ever detected.
  - 3) In conjunction with the research and the sampling, Dr. Suslow and his staff have been given complete access to the California industry to review and understand all of the handling practices currently in place. This analysis was undertaken to allow the development of Best Management Practices for California cantaloupes, which was published by UC Davis in 2005. The UC Davis staff continually monitors new handling techniques

and other food safety enhancements applicable to the California industry and advises the Cantaloupe Board as to their recommended solutions.

- In 2002 The Cantaloupe Board added “Trace Back” to its mandatory inspection program. Along with the mandatory quality Certification Stamp, all handlers are required to have a verifiable trace back code adhered to every box shipped.
- In response to the 2004 FDA letter, the melon industry was the first commodity to complete commodity specific guidance for farmers and handlers. The food safety committee of the Cantaloupe Board and the UC Davis research and Best Management Practices were key components in the development of the Commodity Specific Guidance, which was published in the spring of 2006. The guidance provides food safety standards for all field production and shipping practices, including the use of irrigation water, fertilizers and pest control tools, worker hygiene, field sanitation, harvesting practices and packing facilities practices.

The California Cantaloupe Advisory Board has worked with scientists to examine regional differences and growing practices between California and production areas which have been associated with food borne illness outbreaks. Through this examination, it was found that California’s hot, arid summers and careful field preparation and irrigation methods used by farmers keep the cantaloupes dry which ensures the melon rinds develop properly. Research has shown that the cantaloupe rind is an impenetrable barrier to microbial intrusion. Melons grown in some other regions are often subjected to wet weather making the melon rinds susceptible to “ground spots.” Breaks in the rind such as “ground spots” can be an area of entry for potentially harmful microbes.

Harvesting techniques in California are also unique. While other areas must primarily rely on “shed-packing” to clean the fruit prior to packaging; most California cantaloupes are harvested and packed in the field or in sheds without water flumes or washes. These methods ensure that the cantaloupes are handled as little as possible thereby lessening the likelihood of exposure to harmful microbes or bacteria. After packing, the cantaloupes are cooled via forced air. The cantaloupes do not need to be washed thereby

minimizing exposure to water and lessening the chance of potentially harmful bacteria attaching to the rind.

Despite an impressive food safety track record, regional growing differences, and climate that lessen the chances for a food borne illness outbreak, the California Cantaloupe Advisory Board has asked the California Department of Food and Agriculture to modify its marketing order. The modification would allow the Cantaloupe Advisory Board to verify handlers' compliance with the commodity specific guidance through government inspections. This request for increased regulation through mandatory compliance with commodity specific guidance and verification through the marketing order was made to the California Department of Food and Agriculture in January 2007.

While the California Cantaloupe Advisory Board would not oppose federal government regulation of its commodity, the marketing order structure allows a quick and effective regulatory "fix" and provides the flexibility to develop food safety standards specific to growing conditions for melons in California. In addition, this structure would allow for these standards to be amended whenever new science and research warrants change. According to CDFA representatives, a change to the marketing order to include food safety oversight could be in place within 12 to 18 months. However, as the agricultural industry has seen, the California Leafy Greens Marketing Agreement was in place within only four months.

The California Cantaloupe Advisory Board has shown throughout its history that it is committed to be part of developing food safety solutions and the Board would be willing to work with government agencies to develop federal regulations to be administered on a national level. This national common solution must provide for compliance to the best available scientific based GAPs and GMPs for all cantaloupes both domestically grown and imported. The California Cantaloupe Advisory Board knows first hand the impact caused by public perception of food safety risks associated with any melons. We want to be part of the solution.