



Oregon
Department
of Agriculture

December 30, 1997

Docket Management Branch (HFA-305)
Food & Drug Administration
12420 Parklawn Dr.
Room 1-23
Rockville, MD 20857

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Docket No. 97N-0451

These comments are being offered on the Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables. While we feel the document as a whole is well written, we would like to offer the following comments for your consideration.

In many cases farmers have a well-developed system through which they obtain technical assistance relative to their crop production system. We feel that it is important to integrate food safety related crop production practices with the system of best management practices maintained and recommended for water quality and farm management plans. It is important to utilize the expertise of the many organizations that are available, such as the Natural Resources Conservation Service (NRCS) and the Extension Service, in incorporating food safety related recommendations into existing crop production operations and this is best done when farmers are receiving basic technical assistance and planning rather than in an ad-hoc after the fact fashion. By the time a grower has purchased equipment, established a process and gone into production, it is difficult to make changes.

As discussed in your draft, contaminated water can be a source of pathogen contamination through direct contact with produce or by spreading contamination in the field or processing area. We feel that the responsibility for the quality of the water rests with the purveyor. If a grower has control of a well or reservoir that he is irrigating from, he should be responsible for the quality of water that he is putting on a crop. If he is obtaining water from another source (ie- surface water) the provider should be

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responsible for the quality. Because of the potential for temporary/intermittent contamination to occur in these systems; we feel that the purveyor may be the person most likely to control quality of the water. In any event, we do not feel that it is reasonable or likely to expect the grower to monitor the safety of the water which is not under his control.

In several areas the draft refers to the effective use of sanitizer or antimicrobials in wash water. We feel that better guidance needs to be given on the use of chemicals on the farm. If growers are going to be using antimicrobials to control potential hazards in wash/processing they should be given information on how to avoid the potential problems with releasing this treated water into public waters.

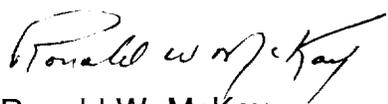
The second area we wanted to comment on was the practice of using manure on fields growing agricultural crops for human consumption. To be effective, manure must be put on the field at the right time in order for it to be used by the crop and not washed away. In some cases, this may require having to store the manure for some time prior to use. Many states have water quality related regulations dealing with the requirements for holding manure for extended periods of time and we feel that more guidance should be given. In addition, manure may be transported in dry windy areas as soil and manure particles from stockyards, feedlots, etc. are introduced into the air. There is little guidance available on the appropriate distance of fruit and vegetable production from nearby sources of manure.

One method of distributing liquid manure onto the agricultural land relies on the use of a spray gun. This practice raises some questions about the potential for harmful bacteria being carried in "drift" from one field to another. There needs to be more information available if there are concerns with this practice.

The last area we wish to comment on is the issue of worker hygiene. The draft discusses that illnesses associated with fresh fruits and vegetables are primarily those transmitted by the fecal-oral route. It goes on to recommend that employees should be trained to report to the person in charge any information about their health or activities as they relate to diseases that are transmissible through food. We are concerned that after

the first worker is sent home because such a report was made, no other worker will report an illnesses. While we share your concern with of the method of transmission, we do not feel that the solution is practical. More discussion needs to be held on this subject for a more workable solution.

We want to thank you for allowing us the opportunity to comment on these guidelines. We hope they will be of some assistance.

A handwritten signature in black ink that reads "Ronald W. McKay". The signature is written in a cursive style with a large initial 'R' and a long horizontal stroke at the end.

Ronald W. McKay

Administrator

Food Safety Division



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