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

Onderwerp : Food Safety Initiative  
Referentie : BR010.980615

The Hague, June 15, 1998

Re: Food safety Initiative comment on proposed guide for fruits and vegetables (MD 97N-0451)

Dear madam, sir,

We received the proposals through your embassy in our country and we would like to react on the proposals.

The idea of a guide is not new to us. The implementation of the EU-rules on HACCP have worked out in the development of officially recognized guides for (retail) trade. We developed this guide on a basis of a risk analysis by our institute the Rikilt in Wageningen, which is specialized in this matter. It deals not only with microbiological risks but also with physical and chemical (residue and contaminants) risks.

As a consequence we are developing a guide for the production of fruits and vegetables although the HACCP rules are not applicable on the production. The first draft of this guide we sent out some weeks ago for comments.

Comparing our draft guide with your draft we want to make the following comments.

1. Our guide is not only dealing with microbiological risks but also with physical and chemical risks.
2. We have another approach that means we start with
  - rules for personal hygiene
  - rules for hygiene in production facilities
  - rules for equipment and harvesting material
  - physical matters
  - chemical matters
  - microbiological matters
  - attention points for each production step: growing-harvesting-packing and grading-storage and transport

Then we have a chapter on recommended actions on:

- meeting the requirements on hygiene rules
- physical aspects
- chemicals (residues and nitrate)
- microbiology

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As an annex we have a checklist.

Concerning microbiological risks for fruits and vegetables (whole products) we do not see a potential risk for our products on the condition that our producers are working on the basis of the guide. You have to take into account that the use of animal manure in the Netherlands is rather limited. However, new developments and unforeseen circumstances could create problems. On the basis of the guide for (retail) trade we are therefore developing a warning system for our industry to give as quickly as possible information and advices in the case of microbiological problems. Also we will have a regular review of the risk analysis for this products.

In this context it is difficult to give detailed comments on the various points of your concept guide. In general we are of the opinion that the idea of having a guide is a good one and it will help the industry to minimize health risks. It might be useful to be more specific in your guide for some product groups or production areas. We have done it in our guide for several specific items. It might be useful to exchange views in a bilateral discussion. If you want to have this please contact mr. C. van Leeuwen of our office.

A copy of this letter we send to the American Embassy in our country.

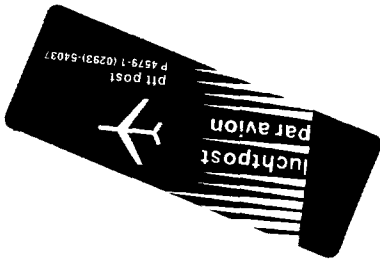
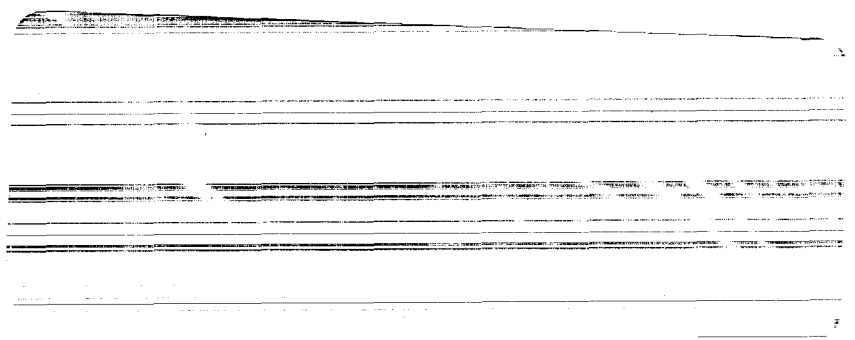
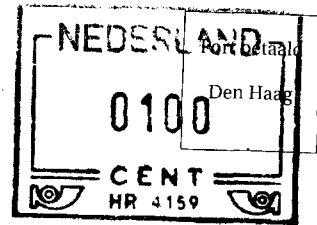
Yours truly,  
PRODUCT BOARD FOR HORTICULTURE

A handwritten signature in black ink, appearing to be 'J. van der Veen', written over the typed name and title.

J. van der Veen  
*chairman*

Productschap  Tuinbouw

Postbus 90403, 2509 LK Den Haag



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